Public Document Pack

Planning Applications Sub-Committee

Date: **FRIDAY, 31 JANUARY 2025**

Time: 10.30 am

Venue: **LIVERY HALL - GUILDHALL**

Members:

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

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES OF THE MEETING HELD ON 6 DECEMBER 2024**

   To agree the public minutes of the Planning Applications Sub-Committee meeting held on 6 December 2024.

   For Decision
   (Pages 5 - 20)

4. **MINUTES OF THE MEETING HELD ON 13 DECEMBER 2024**

   To agree the public minutes of the Planning Applications Sub-Committee meeting held on 13 December 2024.

   For Decision
   (Pages 21 - 76)

5. **99 BISHOPSGATE**

   Report of the Director of Planning & Development.

   For Decision
   (Pages 77 - 964)

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

   Report of the Chief Planning Officer & Development Director.

   For Information

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

   Report of the Chief Planning Officer & Development Director.

   For Information

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

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

PLANNING APPLICATIONS SUB-COMMITTEE
Friday, 6 December 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Friday, 6 December 2024 at 9.00 am

Present

Members:
Deputy Shravan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Deputy Randall Anderson
Ian Bishop-Laggett
Mary Durcan
Deputy John Edwards
Deputy Marianne Fredericks
Jaspreet Hodgson
Alderwoman Elizabeth Anne King, BEM JP
Deputy Natasha Maria Cabrera Lloyd-Owen
Deputy Alastair Moss
Eamonn Mullally
Deborah Oliver
Hugh Selka
Jacqui Webster

Officers:

Baljit Bhandal	-	Comptroller and City Solicitor's Department
Kerstin Kane	-	Environment Department
Tom Nancollas	-	Environment Department
Rachel Pye	-	Environment Department
Gwyn Richards	-	Environment Department
Anastasia Tampouridou	-	Environment Department
Peter Wilson	-	Environment Department
Joseph Anstee	-	Town Clerk's Department
Callum Southern	-	Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Deputy John Fletcher**,** Deputy Brian Mooney, Alderwoman Jennette Newman**,** Judith Pleasance, Deputy Henry Pollard, Tom Sleigh and Shailendra Umradia.

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

There were no declarations.

3. **MINUTES**

RESOLVED – That the public minutes of the meeting held on 29 October 2024 be agreed as a correct record.

Matters Arising

The Deputy Chairman raised the issue of bogus cancellations of the meeting as it jeopardised the decision-making process and noted some members had wrong entries in their diaries and another who believed the meeting started at 10:30am. The Town Clerk indicated he had similar problems in preparation for the meeting and agreed to look into it.

A Member indicated it would be useful to have an explanation for why meetings were getting cancelled and stated that constantly moving the times of meetings was inconvenient. The Member indicated they only realised the meeting was still on at midnight as the meeting had been cancelled in their diary for the week. The Chairman appreciated it was an issue and asked for the Town Clerk to look into it.

4. **60 GRACECHURCH STREET**

The Sub-Committee received a report which sought Planning Permission for the demolition of the existing building at 60 Gracechurch Street which would retain the existing basement and erect a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail/café use (Class E). The report also stated it would provide a free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, a new and improved public realm, highways works, and other works associated with the development.

The Town Clerk referred to those papers set out within the main agenda pack and noted an addendum pack was circulated to Members the day before the meeting with hard copies made available at the back of the room.

Officers presented the application to the Sub-Committee and noted that 60 Gracechurch Street was next to Grey Street on its west side, Fenchurch Street on its north side, the adjacent building at 55 Grey Street in St Benet's place to the south and buildings of 8-12 Fenchurch Street on it's east side.

Officers explained there were heritage assets nearby and included the conservation areas of Bank extending to the West, Leadenhall Market to the north, Eastcheap was to the east and southeast and the Monument Grade One-listed building was located about 150m to the south of the site.

Officers stated that the existing building was built in the mid-1990s to comprise of nine floors above ground, two floors below and to offer predominantly office floor space with retail at ground and lower ground floor levels. They noted the front of Gracechurch Street dealt with level changes as shown on the

presentation on the slides and there was a drop kerb offering entry to the servicing on the site.

Officers stated that the application before the Sub-Committee was for the erection of a 37-storey office-led development which would deliver over 52,000sqm of flexible Grade A, best-in-class office floor space and complementary uses would support its function, including a ground floor café and provision of elevated public spaces at level 35. The site was also located on the southwestern periphery of the City Cluster and was considered to be appropriate for a tall building.

The Officers presented the layout plans of the proposed basement to the Sub-Committee and explained it retained the existing substructures with level 2 providing space for plant and level 1 accommodating cycle parking and end-of-trip facilities in compliance with London Plan policies.

The proposed ground floor plan was shown to the Sub-Committee by Officers who stated it addressed the level changes on the site with the provision of a level ground floor access from the northwest entrance which would give entry to an open and permeable office foyer and a public café. A dedicated cycle entrance was provided at Fenchurch Street which would give cyclists access to the basement facilities. Toward the south, a new public realm, also known as the undercroft, would be formed. Officers noted that works were also proposed for the enhancement of the public realm, including the widening and repaving of the roadways along the street frontages.

A diagram of the undercroft area of the ground floor was presented to the Sub-Committee and Officers explained that it would provide one accessible car parking space and visitor cycle parking to its south. Publicly accessible toilets would also be provided on the ground floor with step-free access from the undercroft. Officers further stated that the area would have a dual purpose, offering a public space in the day and a servicing area during the hours of 11:00pm and 7:00am and it was considered that the provision of the public area would offer enhanced dynamic activation for the area and it was a unique benefit to the scheme and an unusual element to have it.

Officers presented an image of the visitors journey and stated the undercroft, as well as being enjoined in its own right, would also form the main point of arrival for those visiting the elevated public spaces at level 35 of the tower through the formation of a new passageway through a full designed design route which would incorporate cultural references to the site history

An illustration of the undercroft was shown to the Sub-Committee and Officers stated it offered an inclusive space of respite and a gain of over 360sqm of fabric room area which was designed to be highly biophilic and calming space away from the busy streets.

Officers presented a diagram of the proposed first floor and informed the Sub-Committee that it would provide the main office reception and lobby areas to access the upper floor plates. A diagram of the proposed typical office floor

plans were also shown to the Sub-Committee and Officers stated the proposed office spaces were designed with flexibility to accommodate a variety of tenant requirements and the demands of business growth with options that offered a range of interior and exterior environment amenity. The building would also incorporate planted spaces all above the ground floors which would add visual interest and softness to the facades, as well as provide opportunities to provide urban greening.

Officers presented the private amenity space at level 34 of the proposed development and informed the Sub-Committee a more generous private area would be provided which would incorporate extensive landscaping features for the enjoyment of office staff and created a compelling offer for the future occupiers of the building, as well as meeting market demand.

A diagram of the elevated floor space on level 35 was presented by Officers who stated the floor would incorporate the elevated public spaces of the building and offered free of charge indoor and outdoor spaces for the enjoyment of the public and an education room for the use of schools and community groups. Officers also stated the areas would offer exceptional panoramic views to the west and south towards the River Thames and would be made available to the public during the hours of 10:00am and 9:00pm through pre-bookings and walk-ins. Officers noted that the operational management plan of the spaces would secure further details under the Section 106 Agreement. Officers further stated that the provision of such spaces in that location contributed to seven day and evening attraction in the City and complimented the City's environment by offering amenity areas for workers, visitors and residents to enjoy unique views and urban spaces free of charge.

An illustration and diagram of the visitors journey in the public spaces at level 35 was shown by Officers who stated that visitors would be able to continue their journey from the ground level into the sanctuary, which would be an indoor area offering a café, a kiosk and a range of seating options and toilets facilities. They would also have access to a public roof garden.

The Officers presented an illustration of the roof garden and stated that the garden would provide extensive views over the west of the City, in addition to a variety of seating and a high level of soft landscaping features and its design incorporated suicide prevention measures in compliance with the City's planning advice. The design also incorporated noise and wind mitigation measures to ensure the space was safe for use and usable throughout the year.

An illustration of the educational room at level 35 of the proposed development was presented by Officers who stated that the public offer at that level would be different to that already offered in other tall building applications so far and it was considered to be an important contribution to the City's portfolio of elevated public spaces.

The proposed roof plan was presented to the Sub-Committee and Officers indicated the building had been designed to incorporate to fully incorporate

planting. Officers also presented a slide which highlighted the sustainability of the proposed development and stated that the building had been designed to exceed the minimum requirements of the Urban Greening Factor (UGF) and provide biodiversity as part of the sustainability strategy. Officers also stated that it embedded circular economic principles and whole life carbon approaches to minimise carbon emissions, hence the reuse of the existing basement on the site. It also achieved an overall 29% reduction in regulated carbon emissions which exceeded other commercial developments in the City of London recently assessed. Officers further stated that the proposal was targeting a BREEAM 'Outstanding' rating and promoted sustainable development and significant optimisation of the development potential on the site.

Officers presented a diagram of the west elevation and highlighted the spine of green terraces. The existing and proposed diagrams of the south, north and east elevation were also shown to the Sub-Committee. Officers stated that the daylight and sunlight impacts identified were found to be acceptable and were not unusual to the urban city environment.

An image of the LVMF 10A.1 strategic viewpoint from Tower Bridge of the Tower of London was shown to the Sub-Committee and Officers indicated Historic England had not objected, but had raised concerns about the impact the proposals could have on the Tower of London. Officers noted that the development would be on the far side of the Cluster and were satisfied that it would preserve the outstanding universal value of the Tower of London.

Officers also presented images from the LVMF 25A.1 strategic viewpoint at The Queen's Walk at City Hall and the LVMF 15B.2 strategic viewpoint at Waterloo Bridge Downstream of the existing and proposed verified views.

A presentation of a model taken from the LVMF 16B.2 strategic viewpoint was also presented to the Sub-Committee of the cumulative cluster scenario by Officers.

An image of Gracechurch Street looking south with the existing and proposed development shown to the Sub-Committee, as well as another image from the junction looking south which Officers stated showed the current and proposed design. Officers also showed an image of the current and proposed development from Fenchurch Street looking west.

Officers presented an illustration of the façade detail of the proposed development and stated that one could see the terraces which would form a green spine along the western elevation. Officers also presented an illustration of how the ground floors would be glazed, along with the entrance to the undercroft and presented an aerial rendered view of the proposed development.

Officers stated that, overall, the scheme would create over 52,000sqm of Grade A best-in-class office floor space supported by high quality greenery and flexible internal and external office amenity areas which would accommodate over 300 jobs. Officers indicated it would be a significant contribution of floor

space to the City's targets and would strongly support the City's international competitiveness and strategic economic objectives. Officers also told the Sub-Committee that it would be a scheme with considerable social and educational value, delivering a new public and educational destination through a compelling new sequence of spaces, with the undercroft and passageway on the ground floor and the space on level 35. Level 35 would form the internal and external elevated public spaces at the top of the building and the development would be a significant new destination which would support the City's Destination City Agenda. Officers also stated the scheme would be a dynamic and striking work of architecture which would diversify the cluster and would deliver an exceptionally energy efficient, sustainable and green new office building which targeted a BREEAM 'Outstanding' rating and was fully compliant with the City's whole life carbon planning advice note. Officers concluded that the scheme would be a significant enrichment to the diversification of the City Cluster and would meet the City's strategic objectives and deliver a compelling new destination for the City and stated the development was recommended to the Sub-Committee for approval.

The Chairman invited the registered speakers in support of the proposed scheme to speak.

Mr. Connolly addressed the Sub-Committee and stated that Obayashi had an established history of 130 years as a business and a presence in the City since the 1980s with the purchase of Wacken House, the traditional home of the Financial Times. He noted that Obayashi had subsequent acquired both 20 and 60 Gracechurch Street and the application for 60 Gracechurch Street represented a strategic focus in a new build development to increase and diversify the firm's investment portfolio. He stated that the developer had collaborated with Sellar as their development managers, who he indicated would be known from both the development of The Shard and the redevelopment of Paddington Square, along with the developer's consultant team, all of whom had considerable development experience within the City. Mr. Connolly stated that the existing building was in a prominent position on the corner of Fenchurch and Gracechurch Streets was designed and built in the 1990s and no longer met the demands of prime City tenants and, due to its location within the City Cluster, it afforded an opportunity for redevelopment and the developer's ambition for a building that displayed the highest achievable ESG credentials within the cluster. He further stated that the developer sought to deliver the development by 2029 and, thereby, continue to meet the aspirations of both the Corporation and Obayashi.

Mr. Aktar addressed the Sub-Committee and stated that when designing 60 Gracechurch Street, it had been important that the building was part of the ecosystem of Destination City, and should be a distinctive landmark and a tower that should be leading the way in sustainability and user experience. He also noted that understanding the tower's location, its relationship with the nearby conservation areas and the building that is part of the wider cluster of towers had been important factors when studying the site. Mr. Aktar further stated that a series of workshops had been held with the City to understand the site's potential and refine the scheme. Mr Aktar also informed the Sub-

Committee that a thorough townscape study looking at the building in 40 townscape views from distance and up close had been carried out and had formed the design approach to the project. He stated that the proposed development related to three scales, the skyline scale as seen from afar, being part of the cluster; the city scale and its connection to the urban fabric and its surrounding streets; and the user scale, providing quality spaces for people. Mr Aktar stated that looking at the building from a distance in relationship to the cluster, the concept of the development provided a green diagonal ribbon which connected the top of the building with a series of green spaces all the way to the ground and also created a distinctive silhouette that could be experienced from afar. Mr Aktar also explained as one came closer to the building, they could see the tower was divided into two elements, a light transparent tower and a podium. He also stated that the detailing and colour connected it with its historic context at Gracechurch Street and the surrounding buildings. Mr Aktar concluded that the building provided the best-in-class flexible office floor plates with every single floor having access to a green terrace, and the building provided varied working environments for its users, contributed to biodiversity, and the public could access a green garden while enjoying views of the City at the top of the tower.

Mr Davey addressed the Sub-Committee and stated that every element of the 60 Gracechurch Street development had been considered to provide a new beacon of sustainability and that ethos had touched every aspect of the proposal. He also stated that the composition of the development retained significant portions of the existing building and form and function had optimised the systems which would drive down energy and eliminate on-site combustion. Mr Davey told the Sub-Committee that the appearance reflected the developer's ethos by integrating rich planting on every floor which created a green connection from the ground to the sky and, with early and iterative engagement from Officers, had been through an extensive retrofit first carbon optioneering process. He informed the Sub-Committee that nine redevelopment options were assessed at a high level with further detailed interrogation of six options. He noted that using a set of criteria including the overall performance, quality of space and the carbon expended per additional work supported, the developer arrived at the current proposals which retained a majority of the basement and foundations of the existing building. Mr Davey stated that 60 Gracechurch Street would be the most sustainable tall building in the City and no single measure made it sustainable, it was the agglomeration of hundreds of decisions that had been made to date and the multitude that still needed to be made in order to deliver the operate the building. He continued that the developer could demonstrate 60 Gracechurch Street's leading performance as it was tracking the lowest energy performance with a 29% reduction against Part L which set a record for a tall building. Mr Aktar stated that Officers had noted that the proposal's energy performance was an exceptional achievement and exceeded other commercial developments they had recently assessed. He also stated that BREEAM point score of 91.8% at the planning application stage which was also a record for a tall building. Mr Aktar told the Sub-Committee that 60 Gracechurch Street would offer the City's leading wellness and sustainability offer which would outperform the cluster and set a new standard for excellence. Mr Aktar concluded that 60 Gracechurch Street would

be the first of the next generation of tall buildings and hoped it would set a benchmark for others to follow.

Mr. Robinson addressed the Sub-Committee and stated that the public offer vision was to support Destination City by creating a rooftop garden that enabled the public to freely access the unique views over the City. He told the Sub-Committee that it was the first in a new type of curated experiences from street level to sky, which differentiated it from other roof terraces and it was a journey through five spaces and connected users to the location in the City, and enabled learning about the City's heritage and provided important respite from the busy local environment through integrated green planting and design. Mr. Robinson noted it started from the public realm with widened footways to improve comfort for public users and create civic animation at the corner of Fenchurch Street and Gracechurch Street. He also stated that from there, the undercroft could be entered which was a free, safe, green haven off the busy street and was a welcoming space with seating and access to an internal café. Mr Robinson told the Sub-Committee that from that space, there was a passageway with an engaging route which told the history of St Bennett's Church which stood on the site, and was a wide comfortable space suitable for users waiting for either of the two lifts which would take visitors up to level 35. From there, one entered the sanctuary internal space with panoramic views across an external garden which was complimentary to the external garden and enabled the location's use in all weather. As one moved out of the sanctuary, visitors would move into the external garden which was a lush green space and afforded views in multiple directions across the City and captured key sites from the Shard quarter through St. Paul's and the Barbican. He further stated that one would experience planting designed to thrive in the context of climate change, with dry tolerant plant along pollinators to support biodiversity and the roof terrace capacity would be 125 people at any one time, supported by half a million visitors a year. Mr. Robinson stated there was also the learning space, as part of the proposal, and engagement with schools in East London and beyond which fed into its design as a dedicated space for school groups to freely book and use as part of their day trips to the City to see various local sites. Mr Robinson concluded that as the first public garden offer to combine both interior and exterior green space from the street level to the roof, he hoped 60 Gracechurch Street would provide strong social value to all public users as part of its legacy.

The Chairman invited Members to ask questions to the Supporters.

A Member sought to confirm whether all the speakers were working for the applicant and the date of when the existing building was built. A supporter confirmed that all the parties who had spoken in support were contracted by Obayashi and the building was originally completed in 1998.

Another Member sought assurance, in response to planting being pest resistant, that the pests the planting would be resistant to was not butterflies, bumblebees and other 280 species of native pollinators. The Member also asked for an explanation about the duration the building would be vacant during construction and whether meanwhile uses would be reviewed. A supporter

explained that a planting pallet had been designed that would be very persistent to dry seasons, using plants such as lavenders, Amelanchier and Cornus that did not need a lot of water. Another supporter explained that the intention was for the building to be vacant in January 2026 with construction set to begin in the same month.

A Member asked what mitigations would be taken to minimise environmental impact relating to air and noise pollution, especially as larger vehicles would have to service at night and would have to reverse which would produce noise. The Member also queried how the historical integrity of nearby buildings, including the Monument and St Magnus the Martyr, would be preserved as views would be obstructed that would not be available following development. A supporter stated that the undercroft had been designed so reversing would not be required into that space as one would drive-in and then reverse once they were in the loading bay itself. The supporter also stated that there was increased number of electric vehicles in the City and hoped that as it was an open space, noise and any air pollution would be contained purely during the hours of operation and, during the day, the space would be completely open to the public and would not impact on neighbouring properties as there would be no vehicles in that space during the day. The Member suggested the answer presupposed that larger vehicles would be able to use something other than petrol, but that was not the case and there was no reasonable substitute for what was available at the moment due to the nature of technology and particularly around the issue of noise. The Member also expressed concerns that larger vehicles could move into the servicing space and reverse, especially as they would need to reload from the rear. The supporter responded that the undercoft and servicing strategy had been completely redesigned to be a very different space post the proposal being carried out as it currently was and the strategy for delivering and servicing was a consolidated strategy which avoided the use of big wagons and articulated lorries and, instead, using smaller nine tonne trucks that would be limited in their hours of access. The supporter further stated that it would be a more volumetric space than that currently available on site and was optimistic about providing electric charging. Another supporter stated that there would be views looking toward the Monument from the south along Gracechurch Street which would be preserved fully and the view from the south to the north from Fish Street Hill would have the building create a partial backdrop in a kinetic experience walking up toward the backdrop which would be a very similar backdrop to the previously consented scheme at 55 Gracechurch Street. The supporter further stated that the flaming orb at the top of the Monument would not be backdropped. As for the legibility of the church, the supporter stated that no harm had been identified as there would not be a very direct backdrop and would still be part of the backdrop of the cluster.

The Chairman invited Members to ask questions to the Officers.

A Member stated they understood that the proposed cluster counter lines were the maximum heights that were proposed to balance the weight of concern around the City along with what was appropriate and questioned why another application had been received for consideration that went above the lines

before the inspection stage. The Member also asked how much above the lines the height of the proposal was and why it was above the lines. Officers explained it was 2 metres, the lines were at 160m and the scheme's highest point was at 162m. Officers stated that the scheme came forward in design evolution as the contour lines were being developed which was one reason why they did not align. The second reason why it was considered acceptable was because there were no adverse impacts on views flowing from the scheme, so the contour lines in that area were designed to keep the scheme invisible from Fleet Street, and the proposed scheme was. Officers further stated that it was, therefore, a small technical breach of the contour lines in a very localised area, and while the City Plan was emerging and was about to go out in examination in public, it could only be given a certain amount of weight over the adopted 2015 development plan against which the scheme was considered. The Member queried that if Officers were aware it would be above the contour line whether they would have shifted the height in the plan. Officers confirmed that as they were finalising and setting the contour lines, the scheme had also finalised and settled its height. After the two had been compared, it was concluded that the breach was very minor and, most crucially, there was no adverse impact on the strategic views in question and why it was considered acceptable.

A Member stated they understood that the upper area of the garden area conformed to suicide prevention measures but queried how high the balustrades were on the terraces. The Member also stated that the bike entrance on Fenchurch Street was a very busy pavement and, although the footway had been extended into the road since Covid, it was still busy and noted that the pavement 20 Fenchurch Street ("the Walkie-Talkie" building) was set back from the road to allow for evacuations in the event of an emergency. The Member asked what could be done to improve the space around the bike entrance given it was a busy junction. Officers stated that an assessment had been carried out in the Section 278 agreement to secure the widening of the pavement to meet the appropriate level of comfort and there were also works in relation to traffic to the islands and the junction of Fenchurch Street and Gracechurch Street itself. Officers further stated, with regard to the business of the bike entrance, that cyclists would dismount at that point and travels plans had been secured through the Section 106 obligation which was commensurate with what had been seen on other schemes in terms of access into a building from cyclists with existing entrances along Fenchurch Street. Officers explained fire refuge strategy fell under separate legislation and different licensing of the building with regard to appropriate gathering spaces and the developer would need to clarify that.

The Member also raised a question on the impact of the height of the development on nearby heritage assets and why a modest reduction was not considered. Officers responded that various measures were taken to adapt the design which including looking at the levels and position of the rooftop stories to minimise the impact of heritage assets. Officers stated they concurred with English Heritage on harm to the Monument and to Tower Bridge, but in those cases the impact was fleeting and could be minimised and mitigated through

design to a point where can be taken into a balance and weighed against the strengths and public benefits of the scheme.

Another Member sought clarification on the Whole Life Carbon (WLC) emissions figures and requested graphs illustrating the data be made landscape. An Officer clarified the figures in the graphs and stated that initially the scheme had been calculated with the RICS measure which meant made it difficult to compare to GLA benchmarks. Therefore, it was then measured in accordance with GLA guidance. In response to further questions, Officers explained that the measurements were similar and, in both cases, and calculation methods, they both still achieved the GLA standard benchmark of 950kg of CO2. Officers also explained that carbon emissions were slightly reduced using the old calculation method while the new calculation method added more detail to the calculation. that during the carbon optioneering, applicants had been asked to use decarbonised data, whereas in the application scheme, the GLA required applicants to use non-decarbonised data which made a big difference in overall carbon emissions and that during optioneering Officers ensured that the same method was calculated using the same assumptions. Officers continued that from the carbon optioneering exercise, one could see, for example, that Option 7 had the lowest carbon emissions overall out of all the tower options, whereas Option 4, a 12-storey scheme retaining the building with five additional storeys would have reduced carbon emissions due to less development.

The Deputy Chairman noted that the summary table indicated a loss of retail and sought an explanation for why it would be acceptable. The Deputy Chairman also asked for confirmation that it would be a consolidated 32 vehicles a day servicing the building. Officers explained that there was an existing retail unit of over 1000sqm on the north frontage of the existing site, which was working hard with level changes on Gracechurch Street and, for that reason, it provided a very poor shop front and did not activate the frontage. Therefore, the proposed scheme re-provided 187sqm of retail in the form of a café area in the south side of the ground floor of the building. Officers stated that the applicant would be able to change from retail to office without the need to seek planning permission and this formed as part of a fall-back position and it was highlighted that the proposed ground floor now addressed the level changes on the side with the provision of a level ground floor plate. Officers further noted that the new location of the retail made better sense as it now connected directly with the undercroft which formed the main point of arrival for visitors of the elevated public spaces and would activate Gracechurch Street. On the issue of servicing, Officers explained that it would be 117 trips a day without consolidation, with consolidation it dropped to 32 trips.

A Member raised the issue of wind as they had walked near the ‘Walkie-Talkie’ building frequently and indicated it could be very windy in that area and was also an issue of Fenchurch Street as the wind did not have to be fast for it to create a howling effect. The Member asked, given previous comments about the wind not being an issue with other developments, what impact the proposed development would have as they were sceptical of wind measurements. Officers stated that there were some safety exceedances in locations that were

already there and the proposed development did not change the levels of the wind categories. With the proposed development in place and some cumulative schemes, there was only one measurement location outside the secondary entrance of the retail unit at the ground level of 41 Gracechurch Street and there were no mitigation measures for that. However, Officers further stated that because it formed a secondary entrance, people would use the main entrance which was not affected by the proposed development and, overall, the ground floor conditions would remain within the acceptable wind conditions for the intended use.

The Member sought further clarity on wind conditions on the lower-level terraces, the podium and the upper terraces and the garden as the report mentioned some conditions would range from frequent sitting to standing and queried how viable planting would be given the wind conditions. The Member also asked how safe it would be at the public spaces on taller floors. Officers explained for the intended purpose of those areas, and in terms of planting, that the wind conditions were deemed to be acceptable as set out in the report.

A Member stated they were concerned that a building from 1998 could be knocked down and replaced with a structure much taller and approximately three times the total carbon emissions of the existing building and be considered the most sustainable building in the City. The Member further stated they felt it was a problematic building and were concerned about the breach of the contour lines and felt Historic England were well placed to comment on whether the development had a real impact. The Member stated that the London Borough of Tower Hamlet still objected to the application and when one looked across the river, it would draw attention away from the heritage asset. The Member felt this was not an application that, on balance, could be accepted as they were concerned about the loss of daylight and sunlight, as well as Historic England's comments and the sustainability implications.

Concerns were raised by a Member of the loss of retail and they felt there was an impact regardless of whether the pavement would be widened as the bike entrance would create obstructions for the pedestrian and the main entrance was on the corner of two very busy pedestrian junctions which was problematic. The Member also stated they were concerned that it was not an old building being knocked down and felt there was not a lot in the way of public benefits and felt there were already a lot of viewing galleries and learning centres in the City. The Member further stated they were concerned with the impact on heritage assets and stated it was interesting to see 55 Gracechurch Street had now elapsed and felt it provided an opportunity to rethink the space just outside the cluster and its impact on the heritage of the Monument, the Tower of London and Tower Bridge. The Member concluded that they were concerned a modest reduction in height was not negotiated as Historic England felt it would make the proposal more acceptable.

The Deputy Chairman felt the view from the South Bank did not present any harm to the Tower of London and stated, in relation to points raised regarding carbon, that the new building was bigger than the existing building and inevitably had a much higher carbon embedded penalty, but the point of the

new buildings was that they had far superior operational carbon per square metre. He further stated it was an extremely valuable piece of land which had unparallel connections and felt the current building was not earning its keep in terms of the economic contribution it made to the City. He concluded that the proposal was very different from what was already in existence as it was open air and there was only one other open air, high public space in the City which was very popular and felt it would be beneficial. He concluded that he strongly supported the application and urged the Sub-Committee to do the same.

A Member stated they wanted to pick up on the whole life carbon debate and felt the underuse of space was the issue which was why a larger building was more efficient and fundamentally the right thing to do. The Member stated they regretted the previous developments from the 1980s and 1990s that they felt were inefficient and not maximising the space, but now proposals were. The Member stated they would support the scheme.

Another Member indicated they usually queried about toilet provision and stated they were delighted with their provision in the proposal. The Member also stated the proposal seemed to have covered issues such as mobility, scooter space, quiet rooms and multi-faith rooms and felt the proposals on the circular economy were excellent.

It was stated by another Member that policy asked applicants to put roof gardens in tall buildings and felt applicants could not be blamed for doing exactly as asked. The Member felt the main public benefit was the new floor space which would deliver office space that was needed in the City.

Assurance was sought by a Member on whether public toilets would be delivered as other applications, following revisions, had amenities removed either during construction before the building was completed and after completion as the provision of public toilets was critical to the smooth operation of the City.

The Chairman stated he considered that rooftop terraces should offer something that was not already there for visitors to experience, and the proposed development offered views to the West that were unique and would be distinctive to what was already on offer by other rooftop terraces. The Chairman further noted that the rooftop terrace would be one of only two that would be outdoors and would offer opportunities for rest and to enjoy the outdoor space. In addition, the Chairman stated that there had been a 10% increase in employment in the Square Mile in the last 12 months and the part of the Local Plan which identified 1.2 million square metres was based on figures hat would show growth in 2051 to be about 730,000 employees. The Chairman stated that the City was already at 678,000 with the growth that had been had in the last twelve months and felt the need to maximise floor plates was exceptionally important and it was critical that floor plates and available footprints were maximised in the Eastern Cluster as 85% more floor space would be required by 2040 in the Local Plan. The Chairman further stated that there was increasingly strong language coming from heritage groups and felt the Sub-Committee needed to make sure it kept a balanced approach in how

heritage was regarded, harm against economic growth in the Square Mile. The Chairman further noted that while Officers could work hard on relationships with heritage groups, the Sub-Committee had to make the call on whether there was heritage harm or not which was subjective and felt he could not see how the Tower of London was affected by the development. The Chairman concluded that he would support the scheme.

The Chairman moved the meeting to a vote.

Votes were cast as follows: IN FAVOUR – 9
AGAINST – 4
ABSTENTIONS – 0

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) 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.

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

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

RESOLVED – That the report be noted.

6. *** 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.

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

A Member asked Officers to give consideration to ensuring the carbon optioneering data in reports was presented in a more comprehensible way to Members. The Chairman noted it was a complex subject matter and asked Officers to look at providing data in a more quantifiable way.

A Member requested the Chairman to reflect on language used in relation to the wording of statutory consultees comments sometimes being aggressive and queried whether the increasingly strong language came from a place of increased concern from groups who were spending time providing information to the Sub-Committee to inform decisions on applications. The Chairman stated that the Sub-Committee worked with all statutory consultees on an even footing and did not believe there was a negative bias against any statutory consultee that the City worked with. In addition he had a direct relationship with some of the groups considered their language had become increasingly aggressive over time and that his language had therefore been appropriate.

In relation to a Member's comment that some statutory consultees blurred the boundaries between their statutory role and tried to advise on other matters which strained to a more general planning debate and queried whether this was something the Chairman considered was increasing. The Chairman noted that relationships ebbed and flowed and gave a recent example of bridge-building in that he now had a direct relationship with the Chairman of Historic England and spoke with them on a regular basis whenever concerns were raised. The Chairman stated that relationship had not been in place previously in the last few years and felt some of those bridges were being re-built, but it did not stop the flow of work between Officers. He added it did take time to get right and people needed to understand their scope of work

Another Member stated they would be surprised if statutory consultees thought they were blurring the lines as they would comment on applications in a standard way for each local authority they responded to. The Member also

raised concern about any suggestion that Members were anti-Officers as they that Members recognised the time Officers spent writing reports and undertaking due diligence to enable the Sub-Committee to make decisions. He added that it did not make Members anti-City if they had a different view from the majority opinion. The Member hoped that those who sat on the Committee were seen as people who took a lot of time and effort to arrive at a decision and should not be made to feel that if they dissented with a different view, they would be shut off or might not be reappointed The Chairman indicated he did not read statutory consultees comments to other local authorities. He also stated he agreed with the Member's comments that Members should not feel pressurised into voting a particular way. The Chairman also noted that every ward had representation and, once on the Committee, it had to behave as a planning committee collectively and stated he had no power over who was appointed to the Sub-Committee.

8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There were no additional, urgent items of business for consideration.

The meeting ended at 10.25 am

Chairman

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

PLANNING APPLICATIONS SUB-COMMITTEE
Friday, 13 December 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Friday, 13 December 2024 at 10.00 am

Present

Members:
Deputy Shravan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Deputy Randall Anderson
Mary Durcan
Deputy John Edwards
Anthony David Fitzpatrick
Deputy John Fletcher
Deputy Marianne Fredericks
Jaspreet Hodgson
Amy Horscroft
Alderman Robert Hughes-Penney
Alderwoman Elizabeth Anne King, BEM JP
Deputy Natasha Maria Cabrera Lloyd-Owen
Antony Manchester
Deputy Brian Mooney BEM
Eamonn Mullally
Alderwoman Jennette Newman
Deborah Oliver
Deputy Henry Pollard
Ian Seaton
Hugh Selka
Tom Sleigh
William Upton KC
Jacqui Webster

Officers:

Fleur Francis	-	Comptroller and City Solicitor's Department
Gemma Delves	-	Environment Department
Rob McNicol	-	Environment Department
Gwyn Richards	-	Planning and Development Director
Tom Nancollas	-	Environment Department
Katie Stewart	-	Executive Director, Environment Department
Anna Tastsoglou	-	Environment Department
Polly Dunn	-	Assistant Town Clerk
Callum Southern	-	Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Ian Bishop-Laggett, Deputy Edward Lord, Judith Pleasance, Alderman Simon Pryke, Shailendra Umradia and Deputy Dawn Wright.

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

At Deputy Lord's request the following statement was read out by the Town Clerk.

"Having reviewed the papers for this Friday's meeting of PASC and taken independent professional advice, I understand that I continue to have a disclosable pecuniary interest in item 3, 1 Undershaft, due to a potential commercial relationship between the developer and the Leathersellers' Company, of which I am a member.

I will therefore not be present for that item.

As to item 4, Bury House, it is likely due to a duty as Deputy Governor of the Honourable the Irish Society, which is hosting the Freedom of the City for Lady Mary Peters LG DBE OLY, that I would be unable to remain for the full debate.

As a consequence, I must tender my apologies for absence for the whole meeting"

Deputy Lord was therefore not in attendance.

Jacqui Webster had also flagged the following:

"The Leathersellers Company have an interest in Agenda Item 1.

My organisation benefits financially from and has a relationship with the Leathersellers Company.

I sought brief advice for the July meeting.

However, further funding has been granted, and the relationship has deepened and in line with a review with my trustees this morning, the new Charity Governance Code and my organisation's declaration requirements, I am declaring an interest in agenda item 1."

Anthony Fitzpatrick declared that he would not be taking place in the vote on Item 3 – 1 Undershaft as when the plan was originally brought, the Alderman and Common Councillors for the ward of Lime Street had actively engaged in a round table that was hosted at Lloyds of London in February 2024. The Alderman and councillors had relayed the sentiments of businesses and individual votes and had a number of meetings with Eric Parry and the developers at Stanhope and had addresses a meeting of the ward club to present the new proposals. He now considered it inappropriate to take part in the debate and vote on this item and would therefore not do so.

Alistair Moss declared that he had a professional conflict with items 4 and 5 and would leave the room for those items.

Jaspreet Hodgson declared a non-pecuniary interest in Item 3 as it mentioned the Port of London Authority and informed she was a Member of the Ten Trinity Square Private Members' Club.

3. **1 UNDERSHAFT, LONDON, EC3A 8EE**

The Sub-Committee received a report which sought Planning Permission for the demolition of existing buildings at 1 Undershaft, the retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building (plus plant) for office use; retail, food and beverage, public amenity space, publicly accessible education space and a viewing gallery at levels 72 and 73, public cycle hub, plus podium garden at level 11, the installation of a digital screen, public realm improvement works ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

The Chairman invited Officers to make a presentation to the Sub-Committee.

Officers presented the existing site plan to the Sub-Committee and stated that the application included a 28-storey vacant office tower, an area of space known as St Helen's Square and Undershaft. The development was bounded to the north by St. Helen's Bishopsgate, to the east by St. Mary Axe, to the west by the 'Cheese Grater' and to the south by Leadenhall Street.

Officers highlighted that Members deferred the scheme in July 2024 and had asked the applicant to look at making minor adjustments to the proposal in relation to the ground floor public realm. Officers stated that the applicant had since revised the lower levels of the building and an updated proposal was before the Sub-Committee.

Officers recapped on the details of the existing site and noted there were a number of heritage assets in the vicinity, notably St. Helen's Bishopsgate to the north, St. Andrew Undershaft to the east, the Lloyds Building to the south which were shown in purple on the presentation. Officers stated that a thin sliver of the north of the site was within the St Helen's Place Conservation Area and the site was within the City Cluster. The Officer presented an image of the Eastern / City Cluster policy area in the adopted and emerging Local Plans and explained this was an area of the City that had to work hard to accommodate growth to ensure that economic objectives and competitiveness were maintained. Officers further stated that the are wawas appropriate for tall buildings and the application site was represented by a red dot on the presentation and was broadly at the heart of the Cluster.

Officers presented an image of the aerial view of the existing site and stated it was a 1960s tower that was remodelled in the 1990s and was now subject to a certificate of immunity from listing. Officers noted the site did have an extant

consent for a new officer tower that was granted in 2019, and the 2019 scheme had recently been technically implemented through some demolition works on the site for context. Officers explained that the consented tower was 73 storeys at a height of 304.94m AOD and the proposed for consideration today was 74 storeys and 309.6m AOD.

Officers presented an image of the existing building from street level with a view of the front of the building and St. Helen's Square.

The Sub-Committee was also shown an image of the existing site from the west side of the building by Officers who described the area as an underutilised space dominated by bollards, railings and a ventilation shaft, as well as the Undershaft carriageway. Officers also presented a view of the existing site looking east along Undershaft toward the Gherkin and another view looking south along St. Mary Axe where Officers noted one could see the Lloyds Building in the background and the application site in the foreground. Officers also presented an image of the existing site looking west along Undershaft where Officers stated one could see the entrance to the servicing ramp for the existing building which was quite unsympathetic to the setting of the church.

Officers presented an aerial view of the proposed scheme and stated that the existing tower would be demolished and replaced with a 73-storey office tower that would deliver 153.602sqm of Grade A office floor space and supported 8,759 jobs. Officers told the Sub-Committee that the proposal was strategically significant to ensure the City maintained its economic competitiveness and would deliver, alongside the office space, complimentary public spaces, including the tallest viewing gallery at level 73, a high-level education space referred to as the classrooms in the sky at level 72, a restaurant at level 2, food and beverage offers at level 11, cultural spaces and a level 11 podium garden.

Officers stated that St. Helen's Square and the surrounding public realm would be transformed and the scheme would optimise the most strategic site in the Cluster.

An overview of how the massing of the building had changed since July 2024 was given by Officers who showed the Sub-Committee an image of the original scheme changes presented in 2024 and the revised building outline to the Sub-Committee. Officers noted that the focus had been on the lower levels of the building only and the upper levels would remain as previously proposed and highlighted that the green line represented the building outline proposed in July and could be seen in relation to the new outline from ground floor to level 3. Officers informed the Sub-Committee that the building would be set back by 10m which allowed more of St. Helen's Square to remain as public realm than previous proposed and there would be a reconfiguration of the building at level 11 which resulted in it coming further south by 7m.

Officers presented an image of the existing basement 3 and the proposed basement 3 and stated the existing basements would be retained, extended and reconfigured. Officers also presented an image of the existing and proposed basement 2 which accommodated policy compliant levels of long-

stay cycle parking and end of trip facilities. An image of the existing and proposed basement 1 was also presented by Officers who stated it would include a publicly accessible short-stay cycle hub that had been proposed in green and, as part of recent revisions to the scheme, a further area of basement would be extended as was shown in the blue outline.

The existing and proposed ground floor plan image was presented to the Sub-Committee by Officers who told the Sub-Committee that the proposed footprint would be bigger than the existing floor plan as it needed to work hard to deliver the necessary facilities to serve a building of the proposed size. Officers presented the original scheme changes from July 2024 and the revised building outline on the ground floor level which Officers stated clearly showed how the footprint of the building had changed with the 10m set back at the southern end and the massing redistributed to the west. Officers also presented an image of the ground floor amendments and stated that the previously proposed triple height lobby that would take people up to the level 11 podium garden was no longer proposed to allow the building line to be pushed back and office space would continue to be on the east side of the building, as was shown in yellow on the image, as well as an office reception, and a Changing Places toilet was proposed, as was shown in blue on the image. Officers stated that parking access would now be on the northwest corner of the building, as was shown on the image in pink, and the building would continue to be serviced from a new entrance at St. Mary Axe. Officers informed that enhancements were proposed to the public realm which surrounded the site. An image of the proposed ground floor entrances was also shown to the Sub-Committee by Officers who stated that it showed how the floor space reconfiguration would change the proposed entrance arrangements, and a single consolidated public entrance point was now proposed on the southwest side of the building. Officers told the Sub-Committee that users would take the lift or stairs to a new public lobby at level 1. From there, they would travel to the public spaces within the building and the revised positioning of the cycle parking entrance meant that cyclists did not have to pass through the public realm with their bikes.

Officers presented an image of the level 1 floor amendments and stated that a new public lobby was proposed that would accommodate space for the necessary lifting and security arrangements to allow people to access the public uses in the building.

An image of the proposed public podium floors at level 2 and level 3 were shown to the Sub-Committee by Officers who explained that, as part of the revision, the cultural and restaurant space had moved to levels 2 and 3 as, in previous proposals, levels 2 and 3 were office space and the culture and restaurant space was located at levels 9 and 10. Officers further stated that the positioning of those uses had been revised in order to better activate the lower levels of the building and make the public uses more visible from the surrounding public realm.

The Sub-Committee was presented with an image of the existing typical office floor plan and the proposed typical office floor plans for Zone 1 (levels 4-9) and Zone 2 (levels 14-29) by Officers who stated that it reflected how the building

form changed as it elevated. Officers also told the Sub-Committee that the office space would be suitable for a range of occupiers and an element of affordable workspace was proposed on the lower levels of the building. Officers further stated that the proposed office space would be befitting for the central cluster location and, in line with market demand and post COVID requirements, the office space would be complemented by generously sized and planted amenity terraces for the office occupiers. Officers presented the Sub-Committee with a CGI image of one of the proposed terraces.

Officers presented an image of the existing and proposed east elevation on to St. Mary Axe to the Sub-Committee and stated that the elevation images would show how the development would optimise the site through uplifting floor space and the increase and in height and massing would result in some daylight and sunlight impacts to nearby sensitive receptors. Officers considered this acceptable given the site context. Officers also presented the existing and proposed south elevation onto Leadenhall Street, the existing and proposed west elevation which faced the cheese grater, and the existing and proposed north elevation which faced onto Undershaft. Officers showed the Sub-Committee an image of the existing and proposed cross-section and stated one could see the public uses woven into the office space.

Officers stated to the Sub-Committee that the building would be contextual and would bring a series of interesting architectural approaches and high-quality design to the cluster which would range from the pale faience elevations which fanned out from the base to the podium garden which was shown to the Sub-Committee. Officers noted it would be suspended 42m above ground level and highlighted the zinc and enamel cladding of the main office tower. Officers further stated that it would be sustainable and would optimise circular economy principles through the reuse of the existing basement, the incorporation of facades optimised for shading, and it would be fully electric.

An image of the proposed crown of the building was presented to the Sub-Committee and Officers stated that the crown of the building would be picked out in subtle colour to reflect the civic functions of the top of the building and would form the apex to the cluster.

A presentation of the Tower of London from the existing and cumulative strategic view of LVMF 10A.1 was shown and Officers stated the development would have a striking and understated presence. Officers also presented a view of the cumulative development from Inner Ward in the Tower of London and told the Sub-Committee the development would be seen as essential to the modern skyline of the cluster and distinct and disassociated from the World Heritage Site.

Images of the existing and cumulative strategic view of Queen's Walk (LVMF 25A.1) were shown to the Sub-Committee. Officers told the Sub-Committee that the building would be the apex of the cluster with other towers descending from it.

Officers presented images of the previously proposed public spaces and cultural offer and the proposed public spaces and cultural offer and noted that more of the public uses would now be located at the lower levels of the building. Officers also presented an image of the public amenity floors and explained that the Museum of London education space would be a classroom in the sky at level 72 and, with the viewing gallery at level 73, both would be accessed from level 1 via the public lobby. Officers also presented images of the spaces in plan form and the classroom in the sky concept. They explained that the space would be curated by the Museum of London and would be a space where children could visit and learn about the City. Officers also stated that the Museum of London activity on the site would be complementary to that of its Smithfield site.

An image of the viewing galley was presented to the Sub-Committee and Offices stated it would offer different views to other viewing platforms in the City.

Officers presented an image and diagram of the level 11 podium garden and told the Sub-Committee it would be a significant architectural achievement and would be a generous, unparalleled public space that offered different views. They also noted it would be generously planted and have good microclimatic conditions. Images of the previously proposed, in July 2024, and proposed level 11 podium garden were shown to the Sub-Committee by Officers who explained that the floor space had been reconfigured while it still provided food and beverages and cultural and public spaces to complement its function. Officers further stated that as the public entrance point at ground level had changed, the arrival point on the podium had also changed, with people arriving on the west side of the terrace instead of the southern end. They also noted it was also proposed that the southern end would be a winter garden, that the public could use, which would increase the year-round appeal of the space.

Another image of the level 11 podium garden was shown to the Sub-Committee and Officers stated a feature of the podium garden would be the oculus, a circular area of walkway on structural glazing which would give views to ground level 42m below.

A diagram of the continuous city public realm was presented to the Sub-Committee by Officers who explained that the public realm would be enhanced and the north-south and east-west walking routes highlighted would be optimised and designs for St. Helen’s Square had been revised since July 2024. Officers stated that the revised proposal created Undershaft Square to the west of the building.

Officers also stated that the proposals included an extensive Section 278 agreement for the whole of St. Mary Axe and part of Leadenhall Street to the south which would be transformational and could include the rebuilding of the footway and carriageway to seek to improve the pedestrian environment. Officers also explained it presented an opportunity to remedy some issues on the street through a redesign and the street would be built in the City of London technical pallet of materials which would harmonise with the look of the

adjacent streets and public spaces. An image of St. Mary Axe of the proposed Section 278 works was shown by Officers to the Sub-Committee.

In reference to the ground level experience of the scheme, Officers presented a view of the existing and proposed building from Lime Street looking north and stated that one could see the introduction of a new screen and the podium of the oculus. Officers also showed an image of the existing and proposed building from Lime Street looking north from a closer angle and Officers noted that one could see the proposed base of the building in the proposed version which fanned out with the podium garden above.

Officers also presented images of the existing western public space, the proposed space in July 2024 and the proposed space for December 2024. They stated the area had been worked up in more detail and would become Undershaft Square with further landscaping and greening.

Images of St. Helen's Churchyard as it existed and as proposed were presented to the Sub-Committee and Officers stated there would a clear view to the public uses of the lower levels of the building.

An image of the existing and proposed views along St. Mary Axe were shown to the Sub-Committee.

Viewpoints of the existing servicing area view and the proposed view from Undershaft looking west were presented to the Sub-Committee by Officers who highlighted the carriageway moving northwards in the proposed view and the removal of the existing servicing entrance. Officers explained that, as shown in the image, servicing would take place from the corner of Undershaft and St. Mary Axe and deliveries would be consolidated and off-peak with final details being secured by a delivery and servicing management plan.

Officers presented the proposed cycle access and noted the cycle parking entrance would be at the western end of Undershaft.

Existing and proposed views across St. Helen's Square looking toward St. Andrew Undershaft were presented to the Sub-Committee by Officers who stated that the proposals would create a new civic space in the heart of the cluster. The existing steps, level changes, hard edges and planters shown in the existing image were to be removed and Officers further stated that the new space would be simplified completely at grade to make it more accessible and inclusive. Officers noted it would have a grove of trees and new seating.

The existing and proposed ground floor plan which showed the public space around the building was presented to the Sub-Committee by Officers who informed that the footprint of the proposed building would be bigger than as it existed as it worked hard to deliver what was required to make the building of the proposed size function. As a result, there would be some loss of St. Helen's Square. Officers showed diagrams of the existing square per mile area of St. Helen's Square, the proposal of July 2024 and the current proposal to the Sub-Committee and explained that the amount of the square that would be lost

would be smaller than that proposed in July 2024 as the southern edge of the building had been pulled back by 10m. Officers further stated, while they presented a diagram of the square per mile of the public realm at the podium garden, that when both the podium level garden and the ground level space was taken as a whole, the scheme would overall delivered an uplift in the quality and quantity of the public space.

Officers presented an image of the previously proposed scheme in July 2024 and the proposed St. Helen's Square and stated the existing level changes would be removed and more usable space would be created for trees and seating. Officers also told the Sub-Committee that the screen would activate the public realm and could be used to show art displays and sporting events and informed Members that the content of the screen would be controlled through a Section 106 agreement.

An image of the revised proposed new public entrance off St. Helen's Square was shown to the Sub-Committee by Officers who told Members it would be clearly defined with colour to match the way that the colour was used at the top of the building to denote civic use.

A visual of the proposed level 1 lift portal, which would be located off St. Helen's Square, adjacent to the main stairs, was also shown to Members by Officers who stated it was clearly defined in red.

Officers displayed another visual of the proposed St. Helen's Square viewed from Leadenhall Street.

Another visual of the proposed St. Helen's Square was shown by Officers who stated that it was the Undershaft square and would form part of the route between St. Helen's Square and Undershaft and further stated that one could see the relationship between the public uses within the building and the public realms.

Officers summarised that the proposed scheme delivered over 153,000 square metres of flexible, Grade A, best in class office floor space, which accommodated up to circa 8,759 jobs and it would be a significant strategic contribution of office floor of the utmost importance to the City's economic objectives to maintain its international competitiveness, as well as strengthening the economic base of the City Cluster. Officers further noted that it would be a scheme with the highest social and educational values and credentials and would deliver the highest elevated public cultural space and classroom space in Britain. Officers stated that the space would be curated by the London Museum at the apex of the City Cluster of tall buildings and would be free to visit and inclusive. They also stated that the proposals delivered a striking free to visit new public space in the form of a podium garden which was an unparalleled new elevated public space and created an iconic new destination at the heart of the cluster which would support the City's cultural 7 day and evening objectives. Officers further stated the proposal would be the totemic centrepiece and backbone of the cluster and would be an outstanding architectural moment at the heart of the City. Officers told the Sub-Committee

that the scheme would carry exemplary sustainability credentials, targeted a BREEAM 'Outstanding' rating and was designed with circular economy principles to address climate adaptation and mitigation. Officers also stated the scheme would provide significant improvements at ground floor level which included the transformation of Undershaft and St. Mary Axe and noted that there would be a reduction in the extent of the ground floor public realm as a result of necessary facilities needed to service a building of key strategic importance to the City to deliver the office floor space it needed. However, Officers stated that the new reimagined ground floor public realm would provide a significantly more enhanced, inclusive and flexible St. Helen's Square in quality terms and a reimagined public space at the heart of the cluster. Officers told the Sub-Committee that it was the single most strategic site in the cluster and the City and it was vital that optimised floor space capacity was sought on the site to remain internationally competitive in the years ahead. Officers noted the need to balance that with the provision of high-quality public realm and other planning considerations. Officers stated they firmly believed that the scheme achieved the balance and recommended approval of the proposals to the Sub-Committee.

The Chairman informed the Sub-Committee that there were no Objectors to the application and invited the Supporters to address the Sub-Committee.

The Town Clerk explained to speakers that they would have a total of 10 minutes to address the meeting with no one person being able to speak for longer than 5 minutes. The Town Clerk also explained the traffic light system to speakers.

Mr. Paul, from DP9, addressed the Sub-Committee and noted they had been hard at work since the last meeting when the Sub-Committee had asked for the approach to the public realm to be reevaluated and Mr. Paul stated they had done as asked. He noted that the work had taken place in consultation with those who attended the last Sub-Committee meeting on the proposal and a consensus had been reached. Mr. Paul referred to a letter from the Lime Street ward team, along with correspondence from neighbours at 122 Leadenhall Street, that supported the changes and further noted that Lloyds had also withdrawn their objection to the application. Mr. Paul informed the Sub-Committee that the outcome of the review had been a positive one and the overall design had benefitted from the critique. Mr. Paul thanked all those who were involved.

Mr. Hyde addressed the Sub-Committee and stated he was aware there may have been Members present were not present at the Sub-Committee meeting in July 2024 and informed Members he would brief summarise the proposals before he moved on to introduce the amendments that had been made. Mr Hyde also noted that Mr. Lim was in attendance who represented the owners. Mr. Hyde stated the owners had been instrumental in securing the 2019 planning consent and remained fully committed to taking the development forward. Mr. Hyde told the Sub-Committee that at just under 310m tall, the building would be the tallest in the City, London and the UK and it retained it totemic form from 2019. He informed Members that the two uppermost floors

were fully public spaces and was pleased to confirm continued collaboration since 2015 with the London Museum to provide the learning centre. He also told the Sub-Committee that the proposals would provide over 153,000sqm of the best-in-class office space with access to local terraces on the floors, as well as common landlord amenities and outdoor gardens at the main terraces. He explained this alone would represent around 10% of the forecasted occupier requirements in 2040as was evidence by the City's own research. Mr. Hyde stated that the office areas were of different sizes and characters and allowed for flexible occupation for the widest cross section of workplace requirements. A lot had been learned from other tall buildings, and the building would not only be lean in embodied carbon but would operate very efficiently. He continued that in addition to the contribution of space for business, the building epitomised the City's desire to be a destination for all and provided over 5000m^2 internal areas and around 6,500m^2 of external public paces at grade and level 11. Mr. Hyde drew attention to the elevated public garden and its own ecosystem of public amenities at level 11, as well as other public areas lower down the building which included a restaurant. He further stated that generous, vibrant, accessible and flexible public realm at grade had been proposed which fully supported the Eastern City BIDs' recently launched public realm strategy and had recently been endorsed by them. He further noted that there were extensive future Section 278 works to improve St. Mary Axe. Mr. Hyde concluded that a number of comments and questions regarding the spaces had been heard in July 2024 and hard work had been done through the summer, in collaboration with local ward Members and other stakeholders. Mr. Hyde indicated that the input had been appreciated and was pleased that they were now supportive of the proposals.

Mr. Parry addressed the Sub-Committee and told Members that it was a generous building and there was an aspiration for it to be a next generation classic of its kind, both for the public and for occupants. He stated that it had been modelled to provide a series of urban horizons at the street level, the elevated public garden amenity floors, the London Museum, classrooms and a viewing gallery at the apex of the building. He also told the Sub-Committee it was a building of character with facades designed for longevity and calibrated for performance and was not another glass tower. He added that the step massing provided a range of floor plates to attract future tenants in the sustainable development. Mr. Parry stated that the redesign of the lower levels had improved both the public realm and the engagement on the three active frontages; to the north, Undershaft with a reposition cycle hub entrance, along St. Mary Axe through improvements under Section 278, and the western pedestrian route which connected St. Helen's with Leadenhall Street. He added that the redesign for St. Helen's Square had been enlarged by setting back the base of the building by 10m, so 80% of the existing public space at ground level had been retained. This would allow more flexible use by the local communities in a fully accessible square with an enlarged grove of trees, more seating, and a new focus with a large public screen curated to support Destination City. Mr. Parry stated, secondly, that Undershaft Square, the current space behind the Leadenhall Building, could, by a relocation of the cycle hub entrance, be reimagined as a quiet space for nature and connected to the public garden above. Thirdly, Mr. Parry stated, in relation to public access, that a single public

entrance, which replaced the previously proposed two entrances, would now be directly off St. Helen's Square with a civic scaled stair and two fully accessible lifts which allowed entry to level 1, while the public lift served levels 2 and 3. He also noted the public garden at level 11, as well as the two lifts that served te top of the building and stated the public spaces had been designed for the flow of visitors and the provision of security screening that would be necessary. Mr. Parry added that by relocating both the restaurant and some cultural uses to lower podium levels, the predominantly glazed base of the building was now more animated and attractive and the elevated public garden would provide a natural respite from the busy city below. He further stated the level would give a unique experience of the notable architecture within the cluster and of St. Paul's and The Shard. Mr. Parry informed the Sub-Committee that the area of accessible public realm had been increased by up to 40% and he stated he was confident that these were all improvements and would further enhance the strong and compelling civic quality that was woven throughout the design which defined and set it apart as the cluster's totemic centrepiece.

Mr. Astrop addressed the Sub-Committee and thanked the policymakers of the City of London for an ambitious commitment to biodiversity. He stated he believed that the project was the beginning of a global paradigm shift and thanked Sub-Committee Members for their feedback. Mr. Astrop stated that the Sub-Committee had previously commented on the number of public benches which had been increased from 268 to 350 where the public could now take lunch breaks. He added that the public could now also take their lunch on the elevated public garden of 2,500sqm with 51 trees and biodiverse planting which was critical in helping to deliver more than 500% biodiversity net gain. Mr. Astrop also told the Sub-Committee that the garden also offered benches inside a free, and enclosed, garden room which ensured it would be pleasant to use all year round. He also noted that the Sub-Committee had commented on the ground floor, which had led to an optimised entrance for bicycles and a place had been designed for a place full of plants that would strive in those specific conditions. Mr. Astrop also stated that the Sub-Committee had commented on St. Helen's Square which would now have a step-free surface with access for all and a pavement that aligned and merged with adjacent public space. The space would also provide 17 mature native trees instead of 12 and the York stone would remain.

The Chairman invited Members to ask questions of the applicants.

A Member noted they had previously asked a question about the height of balustrades around the public area as they understood they were 2.5m tall and were made of glass, but sought clarity as the report referred to balconies that would incorporate balustrades of 1.5m high. The Member also queried whether a metal balustrade of 1.5m would be included with a 2.5m high glass balustrade. A supporter confirmed that 2.5m was the determined height as proposed and stated it was important there was a rail behind the balustrade to absolutely deter.

The Member also stated she understood that the scheme had come forward as the developer had previously said the trellis scheme floor plates were not

sufficient which was why the redesign had occurred and queried whether it was correct that the developer had now been able to incorporate a design by allowing the garden space with sufficient floor plates and whether it was larger than the previously agreed scheme. A supporter stated that was correct and the previous planning permission had been technically implemented since the last meeting the development was discussed at. The supporter further explained that the planning permission would have lapsed so a commercial decision was made to implement the consent rather than lose it and the CIL payment had been made. The supporter stated that the decision to apply the previously granted planning permission demonstrated a commitment to the site and believed that the application was the future for the site.

Another Member asked a question on who held responsibility for the running costs of the Museum of London classroom and queried how many classrooms in the sky were needed given one had been consented the week before and what analysis had been done on the number of children who needed to use the classrooms. A supporter stated they had been in discussion with the Museum of London for a significant amount of time and the intention was that the spaces would be self-sustaining. The supported added that the Museum was used to running spaces by allowing private hire to fund the spaces and the landlord would provide and fitout the space, so the operational costs were relatively small, and the same servicing would be used to get into the building. The supporter further added that there would be a mode which would be a blend of the money generated on site, any grants which were available and any contributions from London authorities which is where it was aimed to give every child in London the opportunity to visit it and any sponsorship that could be received. The supporter also stated that the landlord was fully supportive of the Museum to keep in operating. In regard to the question on how many children would use the classrooms, the supporter stated 3 or 4 classrooms had been proposed and that was based on being able to turn through all children at some point in their education, both at the secondary and primary level.

Clarity was sought by a Member on whether the expectation was that all children in London would visit one of the classrooms in the sky at some point. The supporter stated that it was the ambition and every one of London's children should have the opportunity to visit the classrooms. The Member queried whether detailed work had been carried out on the scale of children that would visit the classrooms. The supporter stated that it had been looked and now there was a seven-year journey to work out how it would be implemented. Another supported stated that the desire to learn about London through the London Museum was compelling for schools and the ambition was to enable every young person in their learning life to pass through the classroom in the sky. The supporter added that the unparalleled quality of experience delivered by the London Museum was hugely valued by schools as it was embedded in the London curriculum and hoped that would give Members assurance that the quality and mechanism to attract young people and schools to the classroom was strong.

A Member asked the develop to recommit that the public spaces would be public spaces once the building had been completed. The supporter stated that

the public ground space had been designed precisely to be publicly accessible and separate from the office space and told the Sub-Committee that if there was an element of potential privatisation in the future, it would have to return to the Sub-Committee for agreement as it had been set out in planning conditions and legal agreements and felt that was highly unlikely.

The Member also sought some clarity on St. Helen's Square being a place for nature as they understood how flora could be introduced through planting, but was unsure how fauna would be introduced. A supporter stated there would be a lot of native species of flora that would adapt to the local climate and attract birds.

The Member also sought to understand whether the height of the building at 310m was necessary as the Shard was 309.6m and felt the description of the building as 'totemic' was disappointing and considered whether it could have been a more modest height. The supporter told the Sub-Committee that it was at the centre of the cluster and felt it was an opportunity to build to the highest height. They added that they felt it was entirely appropriate in order to maximise the site.

A Member sought information on how many classes would go through the classroom in the sky in the course of a day, whether the area was solely for the use of the Museum of London and what would be done with the space at the end of the day when children had gone home. A supporter explained it would be mixed-use like the museum in Smithfield and there would be events for both adults and children and aimed for 300 pupils to come through the classroom every day. The supporter also explained that the amount of time classes could visit was constrained to the middle of the day and adults would visit outside of classroom hours. The supporter added that, to be sustainable, the museum needed to generate income, such as the provision of refreshments and shops, but stated it was absolutely about the public benefit and the museum was committed to that. The supporter told the Sub-Committee they would work through the details with the landlord and felt very assured that a compelling educational offer that benefitted the public would be created.

A question was raised by a Member on whether the Museum of London based at the development would recourse to funding from the City of London. The supporter confirmed it would not. The Member further queried whether the museum could be adequately funded through sales and the renting out of the space. The supporter stated that the fitout was supported by the landlord and, in terms of operational costs, the main building would be supported by the landlords which meant the museum would not have those costs. The supporter added that the staffing costs would be borne though the sustainable model developed with the proposed project.

The Chairman opened the floor to questions to the Officers.

The Chairman noted the refreshed National Planning Policy Framework (NPPF) issued by central government and asked Officers to clarify what aspects needed to be considered for the application and future applications. Officers

stated an addendum was circulated the day before which set out the changes to the NPPF and how it would impact on schemes before the Sub-Committee. Officers added that the changes did not significantly alter the assessment of the applications against the NPPF or the weight given to it and they did not have significant implications for the issues set out in the main reports for either scheme. Officers highlighted the main changes that had been made; a presumption in favour of sustainable development had been strengthened in some situations where policies were out of date, a new requirement had been added to recognise and address specific locational requirements of different sectors, the introduction of a vision-led approach to sustainable transport, greater emphasis in relation to developing brownfield sites and specific reference to the government's goal of meeting net zero by 2050, and for climate impact, urban heat and island flooding to be taken into account as relevant. Officers added that the addendum did set out where the issues had been covered in the main reports for each application and updated the references to the NPPF. Officers stated that in their view, the City Corporation's policies and practices were already ahead of the curve on those issues and added that Members would be aware that the starting point for determining applications remained the development plan and the NPPF which set out government policy, and was a material consideration to be taken into account alongside other material considerations.

A Member sought clarity on the mention of a Section 278 agreement with regard to the pedestrianisation of St. Mary Axe and a small section of Leadenhall Street. Officers told the Sub-Committee that the Section 278 area would include part of Leadenhall Street and the City Operations team were currently consulting on proposals for pavement widening and public realm improvements along the length of Leadenhall Street. Officers added that the scope for the works under the proposed application would be determined under a Section 278 agreement.

The Member also asked whether there was any opportunity for improvement at ground level at 122 Leadenhall Street. Officers informed the Sub-Committee that there had been scoping of enhancements to the ground floors and ideas were being developed. However, none of those ideas had been shared with Officers to date.

A question was also posed in regard to the corner of Undershaft and St. Mary Axe by the Member as they understood it would be a vehicle access, but there did not seem to be any inclusion of greening on the corner and asked whether there was scope to consider something. Officers stated there were practical constraints, but a valid point had been raised with the greening and they indicated this was something that could be explored through landscaping conditions recommended in the schedule.

A question was raised by a Member in relation to the amount of office space proposed in the development and whether it was the same as proposed in July and the office space had just been moved around. Officers

A Member asked, in relation to the amount of office space proposed in the development, whether it was the same as proposed in July, as objections were related to the effect on neighbouring light and the public realm, and further queried why it was not part of discussion about amendments if office space had just been moved around and not reduced. Officers stated that the changes to the floor space between the July 2024 application and the revised scheme as set out in paragraph 32 of the report did not that there was a small reduction in office space. Officers added it was a reduction from 154,156sqm in the July 2024 application to the application before the Sub-Committee which was 153,602sqm. Officers further stated it was partly due to some of the relocation of the public and amenity spaces which resulted in slight changes to the office across the podium floors, but Officers did not consider that it had significantly reduced it and it was still a significant quantum of office space proposed.

The Member further queried on the massing and whether things had been moved around as there had been mention of increasing the area of St. Helen's Square. The Member also asked whether the space would be added on somewhere else onto the building in terms of massing as it was difficult to follow what had happened in in terms of the lower levels of the building. Officers stated that from ground level to level 3, the building had been pushed back by 10m and some of that massing from the south had been moved around to the west side of the building and all the changes to those floor spaces, the movement of the uses and the implications were set out in the report.

A Member asked, in relation to the unsympathetic servicing ramp that had been mentioned, what Officers could the Sub-Committee was in the previously consented scheme in 2021 compared to the scheme that did not progress in the summer of July 2024. Officers stated it was largely the same as the proposed scheme, the road moved northwards and it would have built over the ramp. Another Officer stated that the previous scheme in 2021 had vehicle lifts on Undershaft as well.

Clarity was sought by a Member who stated that the tables seemed to have the figures for the whole life, carbon options table in metres squared, but not the figures for the total amount and questioned why that had been removed as it was a key figure in terms of the actual carbon impact in terms of the emissions. Officers stated that the table had been extended to show the absolute carbon emissions and the addendum showed that option 4 had a whole life carbon assessment (WCLA) impact of 310,847,000kg of CO_2 compared to option 1, the minor refurbishment option, of 158,094,000kg of CO_2.

The Member asked, if we looked at the major refurbishment against the option proposed, whether there was a differential rate in absolute carbon emissions between the July 2024 application and the proposed application and queried whether the 406,000 tonnes of CO_2 figure had removed the decarbonisation assumptions or whether it assumed the decarbonisation of the grid. Officers stated that the minor refurbishment had half of all the absolute carbon emissions of the new-build scheme, and the lowest carbon option was option 2, the major refurbishment option, that could reduce emissions significantly through the use of heat pumps and would be a quarter of the carbon emissions

of the proposed scheme. Officers added that the whole life cycle of carbon emissions were now calculated to be 390,481 tonnes of CO_2 and that was without decarbonisation as the GLA required. Officers further noted that once the grid decarbonised, it would reduce significantly. Officers added that operational carbon emissions had reduced from 746kg per square metre to 664kg per square metre which was due to the applicant further developing their model of the building from the July 2024 scheme and the total carbon emissions had been reduced from 2,247kg to 2165kg per square metre.

A Member sought assurance over the use of the classroom in the sky and balustrades as to whether they had been clarified in a condition that was watertight as a developer had previously misinterpreted a condition. Officers stated that the classroom in the sky would be secured through an obligation in the Section 106 agreement, not through condition, and they looked to seek agreement of the terms that had been discussed at the meeting through the Section 106 agreement. Officers added, in reference to suicide prevention, that there was a condition on the balustrades and would be condition 55 on approval. Officers further added that they would be drilling into the detail of the Supplementary Planning Document (SPD) and the requirements that were needed. Officers also told the Sub-Committee there was a condition on the balustrade of the doubling-up of requirements to ensure suicide prevention.

The Chairman moved to a debate of the Sub-Committee on the application.

The Chairman thanked the applicant, Officers, neighbours to the scheme, and ward Members and stated that the deferral of the decision in July was not a common action for the Sub-Committee to take. The Chairman added that the Sub-Committee did it on specific grounds around minor alterations to the ground floor and all parties had come together cooperatively in the last few months to deliver what was before the Sub-Committee.

A Member stated they were concerned with the design of the development, and it was an issue the heritage lobby had picked up as well. The Member added they commended the work put in, but felt the building at the lower level had a clear and detrimental effect on the quality of the public spaces around it. The Member further stated there was an increase in carbon footprint compared to what currently existed and there was a direct loss of a large section of the existing space that had a clear sky and no longer would. The Member further added that the heavy dominance of the building at the lower levels and it had a vast oversailing podium. The Member told the Sub-Committee that that it was compromising too and they had expected a reconsideration of not just what happened at a higher level of the building, which had improved, but the ground floor too. The Member added it had compromised the public realm far too much and he stated he could not support a building that was trying to do too much. The Member stated that it was a balance between optimisation and the public realm, and the public realm had to be valued. The Member concluded that the proposal was overselling the garden, and it was the wrong approach and he could not support it.

Another Member stated that not much had changed in terms of the actual figures with regard to the loss of the public realm which was a very rare large space of public realm at the ground level in the City and tiny pocket parks had been put forward as a public benefit. The Member added that the Officers worked incredibly hard to create pocket parks which had some genuine scale and further stated that the reduction in square metres from 4,669 to 3,850sqm was half the size of Manchester Cathedral at 704sqm which was a significant amount of loss. The Member told the Sub-Committee that it was losing when it had very little and endorsed what had been said by the previous Member.

A Member told the Sub-Committee they were not present for the initial consideration of the application but had opportunity to compare the two schemes and felt it was worth reflecting on the changing shape and size of the public realm that had been provided. The Member stated there was a reduction but, compared to the previous scheme, was less so and felt hat should be commended as a sign of being listened to. The Member added that it appeared to them that the classrooms in the sky would probably be cross subsidised by the footprint of the larger business model at the Museum of London which sounded entirely feasible and reasonable and it was the kind of thing that should be supported. The Member further stated that while another Member had described the new garden area as bolted on, he felt that it showed a willingness to compromise and adapt which was something he felt the Sub-Committee should encourage. The Member concluded that while there was some harm to the public realm and heritage views, he felt the economic benefit, the benefit from sustainability and the adaptability and compromise that had been made had drawn him to support the application.

It was stated by another Member that it was interesting to hear other Members use the word ‘compromise’ in regard to St. Helen’s Square and added that the point had been well made about the building trying to do too much. The Member commended the developers and designers for their work, but the ambition to achieve the height proposed, and the idea it was of significant strategic value, was nonsense. The Member further stated that the real strategic value was those buildings being close to a public transport hub. The Member added that their real concern was the natural environment, and the reality was there were a lot of failing green spaces around the City due to nature having to do things it could not do and stated that the idea that the space would flourish, be it for flora or fauna, was misleading. The Member concluded that if a public space was being created which was healthy and good for human beings, that needed to be carefully thought about.

Another Member stated they thought it was great that the development would be the tallest building and added it would be a great advert for the City, and to aim for anything less would be disappointing.

A Member stated that moving the space from the shadowed area in the west to the south which was sunnier was smart and a good move. The Member added, in terms of the building itself, it was not boring which was important and having a podium at 42m allowed the public an opportunity to view the iconic buildings around it as the architects had envisaged it. The Member noted that it was a

smart height to look at other buildings at rather than from above and felt the podium would be a great success. The Member concluded that the other advantage was the dedicated lift which meant the public could be at the podium in five minutes, have lunch, and come down again and indicated his strong support for the building.

Another Member told the Sub-Committee they disagreed on the benefit of having the highest public viewing platform, which was situated behind the previous highest viewing platforms. The Member also stated that the degradation of the public realm at street level was very concerning. The Member added that the ground level entrance looked like a cave and stated she did not think that an overshadowed square was going to be an attractive place to sit no matter how many benches were installed in it. The Member concluded that they would not be supporting the application.

A Member stated it was an unusual proposal and indicated she doubted whether or not the application would return to the Sub-Committee in time. The Member told the Sub-Committee she felt that if the applicant had a bit more time, they would have been able to revise and refine it to improve it. The Member added they had concerns about the loss of the ground floor space and whilst one could get a lift up and have lunch quickly, in practical terms it would be impossible as seen with other gardens in the sky where there had been long queues of visitors whilst those who lived or worked in the City would struggle to get up there in their lunchtime. The Member further stated that it was seen during Covid how crucial the open space was for those who had stayed in London and the City, and as people had come out of Covid, they had realised how important the natural environment was. The Member further added it was a shame that something would be lost which could not afford to be lost because the space was not available to be given away. The Member stated she was sure the architect could be creative and keep the open space while designing a building that was viable for the clients and would have preferred the developers to take a little more time rather than rush it through as they thought it could be refined a little bit more.

The Chairman stated the Sub-Committee had looked into the application in depth and acknowledged there were subjective differences of opinion on the architectural merits. The Chairman told the Sub-Committee that it was his feeling that the Sub-Committee should be bold and allow architects to be bold in their vision of what was delivered in the City. The Chairman added that it was important that there were features that were attractive and drew visitors above the ground floor. He stated that the winter garden that had been proposed offered a unique perspective in the heart of the cluster of tall buildings in the Square Mile. In reference to the ground floor, the Chairman added that a lot of work had been done on creating Undershaft Square and it as a vital element of the eastern cluster as there were not that many open spaces and was proud to see another 10m given over to the public realm. He further stated that as one came into the square, their eye was drawn to the London Museum and the public access into the building. The Chairman told the Sub-Committee that Officers had been working hard to ensure the building did feel open and accessible to all and, for those reasons, supported the application.

The Chairman moved the meeting to a vote.

The Town Clerk confirmed that Members were voting on Item 3 and the recommendations on Page 12 of the main agenda pack, with any relevant amendments set out in the addenda.

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

Votes were cast as follows: IN FAVOUR – 16
OPPOSED – 7
There were no abstentions.

The recommendations were therefore carried.

RESOLVED – That, Members approved the following recommendations:

(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 application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);

(b) 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;

(2) 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.

(3) 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.

(4) That members note that land affected by the building which is currently public highway and land over which the public have a right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may procced with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order under the delegated arrangements approved by the Court of Common Council.

(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.

4. **BURY HOUSE 1 - 4, 31 - 34 BURY STREET, LONDON, EC3A 5AR & 5. HOLLAND HOUSE 1 - 4, 32 BURY STREET, LONDON, EC3A 5AW - LISTED BUILDING CONSENT**

The Chairman stated that Agenda Items 4 and 5 would be taken together.

The Sub-Committee considered a report of the Chief Planning Officer and Development Director regarding Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR specifically the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. The Sub-Committee also considered a report of the Chief Planning Officer and Development Director regarding Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW, specifically the restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

The Officer stated that the presentation was a brief summary of a more comprehensive presentation which had been published. She added that two addenda had also been published to address additional representations and matters relevant to the new National Planning Policy Framework (NPPF).

The Officer stated that the application related to a site located to the northeast corner of Bury Street, northwest of Creechurch Lane. It comprised three buildings, namely Holland House, a grade two star listed building, Renown House and Bury House. It was within the recently designated Creechurch Conservation Area. Other designated heritage assets were located near the site, including the Bevis Mark Synagogue, a grade one listed building.

Members were informed that the site was located at the heart of the Eastern Cluster which contained the greatest density of businesses and jobs in the City.

It was also within the city cluster key area of change and the city cluster Tall Buildings Area as identified in the emerging City Plan 2040. In terms of the context of the area the site sat within a number of existing, consented and implemented tall buildings, including the Gherkin, 100 Leadenhall, 1 Undershaft, 24 Bevis Marks and 1 Creechurch.

The Sub-Committee was informed that Bury House was a seven-storey commercial building built in 1967. Members were shown existing floor plans and elevations of the building. Renown House was a five-storey office building, built in 1912. Although not a heritage asset, Renown House was a characterful survival of a small-scale office building. Members were shown the existing floor plans and elevations of the building. The Officer stated that Holland House was a grade two star listed building which was built to designs of Berlage in 1916. It was of expressionist style with vertical architectural form finished in distinctive grey green faience. Members were shown the floor plans and elevations of Holland House.

The Sub-Committee was advised that planning permission was sought for an office led development involving the demolition of Bury House and erection of a new building comprising four basement levels, ground plus 43-storey restoration works, Holland House and Renown House including extensions, interconnection of the three buildings and construction of a single core within Bury House to serve all three buildings.

The Officer advised that listed building consent was also sought for the external restoration works to Holland House, the partial demolition and construction of the four-storey roof extension, together with the internal alterations including truncation of the existing light well.

Members were informed that the proposed development had been designed to activate the ground floor and optimise inclusive public realm. The Renown House ground floor plate would be lowered to provide step-free access to both Renown House and Holland House. Step-free access would also be provided throughout James Court, Heneage Arcade and Bury Street. Access to the cycle parking would be off Creechurch Lane and Heneage Arcade. There would be one servicing point of Heneage Lane to serve the whole development with consolidated deliveries not exceeding 33 vehicles a day and a blue badge parking bay was also proposed within the designated servicing bay to serve the proposed development. 582 long stay and 85 short stay policy compliant cycle parking spaces were proposed within the lower ground and basement levels along with dedicated cycle repair space supporting the provision of new skills in the area providing training and jobs for young adults. Policy compliant end of trip facilities would be provided at basement level two.

The Officer highlighted the existing and proposed public realm arrangements. Despite the relatively small site footprint, the proposed building would provide over 600 square metres of new external public realm providing over 75% uplift. Members were shown a ground floor axonometric plan showing the ground floor arrangement and its proposed uses. Heneage Arcade would create a new thoroughfare, reintroducing a historic City route with flexible retail cafe uses and

incorporating public art. St James Court would be reimagined, providing a space available to the wider community that was accessible, inclusive and inviting.

Members were shown the proposed lower ground, ground and first floor plans. Alongside the office space, flexible, educational, cultural, community, sports, multi-faith spaces would be introduced which would be combined to create a compelling and inclusive public offer in the heart of the cluster, in line with the Destination City agenda. The proposal would also provide over 1,100 square metres of affordable workspace.

Members were shown the a section of the proposed Heneage Arcade at ground floor and the double-storey flexible auditorium to the upper floors. These multi-functional bookable spaces would attract a wide range of activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. The spaces would be available free of charge for community-based groups, non-profit organisations and schools for over 67 hours each week, along with the artwork proposed to be displayed along Heneage Arcade. The proposal would also involve the creation of an outer climbing wall on the facade of the tower fronting St James Court. This would be open to the public, encouraging health and well-being and supporting the provision of new sports and recreation facilities.

Members were shown the indicative floor plans of the proposed development, showing the variation of the floor plates, the introduction of roof terraces, the recessed extensions to the listed building, the tapering of the upper floors of the tower element, the proposed office floor space floor plates which ranged between 350 square metres and 580 square metres for businesses of 50 to 60 people, supporting smaller start-up businesses providing office tenants with their own private entrance and a gated floor space. An urban farm was proposed at the ninth floor of Holland House to be used as a rooftop classroom, providing a nurturing environment for learners to explore plus urban greening. Office tenants would also benefit from access to terraces which would provide a space of calm and engagement with nature.

The Officer stated that planning permission for the demolition of the building at 31 Bury Street and the construction of a 48-storey tower building was previously refused. The reasons for refusal included the adverse impact the development had on the setting and amenities of the grade one listed Bevis Mark Synagogue by reason of the overbearing and overshadowing impact of the development on the courtyard, and the adverse impact of the development on the Tower of London World Heritage Site by reason of the less than substantial harm caused to the LVMF 10A.1 from the Tower Bridge North Bastion.

Members were informed that the current proposal incorporated three buildings rather than Bury House alone. In terms of the tower element, this had been amended to reduce its height by 19 metres and by setting back the top eight

floors to reduce the massing towards the termination point of the tower.

Members were shown the existing and proposed elevations, showing the development within its context. In the southwest elevation the proposed development would be approximately 16 metres lower than the Gherkin. In the northeast elevation, the development would be approximately 84 metres lower than 100 Leadenhall. Members were also shown the northwest and southeast elevations, a closer view of the proposed development at Renown House and Holland House and the relationship with the proposed tower element. They were also informed by the Officer that the development would involve the demolition of the existing clumsy 1960s, 70s and 80s and 80s extensions and their replacement with three additional floors that were set back from the main facade providing a well-considered designed response. She commented that the overall design of the extensions to Renown House would maintain the existing qualities and its relationship with Holland House executed in a different style to continue to be read as two separate buildings. As could be seen from the historic and proposed illustrative view, the additional storeys would have a very limited visibility in the oblique views.

The Officer stated that the building was designed to have no negative impact on the ability to appreciate the historic facades. The proposed element would be a sophisticated new addition to the city cluster through the use of high-quality faience materials and detailing inspired by the immediate neighbours. The proposed building would be an appropriate and sympathetic neighbour in architectural terms.

Members were shown images of some of the different scenarios that had been tested for environmental impacts, including the baseline scenario, the future baseline and the cumulative including the proposed development. They were also shown a table outlining the daylight and sunlight impacts of the proposed development of the nearby receptors. These impacts had been independently reviewed and were assessed in detail in the report. Moderate daylight impacts on some nearby residential properties have been identified. These were considered acceptable considering the context of the City. Negligible effects have been identified in terms of sunlight.

The Officer showed the view of the proposed development from Bevis Marks Synagogue's courtyard with the reduction in height and massing from the previously refused application. Members were shown an image of the interior of the synagogue towards the Bimah and an image from the gallery. Photographs showed the synagogue had large sized windows to all four elevations. The daylight impacts of the proposed development in the synagogue showed an absolute reduction of 0.4% in the gallery and central room between the cumulative and future baseline scenarios, which was considered a minor adverse impact. Members were shown a slide outlining the sunlight impacts into the synagogue. It was noted that these meet the BRE criteria. Members were also shown a visual of the interior of the synagogue. The exhibition centre could be seen and it was to the south of the synagogue.

The application was supported by a qualitative assessment called a radiance

assessment, which showed the level of daylight in a room. 3D visuals were presented which showed the impact on the level of daylight would be localised and in a limited area in the gallery and it would be minimally noticeable. A comparison of the daylight and sunlight impacts from the previous scheme has been carried out by a third party on behalf of the Corporation. The results show that the daylight effects remained relatively comparable, and the sunlight effects of the proposed scheme represented a small improvement when compared to the refused scheme. Members were reminded that the daylight and sunlight impact into the interior of the synagogue was not a reason for refusal of the previous application.

Members were shown a visual of the layout of the synagogue's courtyard as it was in 1925, with a previous annex and as existing following the recent changes to include an exhibition centre with a new ramp and a permanent security and ticketing booths. In terms of overshadowing, the courtyard of Bevis Marks Synagogue would meet the BRE guidelines. Although not a BRE requirement, when considering the average sunlight availability in the courtyard the changes between the future baseline and cumulative were very limited and equated to a maximum of 19 minutes' reduction of sunlight in June. This reduction was not considered to preclude from continuing to use the space for religious events or in association with the visitor centre.

In terms of wind and thermal comfort, several scenarios had been tested and it had been found there would be no safety exceedances. Members were shown the existing wind condition scenario and were informed that with the proposed development built on site, conditions were suitable for their intended use. Landscaping mitigations were only required at the level seven terrace of the proposed development and with all cumulative schemes included, the wind conditions would still be suitable for their intended use and the conditions in the synagogue courtyard would remain suitable for frequent seating.

Members were informed of the importance of viewing the moon to enable the reciting of the Kiddush Levana prayer and stated this topic was subject to a number of objections. To respond to these objections, the applicant had carried out a study of a full lunar cycle. The assessment was based on the visibility of the moon from two observer points within the courtyard which were outlined. The results of the study were that in the existing conditions the moon was not visible at all for three months in the year and this was reduced by one more month in the future baseline scenario and this was due to the technically implemented 100 Leadenhall building. Although the proposed development would reduce the number of hours that the development would be visible from the observer points, it would not reduce the number of months that the moon would be visible when compared to the future baseline scenario. Members were informed that the City of London Corporation had taken positive steps to advance equality of opportunity by undertaking a detailed assessment of the impacts of the proposal on the use of the synagogue, and it was considered that the impacts of the development would not adversely affect the synagogue as a place of worship in order to warrant a ground for refusal.

Members were shown a number of townscape views. In the existing view from Tower Bridge South, with the proposed development and cumulative schemes, the proposed development would clearly form part of the cluster that was read as a distinctive entity from the World Heritage Site. From 10A.1, less than substantial harm was previously identified to the Tower of London by the previously refused development. As could be seen in the proposed and cumulative views the currently proposed development would appear at the east edge of the cluster, providing an eastern endpiece playing an important role in mediating between the cluster and the lower buildings to the east, particularly when compared to 100 Leadenhall and 1 Undershaft. In the view from Queen's Walk, in the existing, proposed and with cumulative schemes it was considered the observer would continue to recognise and appreciate the World Heritage Site as a strategically important landmark set apart from the City.

Members were shown the existing, proposed and cumulative views from the Tower of London Inner ward and the east of Devereux Tower and the local views from Bury Street. It was considered the proposed extensions to Holland House and Renown House would be architecturally designed to be recessive to the architecture of the Grade II* listed façade.

In the view from Bevis Mark Synagogue with the proposed development and with implemented schemes, the synagogue had commanding presence in the courtyard as the forefront of the view. There were existing tall buildings visible behind the synagogue, including 40 and 100 Leadenhall. It was from the courtyard entrance that they were the most visible. When moving into the courtyard closer to the synagogue, they quickly receded into glimpsed background elements. In the view from Creechurch looking northwest with the proposed development and cumulative schemes, the development could be seen as part of a dynamic, denser urban townscape fundamentally characterised by its proximity to other tall buildings.

Members were informed that Carbon Optioneering had been carried out to establish carbon impacts, opportunities and constraints for the environmental sustainability to inform the development proposals and this was independently reviewed. The energy strategy had been optimised for the site and a BREEAM excellent rating was targeted. Circular economy measures had been incorporated, such as retaining approximately 35% of the existing structures, as well as designing for longevity, adaptability and low maintenance. The development would also achieve a UGF of 0.32 which exceeded the policy requirements.

The Officer stated that when comparing the scheme to that previously refused, it was considered the amendments incorporated to the tower element to reduce its height and massing, would be sufficient to overcome the previous reason for refusal in terms of the impact on to the World Heritage Site.

To conclude, the Officer stated that the proposed development would secure a strategic office-led development within the City cluster that would provide land uses which would support the diversification, vitality and growth of the cluster as a 24/7 world class business destination. The provision of over 34,500 square

metres of Grade A office floor space and over 2,400 jobs would significantly contribute to the City of London's economic base. The provision of over 1,100 of affordable workspace free of charge for charities would provide an inclusive offer and attract small businesses. The flexible retail, educational, cultural community, sports, multi faith spaces would create a compelling and inclusive public offer in the cluster in line with the Destination City agenda. The development would result in a significant aesthetic enhancement to the Creechurch locality, and it would optimise the public realm offer. The proposed faience-clad tower would provide a sophisticated form of architecture and new architectural counterpoint to its glazed predecessors. The environmental impacts of the development had been extensively assessed in detail in the report and were considered acceptable by Officers. Officers recommended approval of the application subject to conditions and subject to the execution of planning obligations as set out in the agenda pack.

At this point, at 12.22pm, the Chairman adjourned the meeting for 15 minutes. The meeting resumed at 12.37pm.

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.

The Chairman then invited the objectors to speak.

Sir Michael Bear requested that as Rachel Blake MP was unable to attend the meeting as she was in Parliament, that Tilla Crowne as trustee be allowed to speak in her stead.

Sir Michael stated that it was unprecedented for a pro-growth, former Lord Mayor of the City of London to address Members as an objector but this particular application left him no choice. He stated that the City of London was an exceptional place from Roman times to mediaeval times to modernity. Interesting and fine buildings had made the city the unique and highly attractive place that it was. These traditions had created the world's leading financial centre. In 1985, rules were changed, allowing much denser and taller buildings, but this had always been counterbalanced by designating conservation areas, and these preserved the best of the past and had produced a vibrant mix of styles. He questioned how 31 Bury Street fitted into the exemplary planning decisions made by Officers and Members in the past, whether it respected the conservation area it was in and was designated less than a year ago and whether it respected listed buildings and views of the two principal heritage assets of St Paul's Cathedral and the Tower of London as well as the Bevis Mark Synagogue grade one listed building and Holland House grade two listed building. He stated that whilst he did not consider that it damaged St Paul's Cathedral, it did damage all of the other three buildings.

Sir Michael stated that Holland House was an exceptional grade two star listed building of the First World War era with a very unusual facade. He stated that the developer planned for extra floors and Historic England had stated they would not grant listed building consent.

Sir Michael stated that Bevis Mark Synagogue had been continuously occupied since its construction in 1701, it was older than St Paul's and built by the same school of constructors as the Wren churches. It was a unique piece of architecture, a living centre of an important minority community and something to be celebrated in the multicultural City. It was the only non-Christian place of worship in the Square Mile. It had religious rules such as not turning on electricity on the Sabbath, requiring views of the moon and having enough natural light to read the books of the law. Some of its traditions were unique in the world. Members were informed the technical issues about 31 Bury Street were clear. Firstly, there was no significant change in the design apart from a small reduction in height so the grounds of refusal of the first application still stood. Secondly, the current application was in direct conflict with the current City Plan where policy CS14 stated that the Corporation would refuse planning permission for tall buildings in conservation areas. He added that the City had rightly been granting consent for new buildings to deal with the demand for new modern space but as a developer, he knew the market very well, and the development world was in turmoil with no finance available for 13 of the 14 consented towers.

Sir Michael expressed concern that it was claimed that the proposals would preserve the setting and significance of the synagogue and that there would be an enhancement to the Creechurch Conservation Area and stated that the benefits were disingenuous. He stated the majority would apply to office buildings anywhere in the City and others were standard requirements. He queried who the community space was intended to serve and whether it would amount to anything with so many recent applications including similar provisions, and with these uses peppered around the City with no apparent demand or location strategy.

Sir Michael added that to degrade one established community space for a new one elsewhere was not reasonable and that the Officer recommendation completely disregarded the City traditions mentioned as well as the importance of multiculturalism and religious tolerance. He further added that he spoke as somebody who cared deeply about the City's heritage and traditions, and he urged Members to refuse this application as they did the previous one.

Ms Henrietta Gordon informed the Sub-Committee that she had worked as a solicitor in the City of London for over 25 years, she was not Jewish and had no links to Bevis Marks, its community or the wider Jewish community. In addition, no one had asked her to object, she had done so because she believed this was not just a planning application but she believed the Jewish people, their faith and their place of worship could continue to be discriminated against and the law could continue to be broken within the City of London. She stated that this was demonstrated by the ways in which St Paul's Cathedral and the Bevis Mark Synagogue were being treated. She commented that St Paul’s Cathedral opened in 1710 and was afforded a wealth of legal protection by the City of London Corporation and the Mayor of London.
No buildings whether offices or otherwise, encroached upon it. It was justifiably treated with reverence. Bevis Mark Synagogue, by contrast, had little or no

protection and was about to lose its last remaining daylight if this building project went ahead. Ms Gordon stated that the synagogue opened in 1701. It was the oldest synagogue in the UK in continuous use, and it was the only synagogue building in Europe that had held continuous services for more than 320 years. It was the main synagogue built after the readmission of Jews to England by Oliver Cromwell following the expulsion in 1290 and the synagogue continued to be an active place of worship. It was also the only non-Christian place of worship within the City of London.

Ms Gordon stated that St Paul's Cathedral and Bevis Mark Synagogue were both grade one buildings built within a few years of each other, in the early 18th century with almost identical historic and religious significance and yet Bevis Marks was not being offered the same protection that was given to St Paul's Cathedral. She stated that situation would be significantly aggregated if this application was allowed. She commented that the City of London Corporation was subject to the planning and the public sector equality duty in Section 149 of the Equality Act 2010. The principles in the decision of Brown v the Secretary of State for Work and Pensions, had become defining guidelines for the exercise of this duty. The Human Rights Act Articles 9 and 14 also required Christian and Jewish worshippers to be treated in the same way and their places of worship should not, therefore, be treated differently. Furthermore, the Corporation adopted the international definition of antisemitism in full on 5 December 2019. This included antisemitism directed towards Jewish individuals and all their property towards Jewish institutions and religious facilities. Ms Gordon commented that allowing this proposed building to remove the last natural light to Bevis Marks would in her view be a breach of the Corporation's equality duty, a breach of the human rights of the members of the synagogue and an act of discrimination and antisemitism.

Ms Gordon commented that there were approximately 250,000 Jewish people in the UK. They were therefore considered a minority group and, as such, were worthy of protection. She considered that if the application were approved, this would be acting contrary to this. She added that she was objecting because she was concerned at the possible perception of the Jewish faith being treated as worthy of less protection than her own faith and because as a lawyer of over 25 years, she was anxious at the prospect of the law being broken in relation to a Jewish place of worship of equivalent historic and religious significance to a Christian place of worship. Having worked within the City of London for her entire career, she was uncomfortable at the prospect of such discrimination taking place on her doorstep by an establishment that, she strongly felt, should be leading by example. She asked the Sub-Committee to avoid any such discrimination by refusing the planning application and thereby affording Bevis Marks Synagogue the same protection as St Paul's Cathedral.

Adrian Phillips, Director of Historical Palaces, the custodians of the Tower of London World Heritage Site stated they strongly objected to the Bury House application. He stated they firmly believed that the heightened massing of the proposed 43-storey building at the very eastern edge of the cluster would harm the setting of the Tower of London. Mr Phillips commented that it was one of the best examples of castle ever built anywhere in the world. Its landmark siting

and visual dominance on the river edge and the impressive skyline were key to its designation as a World Heritage Site. The setting of such a castle designated to project royal power over its surroundings, was crucial to its significance but the proposed development would fill the clear sky space beside the White Tower when seen from the strategically protected view of Tower Bridge and would erode the setting and value of the World Heritage Site.

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

A Member asked how the Kiddush Levana prayer was recited when the waxing moon was invisible on a series of cloudy nights and also if following the start of the prayer, it suddenly became cloudy whether the service would be completed. The objector stated that the prayer was said upon seeing the night sky. If that moon was obstructed, then the prayer could not be recited. The reduction in the amount of viewing hours was from 100 to 40 hours and functionally would reduce the number of months that this prayer could be said depending on the year, from four to six months. If someone had been there at the beginning and said the opening of the prayer and then a cloud passed by, they could continue, but this proposal would essentially create a perpetual cloudy sky and would diminish the ability to worship there.

A Member asked Mr Phillips from the Tower of London for more information on his concerns. He stated that whilst the principle of a cluster was supported, it was getting higher and encroaching on the tower. The views of the tower were so sacrosanct to the understanding of its significance and appreciating it as something that reigned over the City for many years. It was a key asset for the City which welcomed over 3 million visitors a year and that really supported the City and the Destination City Programme. The Tower was therefore an important asset that should be embraced and welcomed and it was considered that this development was too close.

A Member queried the UNESCO and ICOMOS concerns on the encroachment to the World Heritage Site and were advised that a state of conservation report had been received by government along with a technical review of Bury Street.

A Member asked a representative of the synagogue why they considered the development to be a major threat to the synagogue e.g. the impact on lighting levels and the ability of the synagogue to function. She also asked if there were any other heritage harm. She added that the scheme had changed since it was previously submitted and asked whether policy changes had impacted either positively or negatively. A representative from the synagogue stated that the functional impact was that the synagogue was a living community. It was probably the only Jewish community in the world today that had maintained continuity back to 1700. This made it a place of profound international and deep significance to the Jewish community and this development would have a meaningful and significant impact on the community's ability to continue to use the space and to worship. The development would create a perpetual cloudy evening, and the internal light levels would ensure a perpetual winter morning. These were real, tangible impacts.

Currently, nearly all the light daylight present, particularly in the ground floor of the synagogue, was a product of light reflected off the surrounding surfaces of the buildings of the courtyard around it. This made this building very unusual as it put it beyond the normal boundaries of the day lighting of buildings. Members were shown an indicative image which showed the creation of a huge degree of shading during parts of the day and it was stated that the report submitted to the Sub-Committee gave an empirical example of this and there was a comparison between the effect of One Creechurch and that of the proposed development. It was suggested that as the current methodology used for understanding the impact of day lighting and its reduction did not take into account the reflective characteristics of the surrounding buildings, as a result, the proposed methodology used was deficient and a significant part of the submission was to try and demonstrate that. As a result, it was considered that the Sub-Committee had not been given the full picture of how much harm was being done to the day lighting of the synagogue. An objector stated this was an exceptional grade one listed building that was essentially like a cathedral building and the courtyard of the building was an extension of the synagogue and was intrinsic to its heritage significance. The synagogue did not have a vestibule but had a courtyard and therefore the building and its courtyard were both of exceptional interest. The prominence of the synagogue was also intrinsic to the significance, and as could be seen in the images shown, this prominence would not be preserved. The light into the synagogue was essential for the synagogue to function as such. If that was somehow prohibited or diminished, then the significance of the synagogue as a working building would be put into question and this would cause a high level of heritage harm together with architectural impacts.

A Member stated that the Officer had stated there would be a minor adverse loss of daylight, that in the gallery, the loss of or the impact on daylight would be minimally noticeable and that there would be no adverse effects that would prevent the synagogue from remaining as a place of worship. The Member asked the objectors reasons for not accepting these statements.

A Member queried an objector's suggestion that Bevis Marks synagogue was comparable to St Paul's which he considered to be a slight distortion of history as Cromwell permitted the synagogue to be built on the basis of it being a discrete private place and it had never been open to the public or visible in the same way as St Paul's so he did not consider it fair to compare the two buildings. He stated they were both important buildings with Bevis Marks possibly more so in some ways as it was the only one in the City whereas St Paul's was one of many churches. The objector stated that St Paul's was so well protected by the City of London, not because it was open to the public, but because it was a place of reverence and a place of historic interest. It was a grade one listed building built at the same time as the synagogue.

A Member queried Ms Gordon statement that the proposal would remove the last natural light from Bevis Marks which was contradicted by Officers. Ms Gordon stated the Officer report confirmed that the light study carried out by the applicant did not take into account reflected light. The objectors had demonstrated with their study that the overwhelming majority of the light in the

synagogue was derived from reflected light. Without a study that took that into account, the loss that would occur could not be measured. The objectors' study had measured the loss that has occurred from One Creechurch, which was the same distance away, where only 20 storeys had caused the light levels to plummet by overshadowing the synagogue. It was stated that it was highly likely that the same plummeting of light levels would occur during the hours of 31 Bury Street obscured the sunlight over the synagogue.

A Member having clarified that Ms Gordon practiced law asked her to confirm that she had stated that if the application was approved, the law would be broken and that the Sub-Committee would be acting contrary to certain people's human rights. She responded by stating that in her understanding the Sub-Committee would be in breach of their duties of Section 149 of the Equality Act 2010, Articles 9 and 10, 9 and 14 of the Human Rights Act and would not be committing to the international definition of antisemitism which the Corporation had subscribed to on 5 December 2009, which meant that the Jewish community, its institutions and religious facilities, were supposed to be protected. By allowing this building to go ahead she considered this would be damaging a Jewish place of worship. The Member then asked Sir Michael Bear who had worked with many of the Members present if he understood how offensive such comments could be to certain people present. Sir Michael Bear stated that people were speaking from the heart and it was worth hearing their comments. He stated he was not there to judge and the campaign embarked upon had been an elegant, sophisticated and respectful one. The Member commented that the City was hosting a Hannukah reception the following week. Sir Michael Bear stated it was ironic this was the festival of light. The Member stated that it been mentioned that the building under consideration was not financed and that this was not a material planning consideration. Sir Michael Bear conceded with the point.

A Member asked given the continuous freedom of worship at Bevis Marks for the last 300 years, what impact this would have on that continued freedom. An objector stated the synagogue was built by Jews who found refuge in this country escaping the Spanish Inquisition. The City of London had protected the community for nearly 400 years and it would be tragic if the planning decision harmed the ability to continue to worship in the place where it was first guaranteed in this country.
The development would make it more difficult to read the prayers, if it is more difficult for us to say particular prayers and the synagogue would become simply a heritage asset and would cease to be the longest continuously operating synagogue in the world. This should be a source of pride and be preserved and protected.

A Member asked an objector to clarify the difference between the image of the real world impact and the expected image in relation to One Creechurch. Using the images, the objector outlined the differences with One Creechurch, having a substantial effect on the interior lighting of the of the synagogue. In relation to the Bury Street proposal, there would be a period of time in which the courtyard walls would be similarly shadowed as they were by 1 Creechurch Street so whilst the effect could not yet be given in absolute terms, in indicative empirical

terms there was a similar depreciation of the daylight levels within the synagogue.

The Town Clerk invited the applicants to speak. Alexander Morris stated he was speaking on behalf of the applicant who had been investing in developing in London for over 20 years and was the largest non-listed London Office Fund with real estate in Westminster, the City and Islington. He stated the application provided substantial economic, environmental and social benefits. The economic benefits of the new office space would deliver the strategic objectives of the draft 2040 City Plan. Mr Morris stated the environmental benefits of the scheme were consistent or better than recent applications approved by the Sub-Committee and advised that he was joined by six people to illuminate the substantial social benefits in their own words, representing some of the 250 groups that had been engaged with across education, multi-faith charities, sports and culture.

Mr Alex Feldman, Deputy Headteacher at Dairy Meadow Primary School in Southall stated that this was a state school that served an area of high deprivation in the Borough of Ealing. The majority of the children were first or second generation immigrants from South Asia. They did not have English as a first language and had parents that majorly work in the black or gig economy. He added that his passion as an educator was for children to dream big and realise that their background class, creed, colour or religion should not be barriers to future success. Having Holland House as a tangible resource in the City of London over the last three years had crystallised this, from visiting and seeing the grave of the Roman girl at the entrance travelling through the age of Empire and into a boardroom modelled on the Titanic, Holland House truly made the history curriculum come alive. All of the children at the school knew what CEOs were, but Holland House gave them a chance to sit at the head of the head of a boardroom table. Mr Feldman advised that world of work days had been held, primary school children had met individuals involved who contributed to the construction and the running of Holland House and there had been CV writing workshops and mock interviews. School counsellors had visited to know more about the City of London and could tangibly see now how they could be the next cog in the engine of the mercantile centre of the UK. He added that even by getting on the Elizabeth line to travel up to Holland House, the students got the idea that they could engage with the buildings and could see themselves as future city workers. The hands-on immersive experiences provided the children with real world examples of their learning. There were plans to work with the urban farm to build on ideas of sustainability and teamwork within the STEM sector. This enrichment could never occur within the constraints of the school. Thanks to the visits to Holland House, Mr Feldman had witnessed the children develop their own sense of self identity, learnt from the rich history that surrounded them and the cultural grounding of Holland House. He was confident in saying that the students could now see themselves as decision makers and hopefully future leaders.

Harshita Patel, City resident, parent carer of a teenager with autism and an advocate for families facing special education needs and disabilities (SEND) stated that through her work with the City Parent Carer Forum and the SEN

Board, she had witnessed the unique challenges that families encountered. As an access and inclusion consultant in the public realm, she had collaborated with organisations and this year she had applied for the Barbican Imagine Fund. Together, over 100 individuals had been supported in accessing free creative arts and sports, thereby enhancing their health and well-being in the Square Mile which had limited public spaces and bureaucratic hurdles that often left families isolated. There was a significant lack of safe areas for regular activities and essential facilities. Ms Patel stated there was a need for community centres that were grassroot led, providing structure and fostering a sense of belonging. It was crucial for City planning to consider the needs of families with SEND and other marginalised groups. A great example of inclusive design was Holland House. It prioritised accessibility, featured changing places toilets, sensory areas and spaces tailored for various needs. It created a new standard for accessibility environments, breaking down barriers to participation. Ms Patel added that creating inclusive spaces could profoundly impact the community by promoting dignity and by encouraging involvement, a stronger, more supportive environment could be created for everyone.

Ms Shahida Victor, from Greenhouse Sports charity, stated the charity developed young people through sports and mentoring. She stated that being a Muslim from Fiji, where cultures met, versatile values were united in harmony and she was delighted to learn of Holland House which was a house of hope where different faiths were celebrated. Differences were embraced and welcomed and the space would serve as a platform to unite people in cohesion and build bridges. Ms Victor stated she was speaking as a representative of both community and faith groups, a voice that transcended and united as with up to 150 Muslim men and women joining Friday prayers sessions at Holland House every week. She added that Aslam Baccus, trustee of Halls For Jamar had stated the venue supported multi-faith groups and community based projects in a cultural and professional space supporting diverse initiatives that promoted inclusivity and learning. She further added that this support was shared by Dharf Patel of the City Hindus Network and Param Singh of the City of Sikhs Network who welcomed the proposals, emphasising how activities could be expanded to engage more effectively, sharing their delight at discovering this affordable venue in the City and the opportunities to foster connections and strengthen community ties at Holland House. St Helen's Church in Bishopsgate had welcomed additional space provided at Holland House with Mandarin Christian groups Sunday School, podcast recording sessions and other activities benefiting from its inclusivity and accessibility.

Mr Troy and Ms Kuku Richards, founders of the Museum of Diversity stated they were speaking not just as advocates for this application, but as individuals committed to creating spaces where every voice mattered and every story was celebrated. They asked Members to imagine a young person visiting the City of London for the first time and feeling like an outsider, then stepping into Holland House, a vibrant cultural hub where they saw themselves reflected in the exhibitions, stories and workshops and finding reassurance in a space that whispered ‘you belong here’. Slowly their confidence would grow as they began to envision a future where they too could contribute to the City's legacy. Holland House was more than a building. It integrated the Museum of Diversity into the

City of London's fabric, forming a cultural hub that improvised underrepresented narratives and fostered connections. This renovation was vital to transforming the City's identity from a place once defined by its walls to one celebrated for inclusivity and cultural vibrancy.

Mr Richards stated the impact of the Museum of Diversity being in Holland House had been significant from initiatives such as the virtual reality museum collaborations with local schools and universities, as well as the project for the Commonwealth Secretariat that has reached over 2 million people globally. Events hosted at Holland House included art showcases, music performances and educational forums which engaged the community and deepened impact. Mr Richards added that this renovation would provide the permanent space needed to expand programmes, grow the museum and position London as a global cultural leader. Economically, this project would draw new visitors, boost tourism and support local businesses while redefining public spaces as inclusive and dynamic. This application was not just about renovating the building, it was about investing in London's future by supporting this project to ensure that this historic space became a vibrant cultural hub where diverse voices were celebrated and every individual felt they had a place in the story of the City.

Tessa Sanderson, CBE stated she had competed in six consecutive Olympic Games from 1976 to 1996, winning gold in 1984. She informed Members that forty years ago, she achieved the dream of Olympic gold becoming the first and only British athlete to win gold in a throwing event but she did not do it alone. It was the belief and support of key individuals that made it possible. She was speaking as an ambassador for the Museum of Diversity because hope and an opportunity was given to her and she was committed to sharing stories like hers which inspired, empowered and reflected the resilience and richness of communities.

The Deputy Chairman sought an explanation for how the lunar transit study was carried out, how it was validated and whether it had received a third-party expert review. A supporter stated the study was carried out by Dr. Axel Jacobs who had a PhD in light and lighting and it was reviewed by Dr Ticleanu, the Head of Lighting at the BRE. The supporter added that the information that had been used to undertake the calculations was publicly available and had been entirely peer-reviewed from both a technical side and through the onsite measurements.

The Deputy Chairman cited the support of staff to users in the community space that was frequently mentioned in letters in support of the application and asked, if the scheme was consented, whether the support would be continued and, if so, could details be provided of that. A supporter stated a lot of time had been spent talking to organisations about the requirements and the demand was significant already. He added that the plan was to offer the service, space and opportunities in perpetuity of the life of the asset and there was a number of supporters in attendance that had been heard from. The supporter further stated he would happily talk about some of the others who had used the space and would use the space continuously.

A Member stated the number of voluntary and community-sector organisations that had been engaged was interesting and questioned how many children and families from the Aldgate School had been engaged in the programme. The supporter responded that the Aldgate School had not been engaged and they had not used the space, but they had gone to schools across London rather than just specifically local. The supporter stated they had spoken to Canon Barnett Primary School and they had used the space quite a bit.

The Member also asked whether the St. Botolph's Aldgate Centre had been engaged and St. Joseph's Centre for Dignified Work. The Member added that the new Aldgate Centre was hiring a space at nearly £1,000 a day to keep the lights on. The supporter stated that the documentation clearly described who the developer had been able to consult with and were not sure they had consulted with the two organisations referred to.

A Member asked the applicants to address the issues of reflective light and the assertion made by an objector that the availability of light would plummet. A supporter responded that the studies undertaken had considered reflective light and the point had been made that they may not have considered sunlit reflected light off the back of the Courtyard. The supporter added that the skies in the UK were mostly cloudy, so sunlight proportion was about a third of the day and of that the third, the tower would only block a small portion which had been tested using the BRE methodology. The supporter further stated that the impact was determined to the negligible and the total sum of it meant that there would be an effect, but overall then changes had been considered to be minor.

The Member queried further on the use of the word 'plummet' by an objector. The supporter told Members that there were changes occurring all the time, every day and at different hours depending on things such as external obstructions, the height of the sun in the sky, cloudiness, and haziness. The supporter suggested the word 'plummet' was used to determine what was a temporary effect and the fact that if the tower blocked the passage of the sun, the light could not reflect back into the synagogue and, for a period of time, the light levels would drop. The supporter added that the studies of daylight ran for an entire year and the resulting studies which determined the significance of an effect were judged on balance throughout the whole year and not on a specific instance in a day.

A Member sought an explanation to understand the context of the application, as it was rejected in 2021, and of the developer's relationship with the synagogue as she did not understand how, after all those years, the relationship seemed to be in the same place with the whole Jewish community not in support of the application, especially as the paper said there was an intention to continue engaging with the Bevis Marks Synagogue. A supporter explained that their relationship with the Synagogue started around four and a half years ago in the original application where the very first meeting, in advance of the meeting with City Officers, had been with representatives of the Synagogue. The supporter added that the relationship continued all the way up to the application being submitted, the application going through consultation,

until a month later a number of objections had been received. The supporter stated he felt that it showed during the first application that, even though the application was refused, he continued the dialogue. He further noted that he told the first person he spoke to from the synagogue, who was not part of the current team, that he wanted to create an opportunity where they could work together and there were a number of official and unofficial meetings. The supporter also stated he had met with a number of people in attendance and had got to a point where they tried to reach a neighbourly agreement, as the developer was on one side with the space and the neighbour to the developer past the Valiant House was the Synagogue. The supporter told the Sub-Committee that they had tried to get to a point of agreement between the developer and the Synagogue which he believed was discussed at a trustee meeting and it was not agreed to. He further added that since that point, he had tried to keep the dialogue open and it would be fair to say that he and the Synagogue had not spoken this year other than one meeting on 13 November where he spoke with representatives of the synagogue, with the subject relating to the moon, daylight and sunlight. The applicant told the Sub-Committee that he, without a doubt, had kept a connection with the Synagogue and a lot of their consultants and apologised for having not reached a point of agreement.

The Member also asked if there was anyone on the development team who was an expert, or consultant, who understood the Jewish faith. The supporter stated that they did not have anyone sitting in the team who was an expert of the Jewish faith and felt that all the material provided by Bevis Marks Synagogue and their team, including talks and YouTube videos, had been helpful for the applicant side, as well as Members and Officers, to understand concerns and work out how to apply empirical analysis and methodologies and understand the impact from an empirical and numerical sense. The supporter added it was for Officers and Members to appreciate Bevis Marks Synagogue's concerns and consider whether they were empirical data impacts and what impact it would have on the ability to worship.

The Member also queried a detailed explanation as to what the benefits were, weighted proportionately to the lighting with the Synagogue, as it seemed that some of the benefits could be done without a new development. The Member in response to clarification from supporters on the question stated they were referring to the benefits in relation to the Section 106 funding and within the application as the Sub-Committee had been told they were quite remarkable and, whilst a lot of the things were included were good, they were not necessarily out of the ordinary. The Member added they wanted an explanation as to why they were exceptional benefits.

A supporter explained, in terms of the public benefits package weighed against the heritage harm and overall harms of the scheme, and the uniqueness would be relevant to the weight attributed to the benefit and made reference to a previous application where a classroom in the sky was presented as a 'unique' offer when there were already other classrooms in the sky. The supporter stated, in that sense, that they would not say it was unique, but that there were unique features about the overall package of benefits. The supporter added that one of the unique features was the degree of testing of the public use in

advance which meant that the individual spaces within Holland House and Creechurch Hall that were proposed responded to the engagement that had happened. A supporter indicated that three-on-three basketball, a classroom and an immersive space gallery had fed into the overall broad package of public benefits that would be unique in one sense, but not a single unique benefit.

The Member questioned how long the fabric of the building would last and how long the benefits would be locked in for. The supporter explained that buildings were now designed to a minimum of 60 years and that was linked to the design whole life cycle carbon and the building had been designed to be a loose-fit if it needed to be upgraded. However, the supporter indicated that there was no intention of the building being designed to be demolished, although it had to be as part of due process and expected the building to be there in perpetuity.

A Member stated it was brilliant to hear the space was currently being used by a number of organisations, including the Halls for Jumuah and Museum of Diversity, and sought confirmation that if the application was refused, the organisations would be able to continue using the space. The supporter told the Sub-Committee that in regard to the economics of the building, it was fair to say that there was a point in time where they would have to think of something different if there was a refusal. The supporter added that they had agreed, in the short-term, to three months of use by a number of individuals, whether it was sports or the Museum of Diversity. The applicant stated they needed to manage an economic position and he would have an empty building, which had been kept empty for the case, and he had made that investment and decision to deliver. The supporter further added that what they had been able to do was have a vast list of individuals doing different things within the space, so it was a decision from an economics perspective.

The Member queried why none of the presentation was about the building and whether there was a reason none of the 10 minutes had been used to tackle some of the points made by the Objectors. The supporter explained the reason they only spoke about the social benefits was because he felt the Officer's report had said everything and set out all the key parts of the economic and sustainability aspects. The supporter noted he was quite happy to answer any questions on other parts of the application.

Another Member told the Sub-Committee that everyone had to accept that the community of Bevis Marks believed that the building would severely damage their ability, if not completely stop, to worship in the Synagogue. The Member added that was the Synagogue's view of it and felt everyone needed to accept that. The Member added that it was difficult for them to understand how it could be suggested that the benefits that were applied to other people could, in some way, offset the damage done to another community as it should not be a competition between groups of who gets the benefit. The Member further stated that they found it unseemly that the supporter was trying to use the benefits to justify the damage that the Jewish community believed was going to be done. The supporter stated it was difficult to answer as to whether they accepted the damage that was referred to by an Objector and they had listened to the

Objectors, considered and talked to try to understand. The supporter indicated that they were not religious and could not walk into the Synagogue and respond to what an objector had said, but they could say that they had been through, with their team, a way to find a path of understanding to use empirical and technical information to try to understand what the concern was. The applicant told the Sub-Committee they believed they had done everything they could and had got a point where there was no harm.

The Member questioned why the benefits were predicated on a building whose design would damage the light into the synagogue and why a building could not be designed that did not cause the damage but still contained the benefits. The supporter explained it was related to the economics and partly to do with the opportunity to use Holland House as a community space as there was a certain element of work that needed to be done to connect Holland House, Renown House and Bury House and Bury House was, at present, effectively acting as the host. The supporter added that host provided an upgrade from a DDA and fire perspective, as well as a sustainability answer to the heritage and the tower itself would deliver not only the offices, but was delivering a response to the listed building issue. The supporter told the Sub-Committee that it was necessary to have the two working together and the reason for the height and shape of the building was related to the second reason of the previous application.

A Member noted they were on the Sub-Committee when the developer last brought a scheme for approval and recalled the scheme was refused mainly due to the adverse impact on the Grade One setting of St. Bevis Mark's Synagogue, its overbearing and overshadowing impact of the development on the courtyard of the Synagogue which was contrary to the protection of the setting of listed buildings, and the adverse effect on the setting of the Tower of London world heritage site. The Member stated that they could see the applicant had amended the scheme to try to limit the impact on the World Heritage Site, they struggled to see how the scheme had been amended to overcome the grounds that it was initially refused on in relation to the overbearing and overshadowing impact. The Member added those grounds for refusal were not completely captured in the refusal note and there were other grounds raised such as Holland House as they had raised the impact on the Grade Two-listed Holland House themselves. A supporter confirmed the Member was correct, stated there were a very clear two reasons for refusal and told the Sub-Committee that led to a response to change the massing and tried to reduce harm to both assets in key views and increase the public benefits. Another supporter stated that in relation to the perception of the overbearing impact from the courtyard of the synagogue and the effects of the setting on the Synagogue, the building had been reduced in height quite visibly, with the massing on top also reduced, so when one entered the courtyard, as seen in the presentation, one would see most of the building but as one moved around the courtyard, less of it would be seen. The supporter added that in all cases, the Synagogue would be very close and present in the foreground and, in order to see the building from many spots in the courtyard, one would need to crank their neck, and a video had been provided to prove that. It was further stated by the supporter that tall buildings were already visible, and it was part of the

character of the Synagogue. In relation to the Tower of London, the supporter explained that there was clearly a reduction in height and that the proposal would maintain the gap that already existed in the view from the northern bastion of Tower Bridge between Heron Plaza and the White Tower.

The Member outlined that they realised Holland House needed to have some work done around the façade and queried why that had not been done to protect the historic building as they would have thought it would be one of the developer's priorities to preserve the current historic building of Holland House and ensure it was repaired and safe. A supporter stated they had spent quite a bit of time and money going through the structural elements and the safety of the façade, which continued to be monitored, and had carried out what was required for that particular façade.

The Member also raised the issue of the community space and noted a few months ago that the Sub-Committee granted the whole of Writers House as part of a community space for the Clare House development and there was another development at Bishopsgate near Liverpool Street Station that included two floors of community flexible space. The Member further noted the Sub-Committee had granted a classroom in the sky in the previous application and asked why the developer felt that their community offering was needed in addition to what had already been granted, why it was different and why it was a benefit. The Member stated that there was plenty of space in the City of London for community groups, who were always welcome and, if the development did not go ahead, space could be found for those already using the space. The Member asked the developer to outline the benefits as a lot of these would be encapsulated in any development there that could be designed to not overshadow or overbear on the Grade One-listed St. Bevis Marks Synagogue. A supporter stated that, in terms of benefits, the uniqueness of what they had done was the testing by thousands of users who had used the space and had said that was where the demand was. The supporter added that they understood the point made and that there were already consents for more space, but felt that demand outstripped supply now and would do so in the future. The supporter told the Sub-Committee that another point relating to the overall uniqueness of the scheme was that the offer was in perpetuity as other similar offers were usually aimed at a specific tenant which then fell away and required a new tenant to be found.

The Chairman moved the discussion to Members questions to Officers.

The Chairman sought to clarify some of the emotive points against the factual points and stated a need to get clear bandwidth between the two to ensure decisions were made in line with planning policy.

The Chairman noted there was reference to the fact that Historic England would not grant consent for Holland House off the back of what had been proposed and sought some clarification of the situation from Officers and where the conservation was going as it was a very clear statement they would not grant it. Officers responded that Historic England could not grant Listed Building Consent themselves as they were not a decision-making body. However, as set

out in the report, they did have the power of direction over listed buildings, including the ability to direct refusal of certain building consents, direct the imposition of conditions on consents or allow the Local Authority to determine as it saw fit. Officers added that in this case, they had objected to the scheme and have no issued their direction which, until such a direction had been received, meant that a Listed Building Consent decision could not be issued. Officers confirmed that Historic England were awaiting the Sub-Committee's decision before they decided what to do.

The Chairman also sought an answer on a point made by objectors regarding an assertion of the Sub-Committee being antisemitic, breaching human rights or being discriminatory as they were matters of law and not matters of opinion. He asked Officers for clarification that the Sub-Committee was on solid ground to make its decisions and that the reports that had been provided were not falling into the aforementioned categories. Officers responded that they could give absolute assurance that they were satisfied there had been a thorough assessment on the equality impact of the development and granting permission would not breach the public sector equality duty and the report before the Sub-Committee contained a thorough assessment of the complex equality impact of the application at an unprecedented level and the approach to equality impact was also reviewed by a third party, which was also unique and unprecedented, and was subject to internal and external legal scrutiny. Officers accepted it was a difficult situation for everyone in the room, but the suggestions that the Officers' conclusions were discriminatory or antisemitic were offensive with regard to their integrity. Officers underlined that they operated with professionalism, were objective and acted with integrity and impartiality. He added, above all, they were sensitive and respectful to all communities.

The Chairman asked Officers to inform the Sub-Committee on their confidence, or lack thereof, in the daylight and sunlight reports. Officers explained they had based their assessment on the data that was presented by the applicant which was based on the standards of the industry under BRE guidance, and the assessment had been third party reviewed. Officers told Members that they had considered the previous impact of the previously proposed development in comparison to the current development and that comparison had also been reviewed as well following the submission of the Bevis Marks Synagogue's daylight study which had also been third party reviewed. Officers stated they were confident that the conclusions in the report regarding impact on daylight and sunlight had been robustly assessed.

The Deputy Chairman queried whether the provision of the Hub and the auditorium space with suitable support staff for users would be conditioned and could not be withdrawn if the application was granted and implemented. Officers confirmed there was a condition securing the provision of them and would also secure the provision of them in perpetuity of the development via a Section 106 obligations. Officers added that they had included an implementation strategy for the cultural, education, sports and community spaces via Section 106 obligations, as well as a management plan for those uses to secure Creechurch Hall and Holland House Hub.

The Deputy Chairman also noted that the proposed tower was very close to the Synagogue and asked whether the City had any other consented or implemented towers in the City that were comparably near to sensitive buildings and locations. Officers explained the proposal was in the City Cluster area where ancient and hyper modern office buildings were seen in close juxtaposition such as St. Ethelburga's and 100 Bishopsgate, St. Andrew Undershaft and the Undershaft proposals that were discussed earlier in the meeting, and 22 Bishopsgate and St. Helen' Church. Officers added they were the kind of juxtapositions that most acutely embodied the City's living traditions as a modern financial centre with ancient roots and were part of its DNA. Officers further stated that if one took that as the starting point, then it followed that dynamic change, such as that of the proposal, was not necessarily harmful in principle or against the grain of the place. Officers further noted that they negotiated schemes to achieve respectful and appropriate relationships with heritage assets in the Cluster and the proposals were an example of this in its relationships with the various heritage assets in the locality. Officers maintained that the proposals were entirely in keeping with the character of the Cluster.

The Deputy Chairman also asked Officers to confirm their satisfaction with the lunar study and the BRE validation of it. Officers responded that their assessment had been based on data that was provided by the applicant and, after third party review by BRE, had accepted as stated in the report that there would be a reduction in terms of hours that the moon would be visible. However, as said during the presentation, the number of months that the moon would be visible would not be reduced when compared to the future baseline which reduced the number of months that the moon was visible by one month, but this was due to 100 Leadenhall. Officers directed Members to Page 1005 and stated that was where the tables set out the number of hours, number of days, and number of months that the moon would be visible.

The Deputy Chairman also questioned whether World Heritage was a material consideration that the Sub-Committee needed to consider. Officers confirmed that the World Heritage Site was a material consideration, and the City had a duty to preserve it.

A Member informed the Sub-Committee they too were offended by references to the Equality Act, and particularly antisemitism as, while they were not Jewish, they were a great supporter of Israel. However, this was a planning application, and they stated they were trying to limit their reasoning to planning considerations. The Member asked whether the named Acts were valid reasons to take into account when making the planning decision. Officers indicated they understood the question to be whether the Equalities Act and the Human Rights Act were material considerations in respect of the Sub-Committee's decisions and confirmed that they were. Officers noted that the report set out a thorough assessment of how the public sector equality duty applied and what they believed the impact would be. Officers also added that the report also went through what was considered to be the human rights balance and the implications for that.

The Member also queried if there was provision for public toilets that were accessible and not just those using the building as they had gone through the papers and could not find reference to it. Officers indicated they had considered the provision of changing place facilities and public toilets and confirmed they had imposed Condition 55 on Page 1112 that required the submission of details for a Changing Place, wheelchair accessibility, ambulant accessible toilet, baby changing facilities at the ground floor and associated signs to ensure that people could be directed to those facilities. Officers added they had also secured, through planning obligation, the management of the facilities.

Another Member noted that a year ago, the Sub-Committee voted unanimously to create the Creechurch Conservation Area and questioned why it would be ignored a year later in its first test. Officers explained that it had been fully assessed in the Officer report and summarised from the report that many of the viewing experiences in the Conservation Area did have the towers of the Cluster as its backdrop and, in many of the views, the proposed tall building would be seen above the low-rise Conservation Area buildings as part of the existing high-rise backdrop more associated with the Cluster above than the Creechurch Conservation Area below. Officers added that from the views where the Tower would be seen coming to ground, such as Mitre Street and Creechurch Lane, it would appear as a contrast in scale with the Conservation Area buildings. However, in the Creechurch Conservation Area proposal approved by the Planning and Transportation Committee, one of the identified attributes of the Conservation Area Special Interest was the juxtaposition in scale between buildings. Officers further stated in this sense, the proposal would not be a departure from the qualities identified in the formal designation of the conservation area.

The Member also stated that they understood that the heritage statutory consultees believed that some harm would be caused to the Synagogue and the Tower of London and questioned what the point of the consultation was in the first place if the Sub-Committee was not going to listen to heritage consultees. Officers responded, in relation to a previous point made about the character of the City Cluster, that if one took the established dynamic as the starting point, it followed that the proposal was not necessarily harmful in principle or against the grain of the place and, with that in mind, Officers sometimes arrive at different conclusions to Historic England and other bodies who seemed to begin from a different position. Officers added it was worth noting that there were many instances where Officers accorded with the views of objectors and the planning system allowed for a plurality of approaches.

A Member noted that the report had stated that there would not be any material impact to carry out religious practices, including circumcision, but then on Paragraph 430 went on to state that Officers did not profess expertise in the areas of religious history and practices. The Member stated that the Rabbi and one of the objections had said there would be an impact on circumcision and questioned what experts Officers had consulted with from the Jewish community as there were two different answers being received. The Member also asked for an explanation for the methodology and raised an example that if an organisation had people who were partially blind, would they be taken into

consideration or was it a generic methodology that was applied to the lighting. Officers stated they were not religious experts, but had assessed the daylight levels from the data provided by the applicant, which had also been third party reviewed, and the impacts identified within the interior of the Synagogue were minor adverse and, therefore, were not considered to be significant. Officers, for that reason, still considered that the Synagogue would be able to operate as a place of worship and carry out all religious ceremonies. Officers added, in regard to the daylight assessment, that the industry standards were to submit information around daylight and sunlight guidance based on the BRE guidance and that was what the applicant had submitted. Officers also noted that the applicant had prepared a radiance assessment which showed the light levels within the interior of a room, they were standard practice, accepted by local authorities and that is what Officers had assessed. Officers further stated they had the assessments third-party assessed by BRE and they had accepted and agreed with the impacts identified in those assessments. Officers further added that the impact on the interior, in relation to daylight and sunlight, of the Synagogue was not a reason for refusal last time and the previous refusal was related to the overshadowing and overbearing impact on the courtyard.

Another Member stated equality impact was the focus of what was being looked at and it was a concern that, during the course of the Sub-Committee meeting, it was having to seek to understand whether or not we had to apply the equality impact to the decision-making. The Member told the Sub-Committee the public sector equality duty absolutely had to be considered, and it was in the papers. The Member noted that the papers were the longest and most difficult to follow they had ever experienced and requested a drawing to attention of the key points that Members needed to take into consideration in relation to equality impact. The Member added that they understood it to be that it was not necessarily about having an impact, but the impact being disproportionate and stated the least the Sub-Committee could do was take the application as seriously as it could. The Member drew attention to Page 441 where the public sector equality duty was referenced and felt it would assist the Sub-Committee if that was at the forefront of its mind. Officers stated they would read out Section 149 as there was a danger that if they tried to summarise what had been identified as the main equality impacts, that would leave something out and could bring things into question. Officers added that there was an equalities impact assessment itself and Members were required to take that into account, but a lot of comments had also come through consultation as well and that, and what had been heard at the meeting, all formed part of the equalities information that was in front of Members which they would need to take a view on. Officers read out the following in Section 149 of the Equality Act 2010: the City as a Public Authority must, in the exercise of its function, have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that was prohibited under the Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Officers read out Section 149.3 of the Equality Act: that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not

share it involves having due regard, in particular, to the need to remove and minimise disadvantages suffered by persons who shared a relevant protected characteristic that are not connected to that characteristic; to take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; to encourage persons who share a relevant characteristic to participate in public life or in any other activity in which participation by such persons was disproportionately low. Officers added they also set out what the protected characteristics, which were: age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Officers further stated that public authorities also needed to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. Another Officer added that it did not just stop there as there was a thread throughout the entire report that looked at every single impact through those lenses and would not accept that the report was incoherent or unstructured and felt it was one of the best reports that had ever been drafted by the City.

The Member clarified that they did not mean they were referring to the quality of the report itself, but was referring to the way it had been received and stated they would be very surprised if other Members did not feel that receiving bits and pieces of the report had made it slightly more difficult to read and appreciated that may not have been an issue for Officers but felt it was important for the Sub-Committee to have that drawn to its attention. Officers stated that they read the Member's comments to suggest they had underplayed equalities obligations in the report. The Member confirmed that was not the case and stated there were different views at to where the balance was, but it had been difficult to get everything in one place and to understand everything in a way that would be helpful. The Member suggested it would be helpful to have a SharePoint site where all the papers could be viewed.

The Member sought confirmation that the full redevelopment option, which been had been selected, rather than the refurbishment option produced three times the whole life carbon emissions. Officers explained there were four options in the optioneering study and the redevelopment option had 56m tonnes of carbon emissions while the simple refurbishment option was only 15m tonnes, so it was more than three times as much. They added that Options Two and Three, which were also refurbishment with some extensions, were slightly higher in carbon, but were less than the redevelopment option and that was set out in the carbon option table in the report.

The Member asked, in relation to the refused scheme, whether the fact of refusal and the reasons given were a material consideration for the Sub-Committee. Officers confirmed that the reasons for refusal were a material planning consideration.

The Member also queried, in relation to the comparing of the refused scheme and current scheme from the applicant's presentation, that the difference between the two was described as absolutely minimal and were virtually identical in relation to the level of light. Officers clarified that the daylight levels

were relatively comparable and, in relation to sunlight effects, the proposed scheme represented a small improvement in comparison to the refused scheme.

The Chairman moved the meeting to a debate.

A Member indicated they wanted to discuss the balance of public and commercial benefits of the applications by referring to a previous scheme for the Synagogue in 2020. The Member stated that the earlier scheme, which was almost completed, involved demolishing and then rebuilding a single level annex building against the south wall of the Synagogue. The Member added that the project could have been stopped at the demolition stage, which would've added space to the courtyard, and that was how Members saw the site when they visited a few years ago prior to the last application where the old annex had gone and there was a concrete pad in the courtyard. The Member stated further that had the application been stopped at that point, it would have restored the Synagogue to what it was in 1925. However, that was not what happened. The Member told the Sub-Committee that a new annex was built with the same proportions to the previous one with the addition of an access ramp and a ticket office, and it would become a visitor centre with a café, shop, meeting rooms and exhibition spaces. The Member added that the disbenefits of the scheme, which was almost complete, had a reduction of natural light in the Synagogue because the ground floor windows on the south side continued to be internal windows, not external windows as they were in 1925 and there was a loss of a possibility of having a courtyard that was 30% larger. The Member indicated that had that scheme come to the Committee, he would have supported it as they felt the benefits of St. Bevis Mark's having a visitor centre would have outweighed the negatives, but Members did not get an opportunity to consider the application because there were no objections at all and it was decided by Officers under the Scheme of Delegations and he believed the Officers were right that time. The Member concluded that the same reasons for weighing up the loss of light and decrease in size of the courtyard, even thought the courtyard was not changing on this occasion, were the same issue on this occasion and expressed his support for the Officers.

Another Member addressed the Sub-Committee and stated the application before it was materially the same as the previous one the Sub-Committee had rejected citing the harm it would cause and, three years later, there was a stronger case to reject the application as the establishment of a Conservation Area, with the policy recommending refusal of tall buildings within inappropriate areas, including Conservation Areas, and if a tall building was to be granted, it should enhance the Conservation Area. The Member added that, as heard from the report, the harm would be caused and not enhance, and the scheme would result in heritage harm to the buildings, as well as to an existing community with deep connections to the location dating back hundreds of years. The Member stated that the benefits from the applications were temporary in comparison and were hardly unique, special or proportionate to justify the harm and it was not necessary to do this to unlock the benefits. The Member further added that the Officer's report acknowledged that they did not have an expertise in the area of religious history and practice, and yet Members were told the

application would not impact on the religious practices when Members were hearing from the Jewish community unequivocally that it would impact their freedom to worship. The Member further stated that it was hardly a development that was promoting inclusivity and accessibility, and indicated she would vote against the application and urged other Members of the Sub-Committee to do so as the application, like the previous scheme, would cause significant harm which could not be outweighed by any benefit of the development as it would cause irreversible damage to religious worship which had taken place on the site for hundreds of years. The Member concluded the application was materially the same as the one previously rejected by the Sub-Committee, particularly in relation to the harm caused, and it was essential that the Sub-Committee remain consistent in its opposition as a result and she would vote against the application.

A Member stated they were in favour of development, were sometimes in favour of taller buildings if they were right and every time the Sub-Committee made a decision of this nature, it was on balance. The Member indicated they would vote against the application as it crossed too much red lines, particularly relating to the Local Plan and heritage considerations.

The Deputy Chairman addressed the Sub-Committee and stated it was a difficult application to decide on as there was clearly harm to the Synagogue which would be caused to the development if consented and it had attracted a large volume of persuasive and passionate objections. He stated that the Synagogue was a wonderful asset in the City and all wanted to it to continue to flourish and thrive in the future, but there were a large number of significant benefits that the application, if consented, would bring such as the 34,000sqm of Grade A office space and CIL payments of around £10m, affordable housing contributions and the enhancements to the Grade Two-listed Holland House which the Deputy Chairman indicated were very positive. However, he stated it was the multifunctional auditorium space and the Holland House hub together, which would provide 1,400sqm of free to use space for the majority of the week, which was the unique office offer and the variety of groups that had successfully been using the community space was impressive, including museums, religious groups, art organisations, educational establishments and the London Fire Brigade. The Deputy Chairman further added that the community offering was exceptional and was clearly highly valued by those who had used it and, on balance, believed that the benefits of the application did outweigh the harm. The Deputy Chairman stated he would support the Officer recommendations.

A Member indicated they wanted to come back on some points made by a Member earlier in the debate in regard to the visitor centre next to the Synagogue and noted when they visited the Synagogue, they could clearly see that the visitor centre was a single level building with a glass roof, so the light was getting into the visitor centre and was not obscuring the windows at all. The Member told the Sub-Committee she could see that the developer had tried to improve the public benefit as the public benefit did not outweigh the detrimental harm done to the Synagogue and the World Heritage Site last time. The Member added that, whilst she believed the applicant had done their best,

they believed the harm may have been impounded by the proposal to increase the floors on Holland House which was a Grade II-listed unique building and the only building to have been constructed during the First World War which for her was another negative impact on a listed building. The Member further stated that the Tower of London as a World Heritage Site really was unique and was why it had that status, so while the height might have dropped down slightly, it was still very clear in those visuals of the impact toward White Tower and deflected from the site of White Tower across towards the Cluster and felt that was a very negative impact on the World Heritage Site. The Member, in reference to the Bevis Marks Synagogue, told the Sub-Committee that they had asked to see the light slide of the previous scheme that had been refused versus the proposed scheme and noted that Officers had confirmed in the meeting that there was no difference in the lighting between the refused scheme and the proposed scheme. The Member added that, having visited the Synagogue again, it was a very unique location, and it would be really overshadowed and impacted in her view. The Member further stated that the Synagogue was unique to the City of London and the country and believed that it deserved protection, as the City's policies stated, and felt that she would approve a scheme that was designed to minimise the impacts on the Synagogue and the World Heritage Site. The Member added that there were other spaces in the City of London which were granted a number of community spaces and the City was not lacking in those, and not to the point where the Sub-Committee would agree a scheme that would irreversibly damage the Synagogue and the World Heritage Site. The Member concluded that she would not approve the scheme.

Another Member addressed the Sub-Committee and stated their first point was in relation to the impact that Historic England had highlighted and noted they had previously supported applications that filled in the Cluster, including the application that had come before the Sub-Committee earlier in the meeting. The Member stated, however, that if one looked at View 23, one could see that the development popped up, not as a shoulder of the Cluster, but as if another Cluster was being started and was a very substantial addition and did not read as part of the existing Cluster. The Member added, secondly, that when one turned to View 45a, and referred to a comment made earlier in reference to need to crack your neck to view the building, that was not the case, it could be seen as soon as one walked into the courtyard and the dominant thing in that courtyard would be the building. The Member told the Sub-Committee he could not see how it possibly protected or enhanced the Conservation Area and did not see how it possibly helped the setting of a Grade I-listed building. The Member, referring to the new NPPF framework, highlighted paragraph 212 that stated: 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. The Member stated that was the new instruction and did not see how the Sub-Committee could possibly approve the application with that instruction. The Member also raised the issue of sunlight and overshadowing, which referred to Page 203 of the presentation pack which had the indoor daylight luminance

study shown, and indicated he could not figure out which of the numbers were supposed to be used as it seemed to be two numbers for the balcony, but whichever numbers were used, there was a 30% reduction in an already lower level and, in particular, the balcony was where women worshipped and would have a particular impact on them. The Member concluded, with reference to the lunar studies, that they did not understand the concept of counting the months and the fact was that people had to go out and worship on a monthly basis if they could, and to tell them they had a 15-minute window to possibly do it on a particular day was not telling them that they could do it. The Member suggested it was trying to explain Judaism to Jewish people which did not strike him as a helpful thing for anyone to be trying to do. The Member concluded that, for the aforementioned reasons, they would reject the application.

A Member addressed the Sub-Committee and stated he had been present for the original rejection and remained fairly convinced by the Officers, and had been reassured by them, that the development would not adversely affect the Synagogue as a place of worship. The Member added that they had been reassured by the Officers that it did meet the primary requirements for daylight and not adversely affecting daylight, and the applicants had made significant changes to the tower, specifically the shape and scale of it, in such a way that met the objections from both the Tower of London and from inside the Synagogue. The Member noted on the other hand that the Rabbi and the Jewish community were all saying it would adversely affect, or to some extent, render worship unworkable in the Synagogue and reduce it to being no more than a tourist attraction. The Member further added that there were two very strong arguments on both sides and could see it was going to be very challenging for the Sub-Committee to reach a fair and equitable decision. The Member concluded that it would have to be voted on and he intended to vote in favour of the application.

Another Member addressed the Sub-Committee and referred to a previous point made by a Member that the Officers said it would not affect worship in the Synagogue. The Member stated that Officers had confirmed, in response to another question, that they were no experts and the congregation obviously disagreed with that assessment. The Member added that if the Sub-Committee valued The Hub which seemed to be doing lovely work, there was no reason why it could not look for it in any other development and the Sub-Committee could demand it of the developer if they came back to Sub-Committee on a different site. The Member told the Sub-Committee that, as a previous Member had stated, all the heritage groups were against the proposal and the previous, and current, Members of Parliament was against the proposal. The Member further added that the proximity, the overshadowing and the overbearing nature of the development did affect the setting of the Synagogue which was important to the congregation. The Member further stated they did not believe that was acceptable and concluded they could not support the application.

A Member stated that they felt all of the Members felt that it was a difficult position for the Sub-Committee to be in and no one liked to have to make such decisions, but Members were elected to do so and it was interesting that planning applications came down to the passage of the sun and, indeed, in this

case the passage of the moon. The Member added that there was the added complexity of a heritage asset near the site, as well as the complexity of religion in the mix too and, to a certain extent, Officers had been put in an extremely invidious position of having to somehow make tangible the intangible which was at the heart of the challenge that Members had. The Member told the Sub-Committee that there was a developer who wanted to build a large building and had brought the scale of that back from a rejected application and the Sub-Committee were being told that the economics of that were required in order to continue what appeared to be a really worthwhile and valuable community space. The Member further added, as an aside, that they felt slightly uncomfortable at feeling like the Sub-Committee was being pitted between two different sets of communities within the City during the early presentations, but that was to be put to one side. The Member stated that on one hand were friends in the Jewish community whose voices the Sub-Committee was listening to who had heard what had been said, and echoed another Member's comments that it was unfortunate that the timing of the meeting was today on Shabbat. The Member further added that, having read through the pack and listened to the comments, they wanted to address a previous point by another Member as, when Members said the Officers had to be an expert in absolutely everything, including religion, he did not believe that was necessarily true and felt what was important was that Officers used the metrics and benchmarks that were available to them. The Member told the Sub-Committee that they had heard, with regard to the lunar transit, that Officers had done that and they could not be asked to be experts on the divine and did not think that would be reasonable as it was a part of town that needed a revamp and where development was needed and the economic benefit did need to be yielded that the site would bring. The Member concluded that, in recognition of the public benefit and trading that off against what they thought was indeed concern from a very valuable minority community here in the City who it desperately wanted to protect and look after, in their view they would support the application as he felt that the Officers had made a very difficult, but correct decision.

Another Member stated they believed that the Sub-Committee was working on the basis that it was an application being treated on its merits and not as a show of loyalty to anyone in particular. The Member added that the use of benchmarks was important, and it was important to say where the limit of those benchmarks was and they felt the Sub-Committee was in unique territory with the application. The Member stated it was right to say that last time, planning Officers had recommended and the Sub-Committee refused the application and did so on grounds that had not changed in substance. The Member noted that the reason she had asked about the material planning consideration of the previous refusal was to ensure that everyone could understand there was a consistency in approach of the Sub-Committee and that certainty was important, whether one was more pro-growth than their approaches to the expansion of office space or not, for everyone. The Member added she was asking the question about the point of whether it had fundamentally changed in terms of light or harm to the Tower of London World Heritage Site, and, in her view, there was unjustified harm to the Tower of London World Heritage Site at a very sensitive time which was entirely in keeping with what had been said before. The Member further stated that if one looked at images 23 and 45a, it

was really instructive and showed one that it was highly visible and did draw the eye, and it was important to acknowledge that there was a real harm to the Synagogue which everyone agreed there would at least be some adverse effect to the Synagogue's light impact, particularly in the ladies gallery and in the courtyard. The Member further added that it diminished the quality of the space and the chipping away at the access to light and sunlight for the important and valuable Grade I-listed building did not justify the continue chipping away and was an example of why the stringent St. Paul's requirements on sightlines, that sometimes felt heavy-handed, were the only way to prevent it from taking place. The Member told the Sub-Committee that, on balance, there had not been a significant change in those aspects and hoped a broader conservation could be had with Officers about how the City used really valuable opportunities, in relation to meanwhile space, to infill them into spaces that have been used as a public benefit on a number of other applications as if those spaces were not suitable for some groups, then the City would have a broader issue. The Member confirmed they would not approve the application and would be refusing.

The Chairman indicated the Sub-Committee need to give credence to the fact that it had a responsibility to vote without fear or favour as had been pointed out at the last meeting and stated it was not to give any favouritism to any party to an application as the Sub-Committee had to make sure it was making decisions as independent Members. He told the Sub-Committee that an application had been looked at in the morning where an applicant had listened to their neighbours and come back with an improved scheme and he looked at the proposed scheme with the reduced massing, the reduced height and felt the applicant had listened, listened to their neighbours, engaged with the groups involved in the scheme and had come back with quite a different scheme. He stated there were some comparators around the tower, but when one considered the impact on Holland House and Renown House, it was a very different bulk altogether that had come forward for consideration. The Chairman added that the Sub-Committee had to remember that it may have subjective views on the impacts on the World Heritage Site, the heights and impacts on daylight and sunlight, but the scheme did fit within the Eastern Cluster and the tall buildings area that had been designated by Members, had been approved by the Planning and Transportation Committee and the Court of Common Council, and was now with the Planning Inspectorate. The Chairman further stated that the tall building fit within the tall building cluster and, objectively, fit within City policies which the Sub-Committee should bear in mind when it looked at the impact on the World Heritage Site. He further added, in relation to the community offering, that was interesting that competition was spoken about in reference to the Synagogue and the communities that had been heard from and felt there was not a competition and there was nothing stopping the Synagogue from carrying out its religious activities. The Chairman told the Sub-Committee that if he felt there was a real impact on the Synagogue being able to continue services, he would not be supporting the application, but he saw the other community groups coming in as a compliment to the area, not a competition, and that diversity of offering should be embraced. He added that there had been discussion about other community offerings in the Square Mile and knew for a fact there were hundred of museums and community groups

looking for a home, and it was not a nil-sum game. He stated that there were people requesting a cultural activation or a community offering in the new schemes coming up and there was certainly no shortage of community groups, but there was a shortage of space to accommodate them. The Chairman confirmed he would support the scheme and would do so on a balanced perspective that had taken into account all of the argument heard on both sides.

The Chairman moved the meeting to the vote.

The Town Clerk stated that Members were voting on Items 4 and 5 and the recommendations on Pages 565 to 566, and Page 1127 of the main agenda pack with any relevant amendments set out in the addendum packs. Members confirmed they were happy to proceed to the vote on that basis.

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

Votes were cast as follows: IN FAVOUR – 8
OPPOSED – 14
There were no abstentions.

The recommendations were therefore not carried.

RESOLVED – That, planning permission not be granted for the above proposal.

The Chairman asked the Town Clerk to run through the process outlining reasons for refusal.

The Town Clerk stated the following: In line with the Planning Protocol, specifically Appendix A, subsection 2a, the Committee should indicate reasons for refusal with sufficient clarity to enable clear and precise reasons (with reference to relevant policies) to be provided in the Decision Notice. The Protocol provides for instances such as this where, although committee has indicated clear reasons, the precise wording (including relevant policies) cannot appropriately be framed in the forum of the committee meeting. In these cases, the drafting of precise reasons may be delegated to the Town Clerk (after consultation with the Chief Planning Officer and Development Director and the Chairman and Deputy Chairman).

The Chairman moved a Motion.

MOTION: Delegated Authority be granted to the Town Clerk, in consultation with the relevant Officers, the Chairman and the Deputy Chairman, to finalise the precise wording of the minutes and Decision Notice, to be drafted in line with these reasons for refusal.

The Deputy Chairman seconded the Motion.

The Chairman moved the meeting to a debate on the Motion.

A Member addressed the Sub-Committee and stated the importance of the reasons for refusal and the reliance upon them as a material consideration and expressed concern that they would only be viewed by those who recommended supporting the application. The Member stated that the reasons, from the last refusal, were related to the bulk and masing of the proposal regarding the effect on the setting and amenities of the Synagogue, the daylight and sunlight effect, and Historic England's concerns about the views of the Tower of London. The Member added that she believed the reasons for refusal should come back to the Sub-Committee due to the significance and it being a material consideration. The Chairman expressed concern about bringing it back to the Sub-Committee and wanted to get the reasons for refusal actioned as the Officers had listened.

Another Member addressed the Sub-Committee and stated that Officers would usually work up grounds for refusal which would come back to Sub-Committee as had been done last time the application had been discussed and then it was agreed. The Member stated this happened at every other Local Authority and it was not delegated to the Chairman and Deputy Chairman, who had voted for the application, to agree the grounds for refusal. The Member added there was another reason for refusal related to the negative impacts on the Grade II-listed Holland House and suggested it had to come back to Sub-Committee to be agreed. The Chairman responded that the reasons for refusal were issued by the Town Clerk, in consultation with the Director of Planning, the Chairman and the Deputy Chairman, and stated there was an Officer oversight.

A Member proposed an amendment to the Motion. that the reasons for refusal come back to the Sub-Committee for consideration after it had been drafted by Officers.

MOTION: That the reasons for refusal come back to the Sub-Committee for consideration and approval following drafting by Officers.

The Town Clerk stated, for the avoidance of doubt, that Members had before them a Motion put forward by the Chairman and seconded by the Deputy Chairman for the final terms of refusal to be delegated to the Town Clerk in consultation with the aforementioned Officers and the Chairman and Deputy Chairman. The Town Clerk understood that a Member had moved an amendment, that had been seconded, which would amend the Motion in such a way that it would require it to come back to the Sub-Committee. The Town Clerk added, in terms of procedure, that Members could either move the amendment and then vote on it or vote down the original Motion proposed by the Chairman.

The Chairman moved to a vote on the amendment to the Motion.

The Town Clerk confirmed that Members were being asked to vote on an amendment which require the precise terms of the refusal to come back to the Sub-Committee for approval rather than for a Delegated Authority.

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

Votes were cast as follows: IN FAVOUR – 13
OPPOSED – 7
There were no abstentions.

The Motion detailing the amendment to the prior Motion was therefore carried.

RESOLVED – That, the Motion was amended to read: The reasons for refusal were to return to the Sub-Committee for consideration and approval following drafting by Officers.

The Chairman moved to the vote on the amended Motion.

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

The Motion was carried.

RESOLVED – That, the reasons for refusal were to return to the Sub-Committee for consideration and approval following drafting by Officers.

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

The Committee received a report which detailed development applications received by the Department of the Built Environment since the last meeting.

RESOLVED – That, Members noted the report.

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

The Committee received a report which detailed development and advertisement applications determined by the Chief Planning Officer and the Development Director or those authorised under delegated powers since the last report to the meeting.

RESOLVED – That, Members noted the report.

8. **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.

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

The Chairman asked Officers to advise the Sub-Committee on the report on the new NPPF which would outline the changes and implications which was being prepared for Planning and Transportation Committee. Officers informed the Sub-Committee that a report would be going to Planning and Transportation

Committee setting out in detail the changes to the NPPF and how it impacted upon the work of the Committee.

The Chairman noted there had been a recent Government consultation document on planning committees and their structure and asked Officers to advise how the response would be drafted, and how the Committee would be involved. Officers stated that the report would be going to the Planning and Transportation Committee in January before it went to Policy & Resources Committee, and it would contain a draft response to the consultation about the workings of planning committees nationally.

The meeting ended at 2.33 pm

Chairman

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

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Committee:	**Date:**
Planning Applications Sub Committee	31 January 2025
Subject: 99 Bishopsgate, London, EC2M 3XD Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.	**Public**
Ward: Bishopsgate	**For Decision**
Registered No: 24/00836/FULEIA	**Registered on:** 06 August 2024
Conservation Area: N/A	**Listed Building:** N/A

Summary

Planning permission is sought for: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-

storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

An Environmental Statement accompanies the scheme.

The scheme would be of exceptional design quality, delivering best-in-class Grade A office floorspace, meeting one of the primary objectives of the City's Local Plan 2015, emerging City Plan 2040, and London Plan policies, as well as providing a unique, standalone Pavilion Building for cultural use, alongside extensive public realm improvement works.

The site is within the Central Activities Zone and is highly sustainable with excellent access to transport infrastructure and which is able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is of considerable size and can accommodate a large amount of commercial floorspace within the height constraints. As such, the site is of considerable strategic importance and crucial to the City's growth modelling. The scheme would deliver over 99,000sq.m of lettable Class E commercial floorspace with associated ancillary space, and would deliver 8.3% of the required commercial space to meet projected economic and employment growth demand. This quantity of floorspace would be a strategic contribution to maintaining the City's position as the world's leading international financial and business centre. The floorspace has been designed to be flexible and adaptable for a range of occupier needs and future demand. This floorspace would help deliver an estimated net increase of 4635 FTE jobs.

The scheme delivers an increased and significant enhancement of public realm through the opening up of the ground floor and creating a route through the site, opening up from Wormwood Street through to 55 Bishopsgate to the south, alongside wider links to Liverpool Street station and the rest of the City Cluster. The site would play its part in the wider public realm enhancements occurring throughout the area, connecting into the Tower 42 estate to the west with the introduction of a large permeable accessible ground floor, open to the public 24 hours a day.

The scheme would provide a new retail/food and beverage hub at ground floor, the City Market, which would drive footfall and spend as well as significantly animating the ground plane, providing spill out seating areas into the adjacent improved public realm. This would transform the site into a key gateway into the Cluster from the north and significantly improve the arrival experience.

1,600 long term bicycle spaces would be provided with associated shower and locker facilities, alongside 144 short stay spaces, in a standalone cycle hub accessible to the public. Servicing to the site would take place from a contained basement, accessed via a ramp from Old Broad Street, where consolidation of a minimum of 50% would equal a total maximum of 96 delivery and servicing trips per day. Significant improvements to Wormwood Street and the A10 Bishopsgate through S278 agreement weigh in favour of the scheme, and would help link to the wider transformational public realm improvements.

The scheme would be 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, including at 10, 25 and 26 Wormwood Street. 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 or sunlight to nearby dwellings or religious buildings to unacceptable levels such that it would warrant a refusal of permission.

The building would be designed to high sustainability standards, including an air quality positive approach to minimising emissions and exposure to harmful pollutants, an increase in local greening and ecological value, energy efficient, targeting BREEAM 'Outstanding' and adopting Circular Economy Principles and integrated urban greening.

Consultee responses and objections have been received from Historic England, St Paul's Cathedral, and third-party objectors, which relate to: appropriateness of the site for a tall building; quality and thoroughness of information submitted; a questioning of the justification and impacts of the proposed tower on St Paul's Cathedral and other designated heritage assets in Westminster (with reference to strategic views); a City conservation area; and other listed buildings. Whilst officers do concur with some of these concerns to a degree, there is clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Officers consider the proposals are supported by a clear and convincing justification for a tall building on this site. The site is appropriate for a tall building and is an essential strategic delivery location, contributing to the consolidation of the City Cluster. This position is supported by the GLA. A full assessment of the proposal against London Plan policy D9 is included in the report and concludes the policy would be very largely complied with apart from D9 C (1; a; 1) long range visual impacts; the proposal would comply with the various requirements of Local Plan policy CS 14 and the relevant parts of emerging City Plan policy S12. There

is a conflict with Local Plan Policy CS7 (3) and emerging policy S21 (5) in relation to the impacts identified on the settings of designated heritage assets.

There would be further conflict with emerging policy DE4 (3) as a result of the lack of an elevated public space in the proposal, although this is considered justified by the provision of other spaces and uses, and the rest of the policy would be complied with.

The proposal would be an exemplar of intelligent design and exudes architectural excellence; it would introduce an exceptional new addition to the north-western edge of the Cluster, which would be of dynamic and distinctive architectural character at street level and in mid and long range visual experiences.

Officers consider the diagrid architectural design of the building would be a well-layered and a unique piece of design that expands and humanises London's public realm, creating new routes, and opportunities for urban greening. A vibrant colonnaded ground floor public market hall and the high-level terraces for the office use would make a significant beneficial contribution to the landmark qualities of the building, befitting the pivotal location of the site at the northern gateway into the City Cluster.

A companion pavilion building, Open Gate, would be equally expressive introducing a distinct, purpose-built cultural hub across six levels, outwardly denoting its function, and uniquely enriching this fringe of the cluster.

The quality and vision of the architecture, public realm and urban design are 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, DE1-3, DE4 (1-2) and DE5-8, HL1, and London Plan Policies D3, D4 and D8. 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 2024 and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

The scheme is design-led and has accounted for strategic heritage considerations, having been designed to accentuate the unique characteristics and spirit of the City of London.

Officers have sought mitigation measures to reduce adverse impacts, but also identify the proposals would fail to enhance the characteristics and composition of LVMF 15B 1-2 , 17B1-2 and 26A. In the river prospect experiences, the proposal would slightly and momentarily reduce the sky gap between the City Cluster and the Cathedral, and in doing so, slightly diminish the ability to appreciate St Paul’s

Cathedral as the Strategically Important Landmark, whilst otherwise preserving the relationship between the river frontages and key landmarks. In the case of LVMF 26A, the proposal would slightly erode the ability to appreciate the composition of some key foreground landmark elements and St James's Park, a Registered Park and Garden (RPG). As a result, there would be conflict with London Plan Policy HC4 (A), Local Plan Policy CS13 (1) and emerging City Plan 2040 Policy S13 (1).

It has also been found that the proposal would result in minor enhancement of a number of panoramic strategic views and local views of neighbouring boroughs including LVMF 1 A 1-2 Alexander Palace, LVMF 4A1-2 Primrose Hill, LVMF 5A 1-2 Greenwich Park and LVMF 6A.1 Blackheath.

The proposal would preserve the composition and characteristics of neighbouring borough views other than WCC Local Views 34, V42 (A) and V 43 (A). The proposals would draw some more limited conflict with Local Plan policy CS13(2)) and emerging Local Plan S13 (2) in that, whilst preserving views of most relevant City Landmarks and Skyline Features, it would momentarily but adversely affect the setting of St Paul's Cathedral in views from Waterloo Bridge and to a lesser extent from Hungerford Bridge.

As a result of these impacts on views, it follows there are also indirect impacts to the settings and therefore the significance of the listed buildings in question: St Paul's Cathedral (I), St James Park RPG (I), and to Whitehall Court (II*), Horse Guards (I) and War Office (II*) as designated heritage assets. Officers have identified varying levels of impact from low to very slight less than substantial harm by virtue of a change to setting.

As set out in Paragraph 212 of the NPPF 2024, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). St Paul's Cathedral is a Grade I listed building, St James's Park (RPG Grade I) and Whitehall designated assets are grade I and II*, and this places these close to the very highest status and as a result, correspondingly great weight should be given to the conservation of these assets.

NPPF paragraph 215 requires that any less than substantial harm be weighed against the public benefits of the development proposal. The paragraph 215 balancing exercise is to be applied when considering the indirect impacts resulting from less than substantial harm to designated heritage assets of the utmost heritage value.

Therefore, an evaluation of the public benefits and the weight afforded to them has

been undertaken. In doing so, proportionately great weight has been attached to the heritage significance of the designated heritage assets and to the advice from Historic England. The public benefits of the proposals include the delivery of a highly strategic quantity of office floorspace in a very sustainable location; the provision of an accessible public offer comprising a market hall and the provision of a bespoke cultural pavilion; the provision of new routes and improved external public realm for a range of users across the site; uplift in urban greening and biodiversity; and with the uplift in office floorspace with the associated creation of additional jobs, and annual worker expenditure in the emerging City Cluster and its surroundings.

In this case it is considered that the varying low to very slight levels of less than substantial harm to the Grade I and II* listed heritage assets and Registered Park and Garden is decisively outweighed by the public benefits of the proposal, and accordingly the requirements of paragraph 215 are met. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties.

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 material considerations indicate otherwise. It is the view of officers that, as a matter of planning judgement, that the proposals would make a significant contribution to advancing the strategic business objectives of the City.

The scheme would provide benefits through CIL (of approximately £30 million (indexed)) for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

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

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

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

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

Recommendation

(1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);

(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 agreement under 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;

(3) That Members note that the proposal will require the rescission of the City Walkway through the Site and that should the development proceed, a report will be taken to the Planning and Transportation Committee seeking authority to rescind the necessary parts of the City Walkway; and

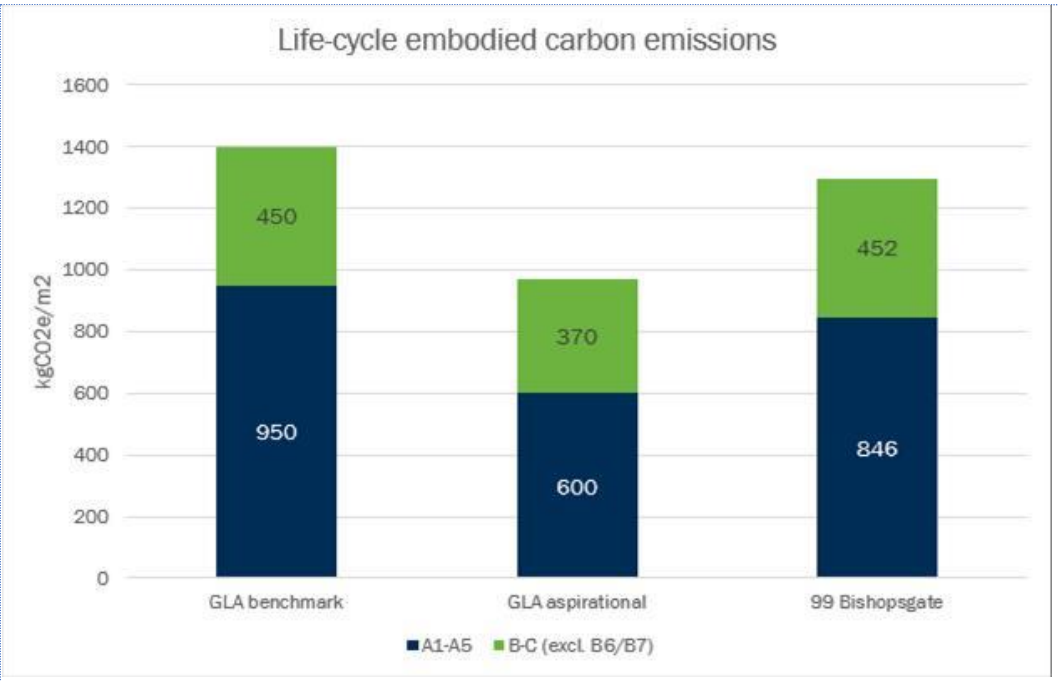
(4) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

APPLICATION COVER SHEET

TOPIC	INFORMATION			
1. SITE PHOTOS/ VISUALS				
2. HEIGHT	Existing		Proposed	
	<u>Main Building:</u> 1. AOD to top of main building: 121.5m 2. AOD of Podium: 20.5m		<u>Tower:</u> 1. AOD to top of main building: 240.5m 2. AOD to top of lift core: 253.5m <u>Pavilion Building:</u> 1. AOD to parapet of building: 52.5m <u>Cycle Hub:</u> 1. AOD to top of building: 26m	
3. FLOORSPACE GIA (SQM)	Uses	Existing	Proposed	Net Change
	Office (Class E(g(i)))	44,605	99,005	54,400
	Ancillary Class E	9,257	40,840	31,583
	'City Market' Retail / Restaurant (Class E(a/b)) / Drinking Establishments (Sui Generis)	482	1,237	755
	Cultural	0	2,410	2,410
	Cycle Hub (Sui Generis)	0	648	648
	Total	**54,344**	**144,140**	**89,796**
4. OFFICE PROVISION	99,005			

IN THE CAZ (GIA SQM)		
5. EMPLOYMENT NUMBERS	Existing	Proposed**
	3230*	8020 Gross FTE 4635 Net FTE*** Plus 2184 per year during 4.75-year construction period.
	*Includes existing office floorspace and retail floorspace. **Proposed FTE employment based on office commercial uses (E(g)), café/restaurant uses (E(a/b)) and/or drinking establishments (Sui Generis), and cultural and maker spaces (Class F1, Sui Generis and Class E(g)(i)) floorspace figures and appropriate employment densities (HCA, 2014). ***Proposed Net FTE employment based on Gross FTE Employment LESS existing (3230), LESS displacement contingency (25%), and with economic multiplier of 1.29.	
6. CYCLE AND CAR PARKING	Existing	Proposed
	Cycles Long Stay: 91 **Cars** 23	**Cycles** Long stay: 1600 (80% of London Plan requirement as agreed with TfL) i. 1280 two-tier, three-tier and Sheffield stands (B1 and L2 of cycle hub) (80%) ii. 240 three-tier cycle lockers (15%) iii. 80 larger spaces (5%) Short stay: 144 i. 127 (95%) in public cycle hub ii. 7 Sheffield stands on street (5%) Showers: 195 Lockers: 1320 **Cars** 0 1 blue badge bay
7. PUBLIC REALM	Existing	Proposed
	158sqm	External: 1601sqm Internal publicly accessible: 1463sqm 1013% increase over existing

8. TREES	Existing	Proposed
	1 (Ginkgo Biloba to southeast of site – within Site but outside ownership boundary)	• 3no. Proposed single stem trees (Metasequoia glyptostroboides) on Bishopsgate street. • 1.no Proposed single stem tree (gingko biloba). within the pocket park. • Retention of existing Ginkgo Biloba
9. SERVICING VEHICLE TRIPS	Existing	Proposed
	Unconsolidated: 219	Unconsolidated: 212 daily trips Consolidated: 96 daily trips i. 72 cars/vans ii. 24 MGVs
10. SERVICING HOURS	Overnight between 1900 and 0700 daily, with limited trips outside of peak hours during the day.	
11. VOLUME OF RETAINED FABRIC	Overall – 48% retention by mass of the existing building (consists of the existing raft and piles)	
12. REGULATED OPERATIONAL CARBON SAVINGS	**Overall improvements against Part L 2021: 16 %** **GLA requirement: 35 %** Be Lean stage improvements against Part L 2021: 15 % GLA requirement: 15 % Be green stage improvements against Part L 2021: 7%	
13. OPERATIONAL CARBON EMISSION	Over 60 years absolute: **128,905 tonnes CO2** Over 60 years per square meter: **913.9 kg CO2/m2**	
14. EMBODIED CARBON EMISSIONS		



Embodied Carbon:

- life-cycle modules A1-A5 (Product and construction process stage) **119,295 tonnes CO_2e (846 $kgCO_2e/m^2$)**

- life-cycle modules B – C (except B6 and B7 operational carbon) (in use stages) **63,673 tonnes CO_2e (452 $kgCO_2e/m^2$)**

Total embodied carbon: **182,971 tonnes CO_2e (1,297 $kgCO_2e/m^2$)**

15. WHOLE LIFE - CYCLE CARBON EMISSIONS

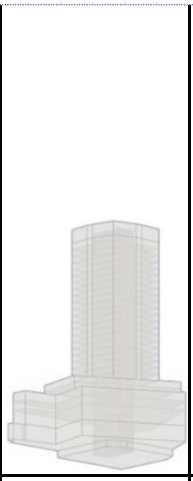
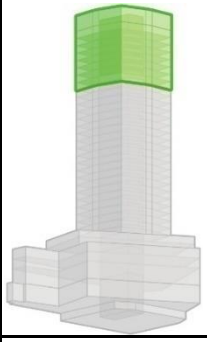
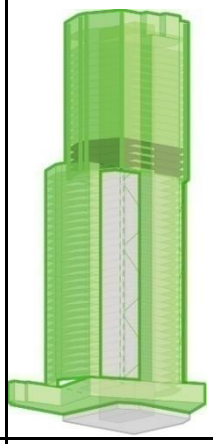
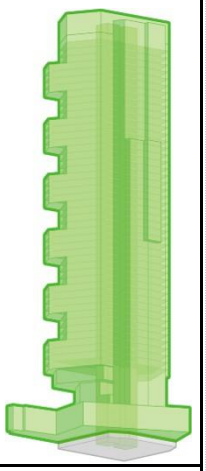
A1-C4, including B6 & B7

Total whole life-cycle carbon emissions: **311,936 tonnes CO_2e**

Total whole life-cycle carbon emissions per square meter: **2,212 $kgCO_2e/m^2$**

16. WHOLE LIFE-CYCLE CARBON OPTIONS

	Option 1	Option 2	Option 3	Option 4

				
Gross Internal Area (GIA) m²	42,522	51,188	101,896	135,355
Substructure % retained by mass	100	100	80	100
Superstructure (Frame, Upper floors, roof, stairs, ramps) % retained by mass	100	94	60	0
Facade (External walls, windows, doors) % retained by area	100	0	0	0
Estimated / target Energy Use Intensity (EUI) kWh/m²	180	120	90	70
	CARBON INTENSITY (emissions per m²)			
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *excl.*	243	411	893	756

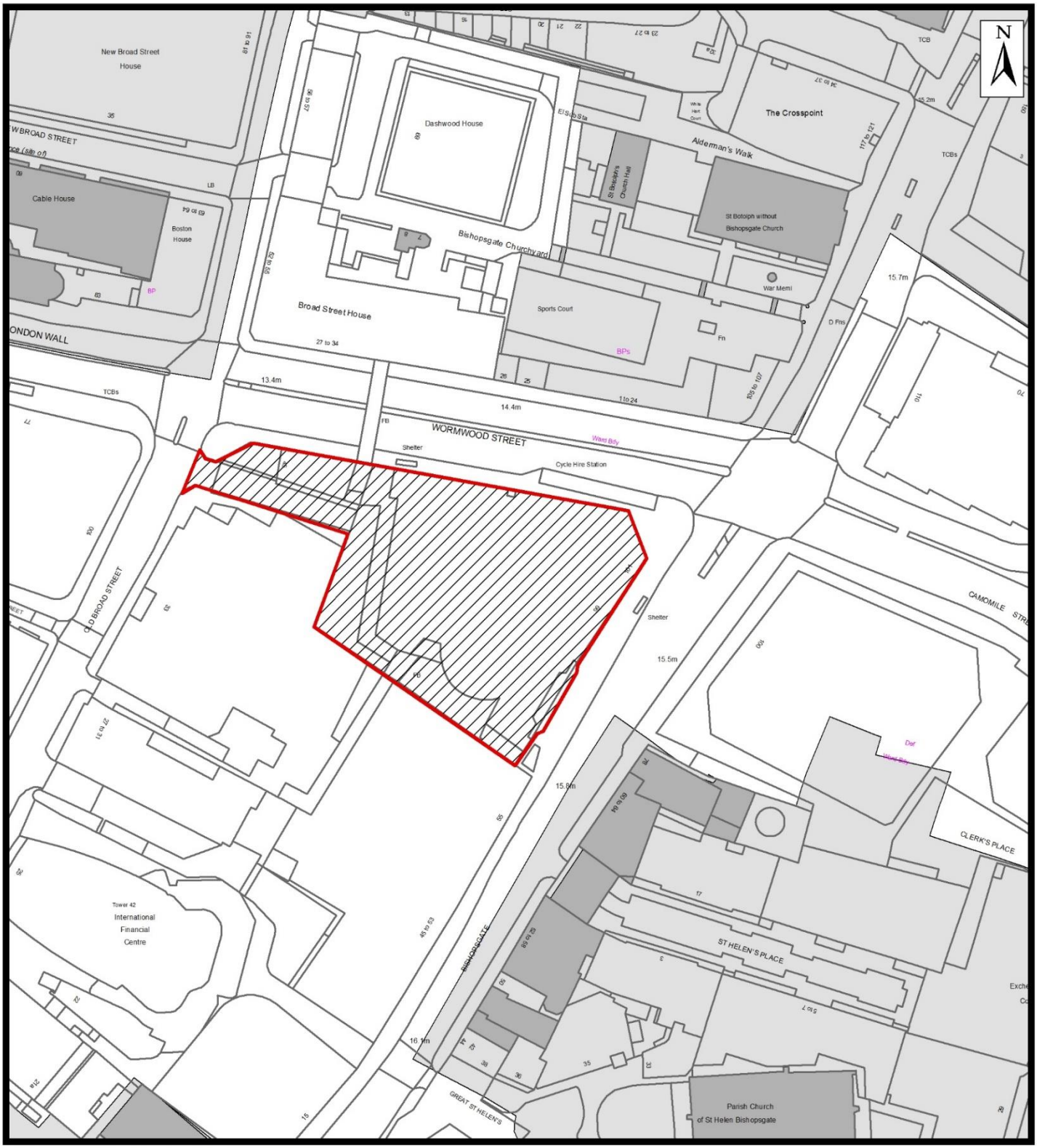
	sequestration				
	Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	615	783	1,265	1,128
	Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	316	211	158	123
	Total WLC Intensity (inc.B6 & pre-demolition) ($kgCO_2e/m^2$ GIA)	931	997	1,430	1,264
		ABSOLUTE CARBON EMISSIONS			
	Upfront Embodied carbon (A1-A5) (tCO_2e)	10,333	21,038	90,993	102,328
	Operational Carbon for building lifetime (B6) (tCO_2e)	13,438	10,785	16,101	16,635
	Total WLC (incl. B6 and pre-demolition) (tCO_2e)	39,589	51,018	145,713	171,075
17. TARGET BREEAM RATING					

Good	Very Good	Excellent	Outstanding

Aspiring to Outstanding (policy target Excellent or Outstanding)

	BREEAM New Construction 2018 Shell & Core Office – Outstanding BREEAM New Construction 2018 Shell & Core Retail – Excellent BREEAM New Construction 2018 Shell & Core Exhibition – Excellent
18. URBAN GREENING FACTOR	0.305 (policy target 0.3)
19. BIODIVERSITY NET GAIN	0.83 bu/Ha 248.29 % increase (GLA)
20. AIR QUALITY	Implementation of Air Quality Mitigation Measures as set out in Chapter 8 (Air Quality) of the ES

Site Location Plan



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ADDRESS:
99 Bishopsgate

CASE No.
24/00836/FULEIA

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Existing Site Photographs

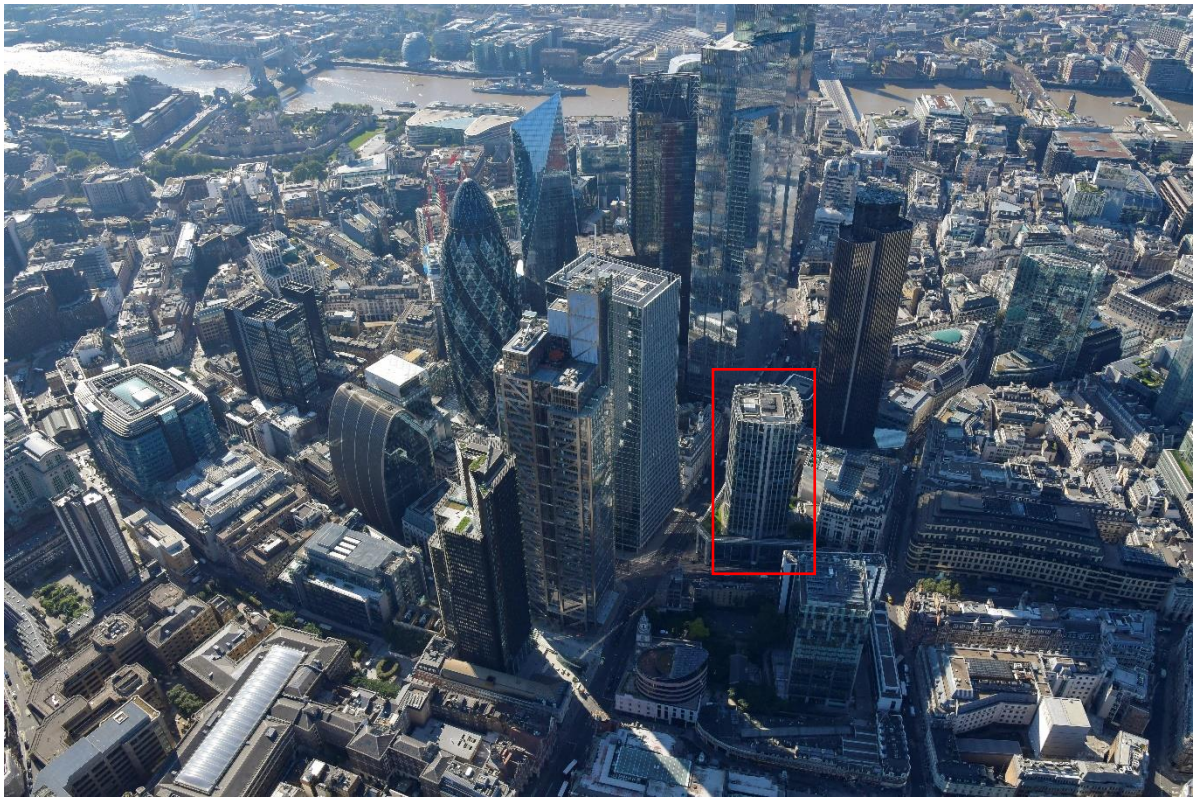


Image 1: Existing City Cluster (existing building outlined in red)



Image 2: Existing Site from Wormwood Street/Bishopsgate junction



Image 3: Aerial View of the existing building (© Jason Hawkes)



Image 4: North elevation of the existing building with City Walkway Bridge



Image 5: City Walkway Bridge into existing site

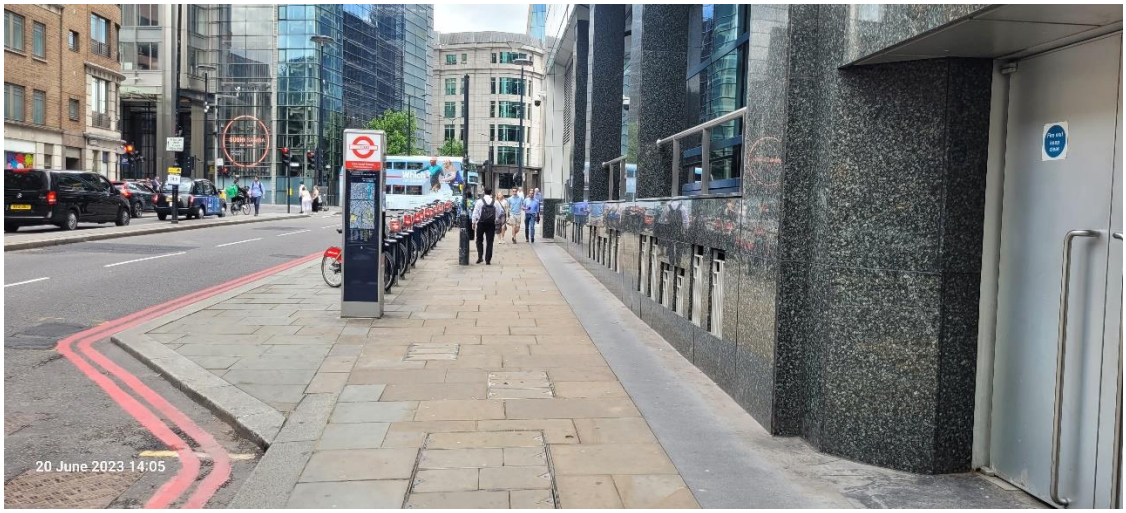


Image 6: Existing pavement widths to north elevation (Wormwood Street)

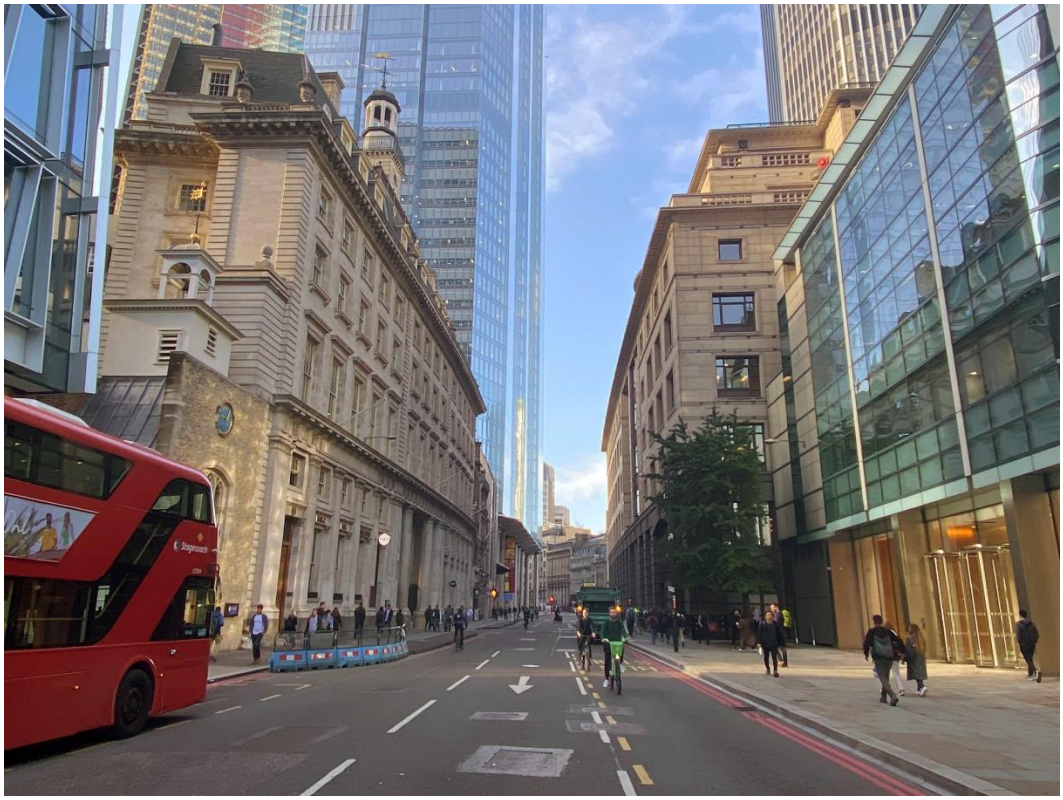


Image 7: East elevation of and entrance to existing building (right)



Image 8: West elevation of existing building with servicing ramp from Old Broad Street

Proposed Site Images



Image 9: Proposed CGI of City Cluster





Image 10 and 11: Proposed northeast and north elevation CGI from Bishopsgate/Wormwood Street Junction and Liverpool Street



Image 12: Proposed northwest CGI from London Wall



Image 13: Proposed Pavilion Building 'Open Gate' CGI from north



Image 14: Proposed northeast corner entrance CGI



Image 15: Proposed northeast corner detail

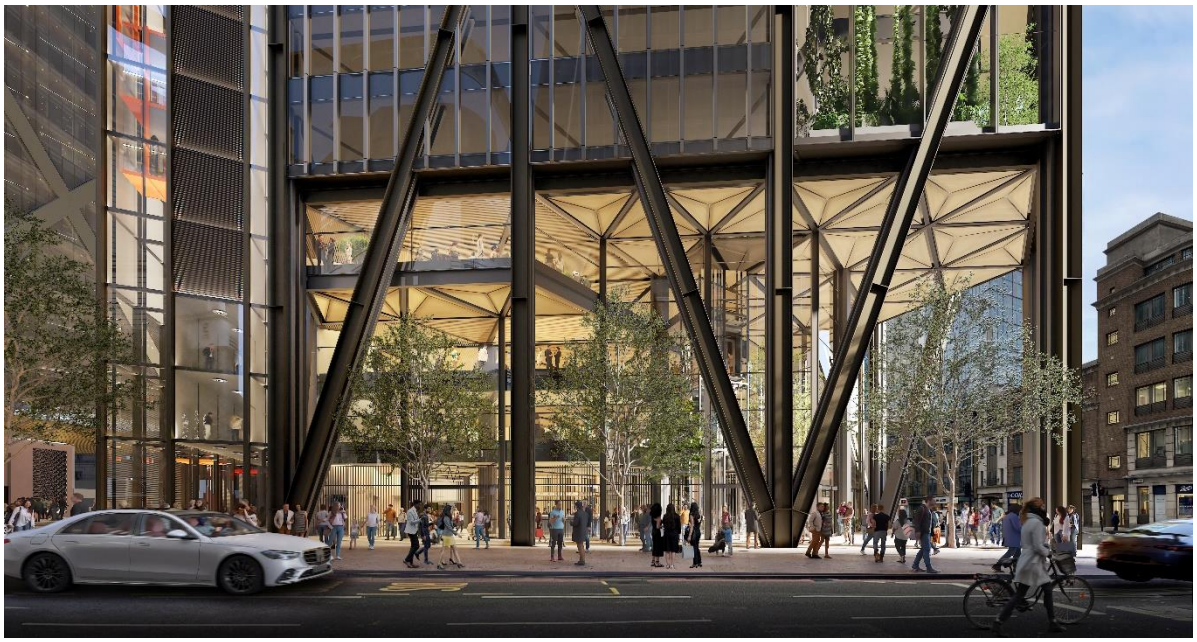


Image 16: Proposed east ground plane from Bishopsgate

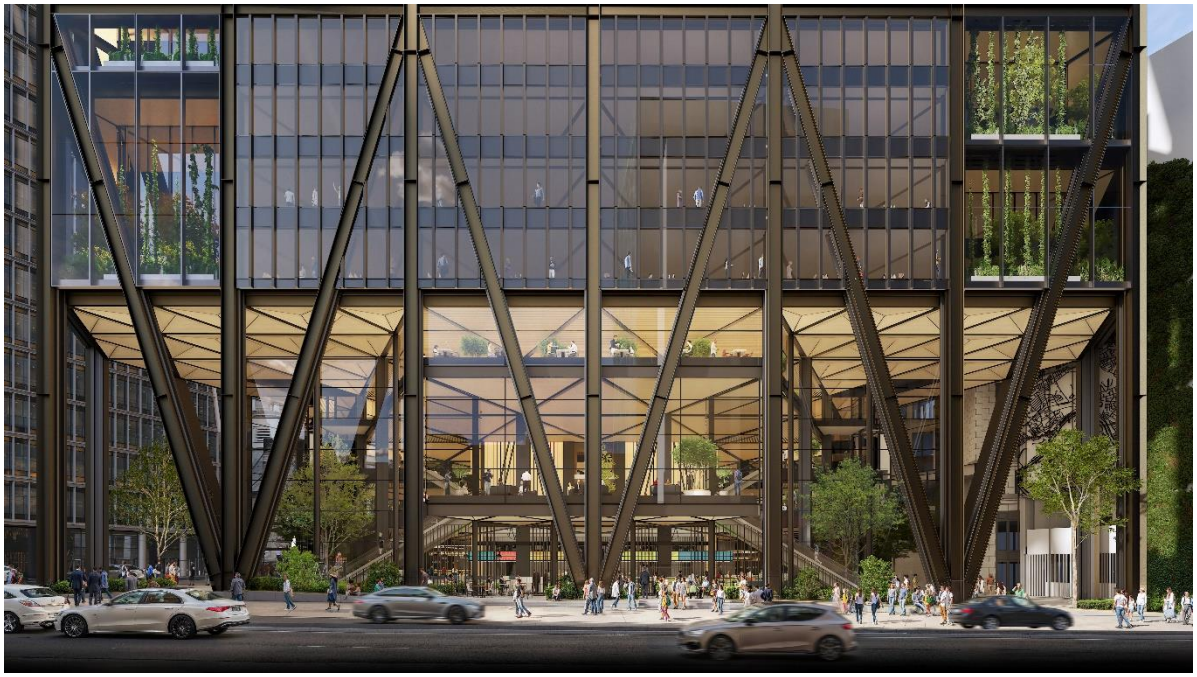


Image 17: Proposed north ground plane from Wormwood Street



Image 18: Proposed northwest corner detail



Image 19: Proposed 'rear' elevation and junction with 55 Bishopsgate



Image 20: Proposed City Market entrance from Wormwood Street



Image 21: Proposed City Market entrance from new public route



Image 22: Proposed City Market outdoor seating



Image 23: Proposed office reception (first floor level)



Image 24: Proposed level 48 terrace



Image 25: Proposed typical northwest terrace

Main Report

Introduction

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 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:
    - To examine the environmental information
    - To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at the first bullet point above (Regulation 26(1)(a) of the EIA Regulations), and where appropriate, their own supplementary examination
    - To integrate that conclusion into the decision as to whether planning permission or subsequent consent is to be granted; and
    - 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 or subsequent consent for EIA development unless satisfied that the reasoned conclusion referred to above at the second bullet point (Regulation 26(1)(b) of the EIA Regulations) is up to date, and 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 draft 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 anybody 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. An addendum note qualitatively assessing relevant changes to nearby cumulative schemes within the study area was requested and received in December 2024. This addendum note did not contain additional environmental information required to be published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and instead provides clarifications on nearby cumulative schemes rather than amending information related to the Proposed Scheme itself. No new likely significant effects were identified. The addendum note forms part of the overall environmental information and should be read in conjunction with the submitted Environmental Statement (ES) which is available online along with any further representations received in conjunction with the information.

8. The effect interactions of each of the likely significant effects has been considered in the assessment. Mitigation and monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement as appropriate.

Site and Surroundings

9. The proposals relate to a 0.41-hectare site which sits on the junction of Wormwood Street and Bishopsgate. It is bounded by 55 Bishopsgate and 33 Old Broad Street to the south, Old Broad Street and Union Court to the west, Wormwood Street to the north, and Bishopsgate to the east.

10. The existing building dates to 1976, designed by architects R. Seifert & Partners, and comprises a 28-storey tower above a 5-storey podium, with a single basement level beneath. The existing building is 121.5m AOD high to the top of the tower, and circa 20.5m AOD high to the top of the podium. The building fills the majority of the existing site with very little public realm.

11. The building was severely damaged by the IRA bomb in 1993, and subsequently refurbished and re-clad with two additional storeys added to the podium, totalling 5-storeys. These works were completed in 1995.

12. The main pedestrian accesses into the site are from Bishopsgate, with the exception of the 'Be At One' bar unit which is accessed from the junction of Old Broad Street and Wormwood Street. Vehicular access to the site is via Union Court, a servicing ramp off Old Broad Street.

13. The building has a total of 54,344sqm GIA which is comprised of 44,605sqm of Class E office floorspace, 9257sqm of ancillary Class E floorspace, and 468sqm of Sui Generis drinking establishment floorspace.

14. The site contains 'City Walkway' which runs through the site from the pedestrian bridge over Wormwood Street from 55 Old Broad Street. The City Walkway then continues through the site, down to 55 Bishopsgate and the Tower 42 Estate to the south. The bridge and City Walkway have not been in use for some time, and in 2018 your Planning and Transportation Committee resolved to discontinue these sections of City Walkway, which has not yet taken effect. The removal of the pedestrian bridge connection between the site to the north and the application site was included as part of the planning permission for the neighbouring site at 55 Old Broad Street (reference 23/00469/FULEIA), granted on 19 December 2024.

15. The existing building is not statutorily listed, nor is it within a conservation area.

16. However, there are a number of designated heritage assets in the immediate vicinity of the site. These include:
    - St Helen's Place Conservation Area;
    - Bank Conservation Area;
    - Bishopsgate Conservation Area;
    - Bishopsgate Guild Church of St Ethelburga The Virgin (Grade I);
    - Great St Helen's Church of St Helen Bishopsgate (Grade I);
    - Church of All Hallows, London Wall (Grade I);
    - Church of St Botolph-without-Bishopsgate (Grade II*);
    - St Botolph's Church Hall, Bishopsgate Churchyard, drinking fountains, overthrows and lanterns, and Bishopsgate Parish War Memorial (Grade II);
    - Victorian Bath House, 8 Bishopsgate Churchyard (Grade II);
    - 56-60 New Broad Street (Grade II);
    - Hasilwood House, 52-68 Bishopsgate (Grade II);
    - 46 and 48 Bishopsgate (Grade II);
    - 15 Bishopsgate (Westminster Bank) (Grade I);
    - 37 and 38 Threadneedle Street (British Linen Bank) (Grade II);

- 3-5 Bishopsgate (Royal Bank of Scotland);
- 7-9 Bishopsgate and 39 Threadneedle Street (Lloyds Bank) (Grade II);
- City of London Club, 19 Old Broad Street (II*)

17. Other designated heritage assets in the immediate and much wider area include:
    - The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
    - St Paul's Cathedral (Grade I)
    - Royal Exchange (Grade I)
    - Leadenhall Market (Grade II*);
    - National Bank Lothbury (Grade II*)
    - 12- 14 Austin Friars (Grade II)
    - 23 Austin Friars (Grade II
    - 7 and 9 Gracechurch Street (Grade II)
    - The Monument (Scheduled Monument and Grade I);
    - The Guildhall listed Grade I, Guildhall Library and Museum (Grade II*)
    - St Lawrence Jewry (Grade I)
    - Tower of Former Church of St Augustine (Grade I)
    - Former Port of London Authority (Grade II*)
    - Liverpool Street Station (grade II)
    - Great Eastern Hotel (grade II*)
    - Tower Bridge (Grade I)
    - Leadenhall Conservation Area
    - St Paul's Conservation Area
    - Guildhall Conservation Area
    - New Broad Street Conservation Area
    - Finsbury Circus Conservation Area
    - Finsbury Circus Registered Historic Park and Garden (Grade II)
    - Liverpool Street Arcade (Non-designated heritage asset)
    - 32 St Mary Axe (Non-designated heritage asset)
    - St Botolph Churchyard (Non-designated heritage asset)
    - Bunhill Fields and Finsbury Square Conservation Area
    - Whitehall Court (Grade II*)
    - Horse Guards (Grade I)
    - War Office (Grade II*)
    - St James Park Registered Historic Park and Garden (Grade I)
    - Ministry of Defence (Grade I).
    - Whitechapel High Street Conservation Area
    - Wentworth Street Conservation Area

18. The Site appears in a number of views as set out in the London View Management Framework (2012) but does not sit within the Landmark Viewing Corridors or Background Wider Setting Consultation areas of any of these identified views.

19. Bishopsgate forms part of the Transport for London Road Network (TLRN) for which Transport for London (TfL) is the Highway Authority.

20. The site is located within the Eastern Cluster as set out in the Local Plan 2015 and the City Cluster key area of change as set out in the emerging City Plan 2040. The site also sits within the Central Activities Zone (CAZ).

21. The area around the site is characterised primarily by commercial buildings with 12no. residential units situated immediately opposite the site to the north on Wormwood Street, and a number of surrounding churches.

22. The site is well connected to transport links and has the highest Public Transport Accessibility Level (PTAL) of 6B. Liverpool Street and Moorgate Stations are in close proximity to the site, with a number of London Underground, Overground, Elizabeth Line and National Rail services, and a significant number of bus stops are within walking distance of the site.

23. The site is located in Flood Zone 1 and within an Air Quality Management Area.

Relevant Planning History

24. The site has an extensive planning history. The latest relevant applications are as follows:
    - Ref. 3264CH – Recladding of the tower element of office building following bomb damage (Granted June 1994).
    - Ref. 3264CJ – Recladding of tower and podium following bomb damage and alterations to podium including two additional floors (Granted February 1996).

Background to the Development Proposals

25. The scheme has been subject to extensive pre-application discussions with the Local Planning Authority and other stakeholder groups including Historic England, the Greater London Authority (GLA), Transport for London (TfL) and the Surveyor to the Fabric of St Paul's Cathedral. The development proposals have changed significantly in this time throughout and following pre-application feedback from Officers and other stakeholders.

26. These changes include:
- Early plan form of the Tower, offset of the Tower from 55 Bishopsgate, and form of the Pavilion building amended in response to wind tunnel tests that revealed significant issues with ground-level wind conditions;
- The height of the support core of the Tower was increased in height over and above the bulk of the main building to create a more graduated transition from the tower to 55 Bishopsgate and overall massing of the Cluster in this location to correspond to the contour heights;

- Alteration to the form of the tower to its northwest elevation at high level to an inclined profile, to open up visible sky to St Paul's Cathedral in views from the west;
- Introduction of large open terraces to northwest elevation for both wind mitigation and to soften the western leading edge in views from the west;
- Retention of the existing building structure below ground due to carbon optioneering;
- The primary structural expression of the building was amended from sitting in front of the glazing to sitting behind the glazing on the northwest and northeast corners, giving lighter edges;
- Colouration of the structure shifting from dominant lighter bronze to darker bronze-grey to transition between the warmth of the historic buildings in the Bishopsgate Conservation Area to the north, and the Cluster to the south and east. This change also assists with longer range townscape views from the west and aids in highlighting different functional elements of the building;
- Appearance of southern support core amended to more clearly express its structural expression and functional elements;
- Design of the public realm colonnades amended to better articulate their relationship with the building above, but also creating a human scale for pedestrians;
- Entrances to City Market and office lobby amended into distinct entrances for greater legibility for the public; and
- Overall design and form of the Pavilion building re-designed to become a distinct architectural expression, clearly independent of the host Tower, including addition of the map of London as the outer veil giving the building its individual identity.

Application Proposals

27. Planning permission is sought for:

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Demolition and Basement Works

28. In more detail, the existing building would be demolished down to ground, with the existing 3m thick concrete structural raft slab, wall and piles retained. These amount to 48% of the existing building by mass. The basement would then be extended laterally and vertically to form a total of three subterranean levels, with a maximum depth of minus 4.17m AOD.

29. At Basement Level 1, there would be plant area, loading bays, one blue badge parking space, cycle store, and refuse store.

30. At Basement Level 2, there would be plant area and changing rooms. At Basement Level 3, there would be plant area only.

Removal of Walkways

31. As part of the demolition of the buildings, the City Walkway that runs through the Site, beginning from the southern end of the bridge over Wormwood Street and continuing south to 55 Bishopsgate, would be removed. It is recommended that, should your Committee resolve to grant planning permission for the proposals herein, that delegated authority be sought in order to prepare the rescission of the City Walkway, to be approved by Planning and Transportation Committee before the rescission is brought into effect and the walkway formally rescinded.

Site-wide

32. The above ground proposals relate to three new buildings; the Tower, the Pavilion, and the Cycle Hub.

33. Externally at ground floor, generous new routes through the Site would be created, linking the three buildings proposed to the surrounding public realm and neighbouring sites, covered by a perimeter colonnade. The entrances to the office lobby, located at levels GF Mezzanine, 1 and 2, would be from the northwest and northeast corner, separated off from the City Market. The entrances to the City Market are located across the ground plane, demarcated by iron gates akin to the markets at Smithfield and Billingsgate with foldable glazed doors behind, providing a sense of enclosure whilst retaining visibility through the Site, and providing permeability across the Site.

34. A new pocket park with new tree planting would be created around the existing Ginkgo Biloba tree, that is to be retained, between the Site and 55 Bishopsgate.

35. At roof level across the Site, there would be biodiverse green roof areas atop the Pavilion and Cycle Hub buildings. At roof level of the Tower, levels 54 and 55 are open topped, double-height plant areas. The roof structure above these is open to allow free-air flow, but follows the same structural grid as the soffits throughout the Site, providing consistent architectural language. The southern core then rises above this to level 58, and would house plant at these levels. Levels 56 and

58 would also house the Building Maintenance Unit (BMU) enclosure, and track and housing.

Tower

36. The main building proposed (the Tower) would rise to 53 storeys above ground (plus plant). The height of the main building would be a maximum of 240.5m AOD, and the height to the top of the plant and lift overrun would be a maximum of 253.5m AOD.

37. The Tower would be primarily for office use (Class E(g)(i)), with complementary food and beverage offering at ground floor level, known as the City Market.

38. The Tower comprises predominantly commercial office floorspace, provided from Level 04 to Level 53. The floorplates reduce in size as the building reaches level 40 due to the incline of the northwest corner. Amenity areas for office tenants are provided on every level from 04 to 53, comprising four-storey external accessible terraces at levels 8, 16, 24, 32, 40 and 48 on the western promontories, and internal double height winter gardens on the eastern promontories. Level 03, above the publicly accessible space and office lobbies at levels 01 and 02, is designed to be flexible Class E floorspace.

Pavilion Building

39. A building for new cultural space is proposed to the northwest of the Site, on the junction of Wormwood Street and Old Broad Street, in place of the existing 'Be At One' bar unit. This would accommodate new flexible, cultural floorspace across 6 accessible levels, with two levels of plant above, and serviced by the sitewide basement below.

40. The Pavilion building would provide a new 'gateway' to the Cluster from the north, and is a unique, standalone building which is accessible at ground, publicly accessible throughout subject to cultural programming, and is highly visible at the junction of existing and emerging pedestrian routes.

41. The north face of the Pavilion building would feature a 160sq.m green wall, and as above the roof of the pavilion would feature a 24.3sq.m green roof.

42. At ground and first floor levels of the Pavilion Building would be the 'Glass Gallery' - a free, publicly accessible exhibition space.

43. At second and third floor levels would be the 'Hall' and associated back of house production space, available for free and affordable ticketed events.

44. At fourth and fifth floor levels would be the Studios, featuring subsidised creative workspace.

45. Finally, at levels 6 and 7 would be ancillary plant beneath the green roof. At level 6 of the building would be large lettering advertising the name of the building, 'Open Gate'. The whole building would be wrapped in a map of London, creating a unique, distinctive, and easily identifiable piece of architecture.

46. A potential Cultural Anchor and Operator, Intermission Youth (a charity currently sharing space in LB Hackney), has been identified and is engaged in discussions with the Applicant.

Public Cycle Hub

47. The Cycle Hub comprises a ground plus two-storey building, accessible to the public. It is also serviced by the sitewide basement levels, and as above features a green wall and green roof. It is accessed from the new routes created throughout the Site.

Consultations

Statement of Community Involvement

48. The Applicants have submitted a Statement of Community Involvement prepared by Kanda Consulting dated May 2024, outlining their engagement with stakeholders. Further, there was a number of co-design sessions with London creatives (18-25yrs) as part of the culture plan to inform the Pavilion design and overall cultural offer.

First Phase of Engagement:

49. The Applicants' first phase of engagement, which took place between 19th October 2023-23rd November 2023, included:

- A consultation website launched on 19 October 2023, which received 669 views during the consultation period;
- Newsletters posted to c.1245 addresses, which advertised the consultation and encouraged people to attend the public exhibitions and/or provide their feedback via the website;
- Invitations for briefings sent to Lime Street, Bishopsgate, Broad Street and Portsoken Ward Members, St Helen's Church, St Ethelburga's Centre for Reconciliation and Peace, the EC BID, and neighbouring property owners at 33 Old Broad Street;
- Two public exhibitions were held on 26th October and 31st October 2023, with 33 people attending across both sessions, including representatives of St Helen's

Church, St Botolph's Church, a Lime Street ward member, and a representative of the owners of 33 Old Broad Street;

- Six feedback forms were completed;
- Two stakeholder briefings were held with the Bishopsgate and Portsoken Ward Members; and
- Meeting held with the EC BID to discuss the public realm proposals.

Second Phase of Engagement:

50. The Applicants' second phase of engagement, which took place between 21st March 2024-12th April 2024, included:

- Updates to the consultation website which received 1,339 views during the consultation period;
- A social media advert which pointed to the consultation website, and resulted in 663 website views;
- Newsletters posted to c.1,245 addresses advertising the consultation and encouraging people to attend the public exhibitions and/or provide their feedback via the website;
- Invitations for briefings sent to Lime Street, Bishopsgate, Broad Street and Portsoken Ward Members, St Helen's Church, St Ethelburga's Centre for Reconciliation and Peace, the EC BID, and neighbouring property owners at 33 Old Broad Street;
- Two further public exhibitions were held on 21st March and 26th March 2024 with 65 people attending across both sessions, including representatives of St Helen's Church, St Ethelburga's Centre for Reconciliation and Peace, Deputy Henry Colthurst (Lime Street ward), and a representative of the owners of the neighbouring 33 Old Broad Street;
- 17 feedback forms were completed; and
- At the time that the Statement of Community Involvement was prepared, and further to those that attended the public exhibitions, no offers for further briefings were taken up by stakeholders. Follow-up emails were sent to stakeholders on 27th March and 10th April 2024.

Statutory Consultation

51. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

52. The application was advertised in the press on 17.09.2024.

53. Nearby residential occupiers were notified directly of the application by letter on 17.09.2024.

54. Site notices advertising the application and recission of the City Walkway were posted in 10 locations on 17.09.2024.

55. At the time of publication of this report, 37 objection letters have been received (plus 2 duplicates), as well as 2 letters of support, and 3 neutral representations. A summary of the representations received, and the consultation responses is set out in the table below. The purpose of the table is not to reproduce the content of the significant number of objections but to provide a summary of the objections on a topic-based approach. Not all the representations below relate to material planning considerations. Those that are, have been dealt with in this report.

56. All objections and letters of support made in relation to the application are available on the public file and have been read in full and considered in drafting this report and recommendation. Copies of all received letters and e-mails making representations are attached in full and appended to this report.

Consultee responses	
Department for Levelling Up, Housing and Communities	No comments.
Historic England	Historic England strongly objects to this application and recommends that it should be withdrawn or refused. The harm entailed by these proposals to the significance of one of the nation's finest buildings [St Paul's Cathedral], to that of the historic buildings and landscape at Whitehall and St. James's Park, should attract the highest weight. The proposed development would introduce a very steep edge to the City's tall buildings cluster, close to St Paul's cathedral, in the strategic view of it from Waterloo Bridge, and would reduce the pre-eminence of the cathedral on the skyline, resulting in clear harm to St Paul's Cathedral. Additional harm would be caused to the highly graded listed buildings near Whitehall in the protected LVMF view from St James' Park. Further information is required in order to fully understand the potential impacts on the significance of the grade I listed Church of St Ethelburga opposite the site. <u>Impact of proposals</u>

	a) St Paul's Cathedral: The proposals would erode the clear sky back drop above the Heron Tower adjacent to the cathedral, as seen from Waterloo Bridge - LVMF View 15B.1 in particular. Here, it would create a new profile for the cluster, rising abruptly from Angel Court, resulting in a cliff edge which is noticeably higher than the overall height of the cathedral. The chamfered form of the top of the building offers little mitigation - its leading edge would rise steeply to the apex. In this key view, the impact on the significance of the cathedral would be most damaging. As a consequence of the scale and massing of the proposed development, it would compete with St Paul's Cathedral and would contribute to its visual prominence becoming further diminished, resulting in clear harm to significance and the ability to appreciate it. The large, bulky form of the cluster as a whole would be brought closer to the cathedral, increasing its dominance and cumulative impact. The cathedrals prominence on the skyline would be affected in much wider ranging river views and harm to significance would therefore occur more broadly than just strategic views, albeit to a lesser extent. The view from Somerset House, from where Canaletto's celebrated depiction of the City was painted, is important. The visual impact would be more extreme due to the closer proximity of the cluster to the dome of St Paul's, as shown in View 32 of the Heritage and Townscape Visual Impact Assessment, albeit partly screened by trees. b) The Whitehall Buildings: The proposals would result in harm to the Whitehall buildings and St James's Park, where the development would be seen alongside the consented 55 Bishopsgate behind Duck Island.

	Though of a lower height, so that a smaller proportion of the development would be visible compared to the latter, it would sit directly behind the southern end pavilion roof of Whitehall Court and encroach further into the characterful view. The proposal would harm the significance of these buildings by reducing their prominence and also by visually competing with their picturesque roof forms. This harm would also occur to the registered landscape, which derives some of its significance from its interplay with the historic buildings in its setting described above. It is likely that this harmful impact, in the case of both developments, would be more prominent at darker times of the day. c) <u>The Church of St Ethelburga's:</u> The potential visual impacts on the setting of the church as experienced from its churchyard have not been tested; the cumulative change of both schemes 55 and 99 Bishopsgate could be dramatic. We understand that present wind conditions generated by existing tall buildings has caused a window on the northern elevation of the church to buckle and this has now been boarded up. The proposed development appears likely to further worsen wind conditions around the church. The increase in scale alongside the removal of the existing podium directly opposite it would likely exacerbate the existing problem. Alongside construction impacts, the proposed development may have implications for the viability of the existing use of the former church, which provides for its on-going conservation. <u>Historic England's position</u> The proposals would harm the significance of St. Paul's Cathedral, one of the nation's most important buildings. They would make the form of the cluster more assertive and less deferential, in contrast to

	its existing edge, formed largely by the Heron Tower (110 Bishopsgate), which steps up from the sky gap to a lower apex. The current proposals would create an abrupt upward step at the edge of cluster, much taller than the overall height of the cathedral and closer to it, showing little regard for its significance in the strategic view. The development has instead been designed to step down slightly from a consented scheme that has already been acknowledged by your Authority as harming the significance of the cathedral. Adopted policy and guidance seeks to manage change in a way which would preserve and, where possible, enhance viewers' ability to recognise and to appreciate the cathedral as a Strategically Important Landmark. In respect of the guidance specific to the Waterloo Bridge views, the proposals would not maintain the visual prominence of the cathedral and would instead dominate it. The proposals therefore fail to comply with adopted policies in the Local Plan and London Plan which seek to protect these strategic views. The proposals further appear to directly contradict emerging policy which establishes that the gap and buildings stepping up from it should be maintained (para 11.6.11, City Plan 2040). In terms of the NPPF, harm to significance would be less than substantial and in the middle of this range. Harm to an asset of the highest significance attracts the greatest possible weight. We are not persuaded that the design has evolved to overcome this serious harm in a meaningful way and do not consider that could therefore represent good design as envisaged by the NPPF and NDG. The resolution of the cluster in this way would greatly diminish the townscape benefit of clustering tall buildings as a means of protecting London's historic environment, which is one of its core purposes.

	In the case of St James's Park and the Whitehall buildings in LVMF View 26A.1, the development would compete with the picturesque roofline of the highly significant listed buildings. Harm to their significance and that of the park would be less than substantial and low in the range, but would contribute to a higher level of cumulative harm with 55 Bishopsgate. The potential impact on St Ethelburga's requires further investigation as described above, in order to better understand potential adverse impacts. We do not consider that the proposals would deliver any heritage benefits. We note that increasing the permeability of the block and the reinstatement of historic routes through may be beneficial to the character of the City in principle. However, we do not consider that this would be achieved in a sympathetic way and could be achieved by a different development. Given the considerable disbenefit that the additional height these proposals would impart, we query whether retention and upgrade of a greater proportion of the existing building would be a more sensitive and sustainable way to redevelop the site. **Officer Response to comments:** These comments are addressed in the Design and Heritage and Strategic Views sections of this report.
GLAAS, Historic England Archaeology	I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of

	surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching conditions. **Officer response to comments:** Addressed in Archaeology section of this report and conditions recommended.
Greater London Authority	**Strategic issues summary** **Land use principles:** The proposed high density office development would support the function of the Central Activities Zone and London's position as a World City. Provision of a standalone pavilion for cultural and creative uses is also strongly supported subject to public access and affordable workspace being secured. **Urban design:** The City of London's Eastern Cluster is identified as a suitable location for tall buildings and the proposed building height falls within the relevant maximums for this site. The proposal represents high quality architecture and urban design. The ground level public realm would benefit from greater integration with adjacent developments. **Heritage:** Less than substantial harm at a low level is identified to heritage assets, through harm caused to their setting. The harm is to be weighed against the public benefits of the scheme at the Mayor's decision-making stage. **Transport:** The proposal would be considered acceptable subject to all the necessary highway and transport conditions and planning obligations being secured, including £1.29m towards improvements on Bishopsgate. Further work is required on the cycle parking quantum. **Energy and sustainable development:** The energy strategy, circular economy statement, and whole life carbon assessment require refinements. **Recommendation** That the City of London Corporation be advised that the application does not yet fully comply with the London Plan for the reasons set out in paragraph

	80. The applicant should address the outstanding matters addressed in this report. **<u>Officer response the comments:</u>** Issues raised have been addressed in the Transport and Sustainability sections of this report.
Transport for London – Spatial Planning	**INITIAL RESPONSE** **Access and parking** **Access:** The proposal will provide multiple pedestrian access points from Bishopsgate to the east and Wormwood Street to the north. It is proposed that pedestrians access the main building via one of the two main entrances on Wormwood Street. Those accessing the office floors above would then use escalators to travel to lift banks on the first and second floors. Through site connections are proposed to the west and south of the main building. It is welcomed access routes through the site would be opened, which would improve permeability of the site, the access right to members of public shall be secured by planning obligations. Cyclists access the long stay cycle parking at the first basement level primarily will be via the stair with gulley from Bishopsgate. Secondary access to the long stay cycle parking is provided via the two lifts within the cycle hub to the southwest of the site. In addition, tertiary access to the cycle store is also proposed via the vehicle ramp from Old Broad Street via the ramp and through the loading bay into the cycle store. The applicant has confirmed deliveries would not be permitted within the loading bay from 07:00-10:00, 12:00-14:00, and 16:00-19:00, minimizing risk of conflicts between cyclists and vehicles, which is welcomed. It is also supported that cycle lift and ramp access will be designed to be in line with London Cycle Design Standards, which is welcomed and be in line with London Plan Policy T5 Cycling. All of

	these should be secured by conditions/ obligation accordingly. **Cycle Parking** It is welcomed that the proposal includes 144 short-stay cycle parking spaces, in line with London Plan (2021) cycle parking standards and London Plan policy T5 Cycling, within the Cycle Hub at Level 1. This building would be accessed via the publicly accessible ground floors of the Cycle Hub, with a concierge service for parking visitors' cycles on the first and second floors. However, it is not acceptable that the proposed long-stay cycle parking provision of 1600 long-stay spaces would fall well short of the London Plan requirement of 2000 spaces. While the factor of site constraint is acknowledged, the applicant should make up the shortfall by reviewing the current proposed cycle parking arrangement following London Plan cycle parking standards. Since London Plan cycle parking standards are future proof, the phased approach of provision is not accepted. TfL requests that All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5 Cycling and London Plan cycle parking standards. **Car Parking** TfL welcomes that the proposal would be 'car free' except for provision of a blue badge parking space located at the first basement level. This space would be accessed via the vehicle ramp on Old Broad Street. The applicant shall clarify how further disabled provision can be made should there be an increased in demand in the future, in line with London Plan policy T6.5 Non-residential disabled persons parking. **Healthy Street & Vision Zero**

	An Active Travel Zone assessment (ATZ) has been undertaken and nine routes have been reviewed, in line with London Plan policy T2 Healthy Street. The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc. The Pedestrian Level of Services (PCL) study shows that Wormwood Street (south) adjacent to the site would become highly congested with Level of service (LOS) F if no improvement is delivered alongside of the proposal as less extent for Bishopsgate (west) of LOS C. TfL welcomes that several scenarios for improvement have been assessed which sees footway improvements would enable better level of service and accommodate future rise of footfall in the area, the City of London should therefore secure appropriate improvements by planning obligations accordingly. The improvement on Bishopsgate shall however be delivered with the applicant enters a s278 agreement with TfL for the following works: • Widening of the Bishopsgate eastern footway along the Site frontage. • Widening of the Bishopsgate western footway in line with the Site frontage In addition, TfL is developing a safety improvement proposal for the A10 Bishopsgate. A partial contribution of £1.29m is therefore sought from this proposal toward the project. This is considered reasonable as it is in line with that recently secured at the adjacent development at 55 Bishopsgate. <u>Legible London</u> TfL considers that new permeable routes between Bishopsgate and Wormwood Street will require carefully designed signage. A contribution of £35,000 towards new Legible London wayfinding on the public highway is therefore requested, payable to the City Corporation, in addition to any wayfinding, art and lighting requirements within the site. <u>Trip Generation & Mode Share</u>

	In line with London Plan Policy T4 Assessing and mitigating transport impacts, trip generation and mode share assessments have been undertaken in the TA. It is forecasted that the overall proposal is expected to generate a total of 4247 office two-way trips in the AM Peak (08:00-09:00) and 3923 two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 2530 two-way persons trips during the peaks compared with the existing use. This assessment is considered robust and acceptable. TfL accepts that the TA defines most trips related to the retail/ performance and exhibition spaces as likely to be linked trips; so that their trip generation impact would not be significant. The TA predicts most trips to/from the development will be by sustainable and active modes. Of those, 14% of trips will be by bike or on foot; 8.5% by bus, and 74% by London Underground (LU), rail, or DLR. The number of expected car and taxi trips is negligible. <u>Public transport service impact</u> TfL welcomed that a directional assessment on public transport services impact has been provided. Due to the many of LU, Bus, National Rail, and DLR services within walking distance of site, it is not expected that the proposal would have a significant impact on local public transport services. **London Cycle Hire** It is considered that the proposal would generate additional demand for local cycle hire services; to mitigate this TfL would generally seek a financial contribution toward provision of new cycle hire docking station in the City if feasible location has been identified for provision of new docking station. Failing this, a financial contribution toward enhancing level of service for existing cycle hire docking station may however be sought instead. Further advice would be given after further discussion on this matter with the Corporation of London. TfL will also seek compensation against the loss of revenue if the construction of the proposal leads to

	the temporary closure of the Wormwood Street Cycle hire docking station locating at the northern frontage of the application site. **Delivery & Servicing** In line with London Plan Policy T7 Deliveries, servicing and construction, a framework Delivery and Servicing Plan (DSP) has been provided which states that service access would be via the ramp off Old Broad Street, however the width of the ramp will be reduced to only allow one way operation. It also stated that servicing time would be restricted to outside peak hours to minimise traffic impact. TfL therefore requires that applicant to clarify measures to eliminate the risk of service vehicles queuing back onto the public highway and a put forward a back-up plan for the loading bays in the basement being out of use due to unforeseeable circumstances. Alternative arrangements should also be provided to facilitate quick delivery of small courier items. TfL also encourage the use of cycle servicing to minimise vehicle servicing and consolidated servicing should be included as part of the servicing strategy. The final submission of the DSP should be secured by pre-occupation planning condition/ obligation. **Construction Logistics** A Detailed Construction Logistics Plan (CLP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition in consultation with TfL. Special consideration should be given to ensure safety of vulnerable road users in the surrounding area and construction vehicle movements should be carefully planned and routed to avoid congested area and outside the peak hours. To minimise highway impact, construction vehicle holding area should be provided outside Central London to minimise un-wanted construction movements.

	Infrastructure Protection The site is near TfL/ LU tunnels/ infrastructure. The applicant would be required to seek Structural Approval from both TfL Roads and London Underground prior to commencement. Planning conditions concerning TfL/ LU assets/infrastructure protection should be secured accordingly. **Travel Planning** A framework Cycle Promotion Plan has been submitted which is welcomed. Considering previous comments regarding cycle parking provision being satisfactorily addressed, the finalized Plan should be secured by S106 planning obligation. **Community Infrastructure Levy** The MCIL2 rate for City of London is £80 per square metre. **Summary** The following matters should be resolved before the application can be considered in line with the transport policies of London Plan. 1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreements (S106/s278s) 2. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ. 3. Review of the proposed service access design and clarify measure to minimise risk of queue back by servicing vehicles and arrangements for express deliveries. 4. Secure the submission and approval of cycle parking details by condition. 5. Secure £1.29m (index linked) financial contribution toward TfL's A10 Bishopsgate Safety/ walking/ cycling improvement project.

	6. Secure £35,000 (index linked) financial contribution toward Legible London Way-finding improvement. 7. Secure contribution toward cycle hire improvement (either for new cycle hire docking station or service improvement to existing docking station). 8. Revise the DSP considering comments, and secure approval of both DSP and CLP by conditions, including TfL/ LU infrastructure protection. 9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail. **UPDATED RESPONSE** A meeting was held between the Applicant, CoL and TfL on 19 December 2024 to discuss the initial consultation response. Following that meeting, the Applicant has issued a meeting note that has been agreed by TfL, summarised as follows: 1. Bishopsgate Contribution: Originally, TfL requested a financial contribution of £1.29million towards the A10 Bishopsgate corridor improvement works, aimed at improving cyclist and pedestrian safety along the corridor. The contribution has been the subject of negotiation between the Applicant and TfL, who have agreed that a reasonable sum is £900,000, given that the Proposed Development would deliver public realm improvements around the Site that would improve pedestrian movement, alleviating pressure from the A10 and Wormwood Street. It is now proposed that 10-15% of this sum be paid on execution of the S106 agreement, with the remaining balance paid to TfL upon TfL tendering out for the construction works contract. 2. Cycle Hire: A contribution of £100,000 towards the extension of the nearby or another Cycle Hire docking station was agreed. If the nearby docking station (Wormwood Street) cannot be extended due to the London Wall Corridor Study works, the £100,000 contribution would be transferred to the A10 Bishopsgate works.

	3. Cycle parking: TfL originally raised concern with the proposed cycle parking provision not meeting the London Plan requirements. TfL have confirmed that given the provision of the public cycle hub, they are content with the proposals subject to contributions towards cycle hire (as above) and conditions regarding possible delivery of additional folding bike lockers within the Cycle Hub, explored through the detailed design stage. 4. Delivery and Servicing: The applicant has outlined responses to TfL's queries on avoiding queueing vehicles on the public highway if the servicing bay is occupied. Subject to a condition for a Parking Management Plan and obligation for a Delivery and Servicing Management Plan, TfL are now happy with the arrangements. 5. Car parking: TfL queried the potential for further disabled parking provision, in response to possible increased future demand. The applicant has agreed to explore opportunities for future on-street disabled parking on Old Broad Street (CoL Highway) alongside CoL's proposals to widen the western footway. 6. Legible London: A contribution of £35,000 towards Legible London wayfinding has been agreed. **Officer response to comments**: Addressed in the Transport and Highways section of this report, conditions are recommended and S106 Heads of Terms are proposed to be secured. Officers wish to note that the 'permanent' S278 with TfL is an either/or scenario – either the applicant pays the £900,000 contribution, or the works are undertaken via S278. This is subject to final agreement with TfL. There is still a need for a temporary S278 for the construction period as well.
Transport for London – London Underground Infrastructure Protection	Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that: • our right of support is not compromised;

	• the development will not have any detrimental effect on our structures either in the short or long term; • the design must be such that the loading imposed on our structures is not increased or removed; • we offer no right of support to the development or land. **<u>Officer response to comments</u>**: Conditions are recommended.
Crossrail Safeguarding	No comments.
Active Travel England	No comments.
Surveyor to the Fabric of St Paul's Cathedral	The Cathedral wishes to object to this planning application. We thank the project team for the heritage assessment concerning the Cathedral, circulated to us after the pre-application meeting. This pre-application assessment is evident within the final heritage assessment submitted. While the spirit of assessment was welcome, at pre-app we noted the need to see greater detail on the nuance of setting considerations. These should be more detailed and nuanced and go beyond either just LVMF views for wider appreciation, or the immediate setting of the cathedral as part of the St Paul's Cathedral Conservation Area for local views. Unfortunately, this heritage assessment has not been meaningfully developed for the formal submission, leading to a heritage baseline assessment that is substantially lacking in key areas. Therefore, we submit to the City that heritage impacts cannot be understood and weighed in the planning balance appropriately. In general, we do not consider the level of assessment provided is proportionate or satisfactory to inform the decision-makers fully and correctly. We understand the need for proportionality within the planning process, however paragraph 200 of the NPPF states that '*The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'* In this case, we do not consider the assessment provided

	is proportionate to the exceptional significance of the Grade I listed heritage asset which is impacted and does not allow a meaningful understanding of the specific heritage impacts of the proposals. **Understanding the Setting of St Paul's and its heritage significance** We submit and represent to the City that a fuller, more satisfactory and relevant evaluation of the heritage context is needed for this development. We proffer *'The Setting of St Paul's Cathedral its Contribution to Heritage Significance: An Analysis and Evidence Base (City Plan 2040 Regulation 19 Consultation version, June 2024)*' as a relevant basis for critical evaluation of this project. The 'Setting Study' was jointly commissioned by Chapter with Historic England. The mature draft of the Study includes detailed research and assessment, undertaken in-line with Historic England Guidance, most notably 'GPA3: The Setting of Heritage Assets'. Even in its present incomplete form, the report is of great use in understanding the contribution of the setting of the Cathedral to the heritage significance of the Grade I listed building, and how this significance can be appreciated. In turn, this assists the regulator with a greater (and appropriate) understanding of the potential heritage impact of development in the setting of St Paul's. **Impact to Local and Strategic Views** The proposals involve the construction of a new very tall, massive building on the edge of the Eastern Cluster. As such, the proposals will be appreciable in local views (As outlined in the City's *Protected Views* SPD) and strategic views as identified within the LVMF. Within these views the cluster appears to the right-hand side of the Cathedral. It has long been the aim of policy and guidance to ensure that the visual prominence of the Cathedral is maintained within these views, especially in relationship with the Cluster, which was intended by policy to have a central high point (around 1 Undershaft) and to diminish in height down to the context of St Paul's to the left and the River Thames to the right. The

	dominance of St Paul's was also to be preserved by establishing suitable 'stand-off' and space around the Cathedral. This policy approach is even broadly indicated within the application material (pg. 14 of the *Design and Access Statement*) which includes the diagram, noting that *The site is situated on the edge of the cluster and forms an important transition from the lower buildings to the north and the taller buildings of the cluster further south.* Given its form and location, this development does not therefore accord with that well understood and long-managed policy and urban design objective for the cluster. We therefore consider the proposal will harm key strategic and local views. The height and massing of the proposals will harm the character and composition of strategic and local views contrary to policy and guidance. We consider that the height and massing of the scheme will further add to the breadth and harmfully obtrusive presence of the Cluster in these views. In addition, the proposals will create an edge condition at this side of the Cluster, directly adjacent the Cathedral, will be a sheer drop off, rather than a sloped and considered 'designed form' comprised of multiple buildings of different massing. This will further harm identified views. This effect will also unacceptably erode the sky gap between the Cathedral and the Cluster, important to the character of key views, the ability to read the Cathedral and which is vital to both prominence and dominance of the edifice, which is a defining characteristic in and for the globally recognised City of London. All of these aspects will negatively affect an appreciation of the Cathedral as a Strategically Important Landmark. This is evident in strategic views, such as LVMF views 15B.1 and 15B.2. Here, guidance states that the proposals should *'seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site.'* We consider that this proposal is materially at odds with this guidance, which is not satisfactorily assessed within the applicants HTVIA, which for 15B.1 notes '*the projecting principal cores and slope of the western edge would articulate a subtle step down within the City Cluster, from 22 Bishopsgate to*

	Angel Court beyond its edge.' We fundamentally disagree with this erroneous characterisation by the applicant's heritage, townscape, and VIA assessors. We do not consider the step-down depicted subtle, successful, or appropriate for the site. As noted above, we consider the scheme will not complement the cluster in this regard and thus is impactful to St Paul's as an SIL. The assessment submitted by the applicant is so deficient, we suggest, that the regulator should either undertake their own new assessment, or commission a more properly objective and professional evaluation (see below for more on this concern). In addition, guidance states that the character of a view should be preserved if proposals draw the cluster closer to the cathedral, which also evidently is not achieved. Furthermore, we do not consider the cathedral's relationship with its clear sky background has been preserved as required by guidance. Guidance also states that proposals '*should not dominate the dome or western towers,'* and that '*Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect.'* Evidently this is not achieved by the proposals. For the reasons outlined above, we consider that the scheme would unduly dominate the dome when understood cumulatively with the rest of the consented cluster, contrary to the wording of guidance. Ultimately, we do not consider that the proposals would accord with the LVMF guidance to positively '*show how they contribute to the spaces and buildings immediately fronting the river, including the strategically important landmark of St Paul's Cathedral*'. This is most evident in LVMF views 15B.1 and 15B.2 as outlined above. The aggressive massing of the proposals and their negative effect on the balance between the cluster and the cathedral, important to the character and appearance of strategic views, would also be appreciable in views 17B.1 and 17B.2 from Hungerford bridge and 16B.2 from Gabriels Wharf, which are also harmed.

	We also consider these issues affect those views of the Cathedral identified within the City's *Protected Views SPD* (2012). Here, the *Backdrop and Skyline Setting of the Cathedral* section is relevant. We consider that the proposals are contrary to guidance that states proposals should not worsen the already detrimental effect of development that *'crowd(s) close to the Cathedral on the skyline.*' Crucially, the guidance states that: *'There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and so should be maintained.'* We consider that the proposals do not adhere to this guidance on strategic and other local views. We therefore do not consider that the proposals satisfactory comply with adopted policy within the City's *Local Plan* (January 2015), specifically policies CS13 Protected Views, Policy CS14 Tall Buildings or Policy CS7: Eastern Cluster. We also do not see how the proposals comply with the relevant policies within the London Plan. **Heritage Impact** We consider that the proposals will cause significant harm to the heritage significance of the Grade I listed building, and how this significance is appreciated. This harm will arise through alteration of and detriment to the Cathedral's setting, linked to the visual impact described above. The contribution of the setting of the Cathedral to its heritage significance is described and understood within the Setting Study, as noted above. This is related to, but goes beyond, impact to views (see para 1.9 of the Setting Study). Of particular relevance to this impact is the 'clear sky space' factor of the setting of the Cathedral, and how this contributes to significance. Also of relevance is 'the river corridor' wherein the proposals would be most appreciable and

	impactful. Both are assessed within the *Setting Study.* In terms of heritage significance, the visual prominence of the Cathedral is indicative of its multifaceted historic interest. St Paul's was designed as a spiritual, cultural, civic and architectural focal point of the City. Its height, massing, and form, rising above wider London, has historically encapsulated these elements of its significance. It also allows for an understanding of the building's relationship with the topography of London, and the historic reason why such an important place of worship would have been constructed on Ludgate Hill. In addition, its visual prominence and location against clear sky has historically contributed to and allowed for an appreciation of its architectural interest, from the baroque detailing of the western towers to the poignant and striking form of the dome. The Cathedral is the most prominent historic structure in the City of London. Policies for the City cluster of tall buildings were intended to maintain the dominance of the Cathedral within the City skyline. Key to these two characteristics (prominence and dominance)- both today and over 25 years of design management of the cluster - is the sky gap between the cluster and the Cathedral and thus also the form of the cluster (see p.108 of the Setting Study, which discusses the curated nature of the cluster, and that *'maintaining sky space with the Cathedral sustains the visual prominence of the dome.'*). We consider that a correctly informed heritage assessment, based on a methodology centred in published Guidance and evaluated in line with the baseline of the *Setting Study,* would conclude that there is significant heritage harm caused by this proposal. This harm arises, in-part, through the erosion of clear sky space around the Cathedral, which contributes to the significance of St Paul's and the way this significance is appreciated as outlined in the *Setting Study* (see, for instance, pp. 22-23, and in particular paragraph 6.5 of the *Study*). The proposals would therefore also detrimentally affect the sky gap – the clear sky distance between the

	cathedral and the cluster – causing harm. Harm also arises through increasing the height, massing and physical presence of the cluster relative to St Paul's, and through creating an obtrusive hard cliff-edge to the cluster close to the Cathedral. The proposed extended and hard-edged cluster, enabled by an eroded sky gap, would detrimentally alter the way in which the historic pre-eminence of the Cathedral, signified through its scale and size in comparison to its setting, is appreciated. This contribution to the significance of the Cathedral would be disrupted by the massing of the cluster, which would alter the 'centre of gravity' for the views of the Cathedral, leading to it to be further challenged and dwarfed by the cluster, thus diminishing its dominance and affect its features of architectural interest, the dome and the towers, and how they are appreciated. This is evident in strategic views (such as 15B.1, above) and would affect an appreciation of the significance of the building from the river corridor, as described in the *Setting Study*. This heritage harm is not limited to strategic views. Local views not identified elsewhere (such as the view from Somerset House) also illustrate this heritage harm. We comprehend the screening effect of trees in this location – though would seek to note that the management of trees along the embankment and elsewhere is a long-held aspiration of the Cathedral. **Meeting the evidence and evaluation requirements of the NPPF** As we note above, there is a duty under the NPPF paragraph 200 for the regulator to be informed by a sufficient and satisfactory assessment of significance, provided by the applicant. We invite the planning team to consider that these matters are not addressed thoroughly, objectively or meaningfully in the Heritage Appraisal by the applicant. We suggest that the planning team should either require the applicant to resubmit this unsatisfactory appraisal, or the City should commission their own expert opinion – which we suggest could use the Setting Study as a more satisfactory baseline for understanding the heritage significance of the Cathedral and its context.

	As NPPF 201 states *'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal' which should take into account 'the available evidence and any necessary expertise'*. We suggest the Setting Study could be used in this regard. We particularly note the role the planning authority has with regards to paragraph 203 of the NPPF, to have regard to '*the desirability of sustaining and enhancing the significance of heritage assets'* and '*the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality*' and '*the desirability of new development making a positive contribution to local character and distinctiveness'*. We suggest that the materials submitted by the applicant in support of their proposed development are unsatisfactory and that the City should much more closely scrutinise the baseline significance, the objective evidence of impacts and the proper consideration of care and stewardship for heritage assets. We submit that, performed correctly, the only conclusion can be that this application, which runs counter to policy, should be refused. **Discussion of Design Development & Attempts to Avoid, Minimise, and Mitigate Impacts** The pre-application presentation from the applicants and associated information described, in part, how the architectural proposals have been adapted to the site to limit visual impact and heritage harm. This design methodology is also outlined within the submission material. Our understanding is that the 'chamfered edge' of the proposals, coupled with the materiality and massing, is intended to reduce the overall massing and presence of the proposals in key views. We submit that, whilst selection of materials and the cut-away wintergardens of the design as proposed may in some way soften the visual harm and impact in certain conditions, it is impossible to fully or adequately mitigate the harmful reality of a building

	of this height and massing as proposed, in such close proximity to the sky space around the dome. The visual and heritage impact will remain and will be significant. We suggest that the design will inevitably be more dominant and harmful, as it appears in certain changing conditions i.e. light levels, sun glare and weather – however expensive and well detailed the cladding package will be. We reviewed the additional design development information shared with the Cathedral in March 2024 which is broadly echoed within the submission material. The initial options modelled at first sight appear extensive. We understand that the 'modelling profiles' explored in the massing studies, despite having been requested to lessen visual impact, have clearly not achieved this aim: we question whether really there was any sincere motivation to do so, as there was no meaningful or evident consideration of reduction in the quantum of development. In fact, the massing studies appear to show that the development brief requires a pre-determined development area and value – and the massing studies are playing architecturally within a fixed metric. There is no thorough analysis of any scheme that markedly reduces the bulk, height and heritage impact of the building, informed and led by a conservation-management approach. The options therefore do not illustrate how the clearly harmful impacts could be entirely designed out. There are aspects of the *Design and Access Statement* that speak to options other than full redevelopment (see pp. 39-41). We cannot discern the exact reasoning behind the eventual, most intrusive and harmful, option chosen. We submit therefore that the options appraisal is unsatisfactory from a heritage perspective and therefore not in accordance with NPPF 206 that any harm should require clear and convincing justification. If there is no attempt to design out harm due to viability judgments, this brings us back to the necessary conclusion that this is the wrong building on the wrong site. 99 Bishopsgate is the wrong site for a tall building at all given its prominent 'edge condition' in the cluster. If the site has been bought at too high a cost, this temporal and material error

	should not be an excuse or rationale for irreparably harming the setting of the Cathedral and how this public good is enjoyed and appreciated by all, forever. Historic England guidance, the British Standards in relation to heritage conservation, and crucially the policy drivers NPPF, PPG, London and indeed City Policy & Guidance related to heritage conservation, all seek to see heritage harm avoided, mitigated, and minimised. Furthermore, this is linked to the clear and convincing justification for such impacts required by the NPPF. Unfortunately, we do not consider that this has adequately been borne out within the development of the scheme and is inherent to the principle of a tall building in this location. We also notice, and mention cannot be avoided here, that it appears that emerging policy has enabled, rather than critically appraised, this oversized and harmful development proposal within the approach to the City Plan Tall Buildings contours policy – which suggests to us at least some form of predetermination of an approval being granted for this project. We have written separately to raise this as a concern and expand further on this issue below. **Relationship with the Emerging City Plan 2040** As outlined within our Regulation 19 response to the planning policy, the Cathedral has articulated concerns regarding the soundness of the plan in relation to tall buildings, heritage, and key views. This is a concern which is also echoed by Historic England, HMG's statutory advisors on heritage matters. Despite making representations as early as 12th December 2023 on the emerging contour map (and associated 'jelly mould') policy definition, the current draft of the City Plan, unfortunately, retains the most problematic and harmful issues in this regard. As we phrased it in our representations, the 2040 Plan policies 'bakes-in' harm to the setting and heritage of the Cathedral, which we find incomprehensible as much as it should be found – in its present form, on examination, to be unsound. As such, whilst the spirit of many such policies

	within the *City Plan 2040* is laudable, we consider that their weight is limited in relation to this application. NPPF 48 notes that the weight given to emerging plans is based upon, in part, the extent to which there are unresolved objections and the degree of consistency between the emerging plan and the NPPF. As noted above, there remain real concerns with the plan in numerous ways, in part related to its compliance with the NPPF. Therefore, even though the City Plan 2040 Tall buildings policy and contour map evidently has sought to enable this type of development in this location. Our feeling remains that this facilitation is inappropriate and without due regard to wider policy nor process, in our view. As observed above we also have articulated concerns over the relationship between the proposed development and the emerging policies governing development within the City as part of the *City Plan 2040*. We understand from our meeting that the scheme has directly influenced the parameters of the planning assessment. We continue to feel that this is at best ill-advised and was not soundly grounded in an assessment of heritage impacts. We have previously raised a concern in relation to process directly with the City of London. We also made clear within our representation on the *City Plan 2040* that there could be a perceived conflict of interest with regard to the assessment underpinning the Tall Buildings policy (prepared by the Townscape Consultancy) who are here acting on behalf of this applicant. We would still welcome further information as to how such processes interrelate and to what extent this project team has interfaced with emerging policy. As noted, in our view as yet there has been no properly or fully consulted planning policy development which would correctly establish this proposal within the bounds of an acceptable shift in the envelope of the cluster, which will be so objectively and unnecessarily harmful. **Conclusions**

	The Cathedral wishes to **object** to the scheme. We cite above our concerns over unacceptable levels of heritage harm to the Grade I listed Cathedral, impact to the character and composition of key views, and harm to the ability to appreciate the Cathedral as Strategically Important Landmark. This harm – which is avoidable in our view but appears to have been enabled by the formulation of questionable emerging policy for this site - occurs principally due to proposed overdevelopment to the edge of the cluster. For decades, the policy objective has been to allow for both the form of the Cathedral to be appreciated and there to be 'breathing space' between St Paul's and the Cluster, preserving both prominence and historic dominance of St Paul's in the City landscape. This has long defined the overall massing and form of the cluster in relation to the Cathedral. This policy aim also forms the central premise around view management policy and guidance. We have seen the cluster grow ever taller and it is now spreading ever wider in recent years. The recent consent of 55 Bishopsgate is an example of this trend in action; a project on which Chapter also raised major concerns, but which was nevertheless approved. We have always supported and can be excited about the contrast between the modern City and the heritage of St Paul's when this juxtaposition is in a right balance. Our comments relating to 55 Bishopsgate were clearly indicating a marked discomfort with a harmful and encroaching design at the edge of the Cluster. At the time we were critical of what we felt was its excessive height and massing given its location in the cluster, and what it does to the 'gravity' and centrality of the cluster as perceived in views such as 15B.1. That scheme will harmfully draw the eye inexorably away from the Cathedral and cause adverse visual and heritage impact. This multifaceted harm is consolidated, exacerbated and entrenched through the proposed building to 99 Bishopsgate. We therefore feel, with regret, that there is no alternative but to object. We have also indicated with these representations

	a number of matters of concern over process and evaluation methods, which we submit should inform the decision-makers. We will be glad to further discuss these issues, if given the opportunity. We hope that this is a letter of comment that strengthens meaningful dialogue concerning the future of the development site in relation to St Paul's Cathedral. **Officer response to comments:** A thorough assessment of the points raised and consideration of the impacts identified in the response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views and Planning Balance. **Applicant response to comments:** The applicant has provided a response to the comments raised by the Surveyor to the Fabric of St Paul's Cathedral and Historic England, summarised as follows: We have conducted a thorough and proportionate assessment of the significance of the Cathedral…[including reviewing] hundreds of local and strategic views both in person and with the aid of digital models, prior to conducting a thorough analysis and assessment of 61 Accurate Visual Representations of the completed Proposed Development. We recognise harm as a result of the visual proximity of the Proposed Development to the Cathedral but consider that the Proposed Development would nonetheless make a positive contribution to the skyline at the boundary of the City Cluster in views from the River Thames. This positive contribution is largely as a result of the existing edge condition of the north-western boundary of the City Cluster, the perception of greater uniformity and scale, and a carefully designed western edge to the Proposed Development. Together, these effects would partially mitigate harmful effects of visual proximity and the differences in our assessments appear to stem from our analysis of views and reading of the LVMF and its Visual Management Guidance, rather than any suggested conflicting interpretation or misunderstanding of the significance of the Cathedral. We also recognise, and as clearly stated

	in the HTVIA, that the contribution of setting to the significance of St Paul's Cathedral is not simply tied to strategic views set out in the LVMF. A more expansive analysis of setting would however be disproportionate to the assessment of heritage effects of the Proposed Development, which are most strongly linked to views from the River Thames. The Proposed Development adheres to local, regional, and national policies. It has been designed to mitigate adverse effects with particular emphasis on heritage assets of greatest significance. The significance of St Paul's Cathedral will be largely preserved, with a minor impact to its setting when viewed from the northern side of the River Thames. The nature of these views will be preserved and the design will improve the character of the City Cluster, rationalising the existing situation and providing a clear and high-quality edge to its north-western boundary. Impacts to the Cathedral are largely balanced, with a low level of less than substantial harm resulting from the visual proximity of the Proposed Development, with its dominance within London preserved and views towards its dome from the River Thames enhanced. The full response can be read online.
Metropolitan Public Gardens Association	The MPGA is a long-established charity, founded in 1882, which has been involved in the London gardening world for over a century. It was set up to meet the need for public open spaces, including churchyards and burial grounds, as the urban population expanded. We keep a close eye on planning applications, the Green Belt and any parks and gardens under threat. It is therefore with great concern that we hear from our sister organisation St Ethelburga's Peace Garden of the likely exacerbation of wind tunnel effect and significant loss of light on its projects and facilities if re-construction of the tower at 99 Bishopsgate (adding an extra 100m in height) goes ahead. We note from the MDF-based Radiance Report (document 24_00836_FULEIA-RADIANCEBASED_MDF_REPORT-1556512.pdf) that consultants were not even asked to assess the impact of loss of light on St Ethelburga's. Perhaps that is because it is not a residential building and

	there is no methodology for assessing impact on this kind of facility that supports projects for peace and reconciliation. We also understand from St Ethelburga's that until a few weeks ago the planners were completely unaware that there is already wind tunnel effect, and that 'turbulence' has had a negative effect on the Grade 1-listed building, which dates back to 1411 and survived both the Great Fire of 1666 and the IRA bomb of 1993. We very much hope and would urge that the GLA uses its powers to delay proceedings until a proper right to light assessment on the impact of the development on St Ethelburga's has been undertaken, and that sufficient time is granted for appropriate mitigation of all the negative effects (including wind and the several-years disruption of the construction phase) to be put in place. As a general point we would urge the planners to consider the negative impact of yet another skyscraper (99 Bishopsgate would become the City's fifth tallest) on all workers and residents and faith communities in Shoreditch. In this part of the City only a handful of precious public open spaces such as St Ethelburga's Peace Garden remain. We must protect the few we have left. **Officer response to comments:** A thorough assessment of the points raised and consideration of the impacts identified in the Wind, Thermal Comfort, and Daylight and Sunlight section of the report.
Thames Water	**Waste Comments** The proposed development is located within 15 metres of a strategic sewer. 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.' We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.

	Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. 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 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. Thames Water is currently working with the developer of application 24/00836/FULEIA to identify and deliver the offsite COMBINED WASTE WATER infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the combined waste water network to serve 17,800 sqm of office space but beyond that, upgrades to the combined waste water network will be required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development

	doesn't outpace the delivery of essential infrastructure. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. **Water Comments** Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that appropriate conditions and informatives be added to any planning permission. **Officer response to comments:** Conditions and informatives are recommended**.**
Environment Agency	**Water Resources** Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures in all developments, particularly in those that are new. 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 all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

	Commercial/Industrial developments: We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority. **Officer response to comments:** Noted. Relevant informatives attached.
Natural England	No objection.
Health and Safety Executive	No comments as the planning application does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.
London City Airport	Conditions recommended relating to Radar Mitigation Scheme, cranes, obstacle lights, Instrument Flight Procedures Impact and Construction Methodology. **Officer response to comments:** Conditions recommended. An updated response was sent regarding the IFP condition which has been reflected in the schedule.
Heathrow Airport	Conditions requested related to H10 Radar Mitigation and submission of a Construction Management Strategy. **Officer response to comments:** Conditions recommended.
National Air Traffic Services (NATS)	NATS has assessed the application and has identified the significant potential for an impact on its operations. Specifically, the proposed development is of a significant scale and massing, as well as being offset from the bulk of the City Cluster. As such, the line of sight from the development to the H10 radar, operated by NATS but located at Heathrow airport is unobstructed above 120m. NATS therefore anticipates the top half of the building to be sufficiently illuminated by the radar to reflect radar signals and cause false aircraft targets to appear on air traffic controllers' displays. This has an unacceptable impact on ATC workload. The potential impact can be affected by

	the design of the building (finish, massing/scale, orientation) or in the worst case can be mitigated by modifying the radar system. As such, NATS is satisfied that subject to a commercial agreement with the applicant in respect of timescales and funding, mitigation measures are available. Accordingly, should the LPA be minded to grant planning permission to the development, NATS respectfully requests that the planning conditions overleaf are imposed on any consent. **Officer response to comments**: Conditions recommended.
City of Westminster	No comment.
London Borough of Hammersmith and Fulham	No comments received.
Haringey Council	No objection.
London Borough of Lambeth	No comment.
London Borough of Southwark	No comments.
London Borough of Camden	No objection.
Royal Borough of Kensington and Chelsea	No objection.
London Borough of Richmond Upon Thames	No objection.
London Borough of Tower Hamlets	With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. While 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, associated listed buildings and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given in the Heritage, Townscape and Visual Impact Assessment (HTVIA) of the Environmental Statement (ES). The ES concludes that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Traffic and Transport, and Climate Change. The following aspects and matters that could affect LBTH will result in significant adverse effects,

	however, none of the affected receptors are located within LBTH: Noise and Vibration, Daylight, Sunlight, Overshadowing and Light Pollution, and Wind Microclimate. The HTVIA concludes a major significant adverse effect on View 6: Aldgate Square within LBTH during construction. Two cumulative schemes in LBTH have been considered in the cumulative assessment, however there are additional schemes in LBTH which should be considered as follows: • 1-10 Bishops Square (One Spitalfields) (PA/24/01198). Planning application submitted. • Royal Mint Court (PA/24/01229). Planning application submitted. • 101 Whitechapel (PA/24/00173). Planning application submitted. • Trumans Brewery (PA/24/01451, PA/24/01475, PA/24/01439, PA/24/01450). Planning applications submitted. • Ensign Street (PA/13/03068); Planning permission granted. • London Dock (PA/19/00764 – noting the latest s73 application granted for the site, previous permission including PA/17/02112 and PA/14/02819, original hybrid permission PA/13/01276) and the associated reversed matters applications (Plot D – PA/18/00331; Plot E – PA/19/00766; Plot F – PA/19/01684; Plot G – PA/21/00716 & PA/22/02666); Planning permission granted. • London Dock Blocks H & J (PA/23/02079); Resolution to grant planning permission. • Bishopsgate Goodsyard (LBTH Reference PA14/02011; London Borough of Hackney Reference; Greater London Authority Reference: 2014/2425); Planning permission granted. • Land bounded by Elder Street, Folgate Street, Blossom Street, Norton Folgate, Shoreditch High Street and Commercial Street (PA/14/03548) (PA/14/03618) (PA/19/00773); Planning permission granted. • Enterprise House, 21 Buckle Street

	(PA/16/03552); Planning permission granted at appeal. • 55-56 Chamber Street (PA/19/02837); Planning permission granted. • 34-40 White Church Lane and 29-31 Commercial Road (PA/15/02527, PA/21/02666). Planning permission granted. (PA/24/00644); Planning application submitted. A HTVIA has been provided within Volume 2 of the ES. The townscape assessment has considered the effects on Spitalfields Townscape Character Area within LBTH and has concluded a minor neutral effect. The following views within LBTH, or relevant to the assessment of effects on the Tower of London have been identified and considered in the assessment: • View 5: Commercial Road – Minor Neutral Effect during construction and operation. • View 7: Butler's Wharf (not within LBTH) – Minor Neutral Effect during construction and operation. • View 8: LVMF 25A.3 Queen's Walk (not within LBTH) – Minor Neutral Effect during construction and operation. • View 9: LVMF 10A.1 Tower Bridge – Minor Neutral Effect during construction and operation. • View 10: Tower Bridge Approach – Minor Neutral Effect during construction and operation. • View 11: Tower of London, South Wall – Minor Neutral Effect during construction and operation. • View 12: Tower of London, Inner Ward – Minor Neutral Effect during construction and operation. • View 13: Tower of London, Inner Curtain Wall, east of Deveraux Tower – Negligible Neutral Effect during construction and operation. LBTH has noted that the Non-Technical Summary (NTS) inconsistently reports the significant effect on View 6: Aldgate Square during construction, whilst this is correctly reported in paragraph 161 of the NTS, it is not stated in Table 8. In addition, Table 8 and Paragraph 165 of the NTS, reports that during operation View 6: Aldgate Square would experience a moderate beneficial significant effect,

	which is incorrect. The NTS must be updated in this regard. Additional model views have been rendered and provided as Appendix 1 of the HTVIA, and the following views are located within LBTH, or relevant to the assessment of effects on the Tower of London: • View 1: Ali Altab Park • View 2: Wentworth Street • View 4: LVMF 25A.1 Queen's Walk (not within LBTH) • View 5: LVMF 25A.2 Queen's Walk (not within LBTH) • View 6: Tower Hill Scaffold With the exception of View 6, it is considered that the other views should have been fully assessed within the ES given the visibility of the Proposed Development in these views. The Zone of Theoretical Visibility (ZTV) provided as Appendix 3 of the HTVIA demonstrate that the Proposed Development would likely to be visible across a wider area of LBTH than is represented by the view point assessed, particularly within Allen Gardens. It is not clear from the ZTV whether the Proposed Development would be visible from LBTH Borough Designated View 2 View from Wapping Wall bridge to St Paul's Church (as shown on Figure 6 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020). The date the photo of each view was taken cannot be located in the HTVIA. This should be provided to ensure the baseline is reasonably up to date and can be relied upon. The TBHVIA assesses the likely significant effects of the Proposed Development on above-ground heritage assets. The following heritage assets within LBTH have been assessed: • Tower of London World Heritage Site (WHS) and associated designations – Minor neutral effect during construction and operation. • Christ Church – Negligible neutral during construction and operation.

	It should be noted that the assessments within the THVIA are subjective. The 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. The City of London Corporation must consider whether the ES is considered to be adequate 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 Regulations. **Officer response to comments:** Officers have provided an assessment of the design evolution, including alternative options, within the Principal and Impacts of a Tall Building and Design Scrutiny sections of the report. With regards to the additional schemes highlighted by the LBTH that should have been taken into consideration within the HTVIA, Officers consider that the HTVIA does successfully assess the scheme. A response has been provided by the applicant giving reasons for the exclusion of schemes and is included within the appendices of this report. Officers and the applicant do acknowledge a tabulation error in the construction effects table for View 6, where *Medium* sensitivity and *Very Small* magnitude of change should result in *Negligible to Minor and not Significant* rather than a *Major and Significant*. Residual effects on this view are consistent in the HTVIA. This should read Minor Neutral, Not Significant rather than Major Adverse and Significant. Nonetheless, Officers have conducted their own assessment of the townscape impacts which is set out within the Heritage section of this report. The views provided within the HTVIA were agreed with the applicants prior to submission. Officers are satisfied with the views provided, and a full assessment has been undertaken on the views

	highlighted within the heritage section of the report, including impacts on the Wentworth Street and Whitechapel High Street Conservation Areas. Impacts on the Tower Hamlets local views, including View No.2 (Wapping Wall bridge to St Paul's Church), have been assessed within the Borough Views section of the report. With regard to the impact on Allen Gardens, the proposed development would sit as part of the established cluster within views from this park. Dates of the photographs of the HTVIA Views have been provided by the applicant, and Officers are satisfied with that an accurate assessment has been undertaken.
City of London Strategic Infrastructure	No comments.
City of London Police – Design Out Crime Officer	Whilst I have no objection to the build/refurb, I have raised concerns over the public/private walkway between Wormwood Street and Bishopsgate. The building integrates the cycle storage facilities into the back area of the building and have allocated space for them over several floors. My concern is that this area is likely to become a through route for cyclists avoiding the busy junction of Bishopsgate, also the location of the storage access is along the back corridor. I have recommended that some of this area should be stepped to minimise this, subject to appropriate DDA access. We have discussed controlling access to the building during spontaneous protest/attack and they have placed mitigation into the design for this. **Officer response to comments:** Addressed in the Security section of this report, and should be noted that the new public route would be step-free to create a more inclusive and accessible space.
Air Quality	Comments raised in relation to the submitted Environmental Statement in terms of generator usage, Modelling Methodology, Air Quality Positive, and Air Quality Positive Statement. **Officer response to comments:**

	Air Quality Positive addendum submitted and addressed in Air Quality section of this report.
District Surveyor (Fire)	Comments raised in relation to the proposed dual entry lift and goods lift. Proposed interlocking stair would be acceptable and further detail of the dual entry lift would be provided through detailed design and approved at Building Regulations stage.
Environmental Health	Conditions requested and recommended relating to Demolition Management Plan, Construction Management Plan, Sewer Vents, Noise and vibration from plant, Odour, Servicing hours, Roof terrace - hours and management, Contaminated Land, Noise insulation, Lighting Strategy. Informatives are recommended. **Officer response to comments:** Conditions recommended.
Lead Local Flood Authority	Conditions required on the details of SuDs and their maintenance. **Officer response to comments:** Conditions recommended.
Environmental Resilience	Proposal is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.

Objections and Neutral letters

Comment	Officer Response
Impacts to St Ethelburga's Centre of Reconciliation and Peace including church and garden	
Loss of natural light to the Church due to increased height of the proposed development	Addressed in the Design and Heritage and Daylight and Sunlight sections of this report.
Noise, vibration, dust and general disturbance to the Church and	Conditions are recommended relating to the submission of a Demolition

Church events, activities during demolition and construction	Management Plan and Construction Management Plan. Addressed in the Noise and Vibration sections of this report.
Loss of revenue for the Church as a charity due to reliance on venue hire	Loss of revenue for a business is not a material planning consideration.
Increased adverse impacts to wind tunnel effects around the Church	Addressed in the Wind Microclimate section of this report. Overall, the wind conditions would see a minor beneficial impact as a result of the proposed development, and the wind conditions in and around the church and peace garden would remain suitable for their intended uses.
Less wildlife	This comment is brief and lacks evidence to support the claim to allow Officers to respond. The proposals would have a beneficial impact on local biodiversity and urban greening.
Impact to the historic fabric and setting of this Grade I listed building	Addressed in the Design and Heritage sections of this report.
The developers should provide compensation to the Church during demolition and construction to ensure it can still function during this time	This is a civil matter and is not a material planning consideration.
Transport, including part closure of Bishopsgate, loss of parking, traffic congestion	Addressed in the Transport section of this report.
Loss of light to surrounding properties	Addressed in the Daylight and Sunlight section of this report. The objection from The Wardens and Society of the Mistery or Art of the Leathersellers with regards loss of light to

	33 Great St Helen's is noted and covered in detail in the report, however Officers do acknowledge that there would be a moderate adverse (significant) impact to this property in the cumulative scenario only, primarily as a result of the 55 Bishopsgate development as opposed to 99 Bishopsgate. As discussed in the report, on balance Officers consider the impact acceptable.
Increased noise and disruptions to the amenity of the local area and residents	Addressed in the Noise and Vibration sections of this report. Conditions recommended relating to Demolition Management Plan, Construction Management Plan, Noise and vibration from plant, Odour, Servicing hours, Roof terrace hours and management, and noise insulation.
Post pandemic, the City needs to diversify toward more leisure, touristic, leisure and heritage usage.	Noted. The land uses proposed are discussed in the Land Use section of this report, and the need for office floorspace is discussed in the Economic Issues and Principles of Development section of this report.
Ecology and biodiversity, including impact on existing Ginkgo tree	Noted. These issues are covered in the Sustainability section of this report. The existing ginkgo tree is to be retained and protected throughout construction, with a condition recommended to ensure appropriate tree guarding.
Daylight, Sunlight and Overshadowing effects to surrounding churches	
Reduction in daylight amenity to St Botolph (minor to moderate adverse)	Addressed in the Daylight and Sunlight section of this report.
Minor adverse effect to overshadowing of the garden at St Botolph	Addressed in the Daylight and Sunlight section of this report.
Negligible effect on sunlight to St Ethelburga's and All Hallows	Addressed in the Daylight and Sunlight section of this report.

Heritage impact on surrounding churches	
During construction - St Ethelburga's: There will be a "moderate, adverse, significant" impact on the church and a "negligible, neutral, not significant" impact on the St Helen's Place Conservation Area that the church is located within. In terms of permanent impacts - St Ethelburga's: The report considers that there will be a "Moderate Beneficial (Significant) in nature." impact on the church that the "The cumulative effect would be Negligible Neutral (not Significant) in nature" on the St Helen's Place Conservation Area that the church is located within.	Whilst it is acknowledged that the comments made in relation to the permanent impacts made by the applicant are not agreed to by the objectors, the overall heritage impacts are addressed in the Design and Heritage section of the report.
During construction - St Botolph: There will be a "moderate, adverse, significant" impact on the church. With regards to the Bishopsgate Conservation Area, that the church is located within the report concludes that there is a "moderate, adverse, significant" effect. In terms of permanent impacts - St Botolph: The report considers that there will be a "Moderate Neutral (Significant)" impact on the church. With regards to the Bishopsgate Conservation Area, that the church is located within the report concludes that the "The Proposed Development would result in a	Whilst it is acknowledged that the comments made in relation to the permanent impacts made by the applicant are not agreed to by the objectors, the overall heritage impacts are addressed in the Design and Heritage section of this report.

medium magnitude of change to the Conservation Area" and goes on to suggest the significance of the effect would be "Moderate Beneficial (Significant)". The report also considers the other heritage assets associated with the church, including the church hall, church yard, drinking fountains and parish memorial which are each individually designated as Grade II heritage assets and concludes that the impact will be "Negligible Neutral (not Significant) in nature"	
During construction - All Hallows: There will be a "moderate, adverse, significant" on the church and "minor, neutral, not significant" impact on the Conservation Area that the church is located within. In terms of permanent impacts - All Hallows – The report considers that there will be a "Moderate Neutral (Significant)" impact on the church and that "The cumulative effect would be Minor Neutral (not Significant)" on the New Broad Street Conservation Area that the church is located within.	Whilst it is acknowledged that the comments made in relation to the permanent impacts made by the applicant are not agreed to by the objectors, the overall heritage impacts are addressed in the Design and Heritage section of this report.
Noise and Vibration during demolition and construction to surrounding churches, including St Ethelburga's and All Hallows	Discussed in the Noise and Vibration sections of this report. Conditions are recommended relating to the submission of a Demolition Management Plan and Construction Management Plan.

The area is too densely developed with high rise office buildings and would impact on overloaded utilities	The need for further office space within the City is addressed within the Economic Issues and Principle of Development, and Land Use sections of this report. In terms of the impact on overloaded utilities, the City's Strategic Infrastructure Officer raised no objection to the proposal.
Financial impact on surrounding businesses	Financial implications on the operation of surrounding businesses are not a material planning consideration.
Plant noise associated with the completed development	Addressed in the Noise and Vibration sections of this report. Conditions recommended relating to noise and vibration from plant.
Mitigation of demolition and construction impacts to surrounding properties	Conditions recommended relating to the submission of Demolition and Construction Logistics Plans and a Construction Environmental Management Plan/Scheme of Protective Works.
Request for wider context drawings to ascertain separation distance between the proposal and 33 Old Broad Street	The applicant is engaging directly with the leaseholders of this property and discussions are ongoing. Officers are content via site visits and the submitted information that the proposals would not have an undue impact to the neighbouring property by way of loss of light or an increased sense of enclosure.

74. Neutral letters of representation and letters of support have been received from the EC Bid, Intermission Youth, and the Deputy Mayor for Culture and Creative Industries, Justine Simons OBE. They are summarised as follows:

- EC BID (neutral) – Supportive of the significant development pipeline and projected growth in the area; welcome a number of provisions in the application that align with the Public Realm Vision, specifically the extensive opening up of the public realm, new routes for pedestrians providing enhanced connectivity, animation through the introduction of new city market, dedicated multi-use cultural facility with ground floor activation, and providing extensive green space for commuters and visitors.

- Intermission Youth (support) – Intermission Youth's interest is to further the discussions as the Cultural Anchor for the centre [Open Gate], understanding that it would become a permanent home for IY, with the opportunity to curate open invitations to community groups, schools and other cultural organisations to fulfil the vision of Open Gate as a destination for diverse, emerging creative voices to showcase and create on-site. There aren't many art spaces in London conceived by young people from marginalised backgrounds. Being part of this project is not only about housing Intermission Youth, but also about equity, reparations and moving into a more inclusive society.
- Deputy Mayor for Culture and Creative Industries (supports) – It is vital that all Londoners are represented through the spaces we create. Providing space within the development will be a trailblazing example of what can be achieved through meaningful partnership between cultural organisations and new development. It will contribute to the cultural aspirations of the City of London and deliver the ambitions of the Mayor of London's Cultural Strategy.

Policy Context

75. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan 2015 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

76. The City of London (CoL) is preparing a new draft emerging plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024, awaiting Examination in Public which is anticipated to be 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 2040 progresses towards adoption, in accordance with paragraph 49 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.

77. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of very limited weight and will not be referred to in this report.

78. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 and the Planning Practice Guidance (PPG) which is amended from time to time.

79. 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.

80. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

81. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:

a) approving development proposals that accord with an up-to-date development plan without delay; or

b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

82. Paragraph 49 of the NPPF 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).

83. 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.

84. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

85. Paragraph 91 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

86. 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 lives, through promoting good health and preventing ill-health.

87. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

88. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 110 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".

89. Paragraph 117 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; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

90. Paragraph 118 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 and monitored".

91. Paragraph 125 (c) of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

92. 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.”

93. 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.

94. 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

95. 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...’

96. 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.

97. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net-zero by 2050. 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; and support renewable and low carbon energy and associated infrastructure.

98. Paragraph 164 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, including through incorporating green infrastructure and sustainable drainage systems.
99. Paragraph 166 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

100. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 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.

101. Paragraph 210 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."

102. Paragraph 212 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.

103. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

104. Paragraph 215 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".

105. Paragraph 216 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".

106. Paragraph 219 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

107. 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).

108. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

Considerations in this case

109. 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, the documentation accompanying the application, consultation responses, letters of representation and the statutory and policy framework.

110. 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.

111. The principal issues in considering this application are:

- The economic benefits of the proposal;
- The appropriateness of the proposed uses, including the new cultural offer;
- The appropriateness of a tall building on site;
- The appropriateness of the architecture, urban design, and the new public realm;
- The impact on strategic views in the London Views Management Framework and on other strategic local views;
- The impact of the proposal on the Tower of London World Heritage Site;
- The impacts of the proposal on the setting and significance of heritage assets including St Paul's Cathedral;
- The potential impacts of the development on buried archaeology;
- The acceptability of the proposal in accessibility terms;
- The acceptability of the proposed highway and transportation arrangements including servicing, cycle parking provision and impact on highways;
- The acceptability of the scheme in terms of its environmental effects including wind microclimate, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability;
- The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise and vibration, overlooking, daylight and sunlight, solar glare, and light pollution;
- The outcome of the Health Impact Assessment;
- Acceptability of the sustainability credentials of the scheme including appropriateness of the demolition of the existing buildings on the site;
- Acceptability of the proposed security, suicide prevention and fire safety arrangements;
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan, including the paragraph 215 balancing exercise;
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act 1988; and

- The requirement for financial contributions and other planning obligations, including the rescission of City Walkway.

Economic Issues and the Principle of Development

112. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity, and 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 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 economic benefits will depend on the nature and extent of those benefits in light of other planning considerations.

113. 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. For centuries, 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.

114. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

115. 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.

116. 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 is therefore required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

117. The London Plan 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.

118. 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.

119. London Plan policy GG5 sets out the Mayor's good growth policy with regard to growing a good 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; plan 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.

120. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to

deliver this scale of growth and contribute to the maintenance of London's World City Status.

121. London Plan policy E1 stipulates improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) and should be supported by new office provision, refurbishment and mixed-use development.

122. Strategic Objective 1 in the Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan 2015, at 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 2015 recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

123. 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 and enhancing the City's evening and weekend economies; creating new and enhanced culture, leisure and visitor attractions; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces; delivering new, inclusive open spaces and enhancing the City's public realm for everyone; delivering urban greening and greater biodiversity; and creating an inclusive, healthier and safer City for everyone.

124. 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.

125. The application site is situated within the Eastern Cluster as defined in the Local Plan 2015 and the City Cluster as defined in the emerging City Plan

2040. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The emerging City Plan 2040 in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.

126. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan 2040 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.

127. The Strategic Objective in relation to supporting a thriving economy within the emerging City Plan 2040 states that to support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

128. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan 2015 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 further reflected in the Corporations 'Destination City' vision for the square mile.

129. The proposed scheme would deliver on the City's strategic objectives and support the City's economic role by providing a substantial and strategic contribution of 139,845 sqm (GIA) of flexible Class E (office) floor space alongside a complementary retail and cultural offer and extensive public realm. The application site is of the utmost strategic importance.

Land Use

130. This section of the report provides an overview in respect of the proposed site composition and mix of uses before appraising the acceptability of the proposed uses and the loss of existing uses where relevant.

131. A breakdown of the existing and proposed land use split (GIA) is set out below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net change GIA (sqm)
Office (Class E(g)(i)))	44,605	99,005	+54,400
Pure Plant space (nil)	9,257	10,776	+1,519
Ancillary Office (Class E)	-	30,064	+30,064
Office Provision [Total – incl Pavilion office]	**53,862**	**139,845**	**+85,983**
Retail/Market Hall (Class E(a/b)) and/or Drinking Establishment (Sui Generis)	**482**	**1,237**	**+ 755**
Pavilion Building [Total]	**-**	**2410**	**+2,410**
Glass Gallery (F1(b)/(c))	-	313	+313
Event/Exhibition Venue (F1(e))	-	369	+369
Open Gate Studios (Creative Workspace) (Class E(g)(i)/(ii))	-	582	+582
Pavilion Ancillary	-	608	+608
Pavilion Plant	-	538	+538
Cycle hub (Sui Generis)	**-**	**648**	**+648**
Total	**54,344**	**144,140**	**+89,796**

The following sections of the report provide an assessment of the proposed uses.

Provision of Office Accommodation

132. 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.

133. The predominant use of the proposed development is as office space, comprising of 139,845 sq.m (GIA) of Commercial/Office Floorspace (including ancillary space) Class E (a net gain of 85,983 sq.m of office floorspace on this site). The office space is classified as best-in-class, Grade A office space.

134. Adopted Local Plan 2015 policy CS1 seeks a significant increase in new office floorspace in the City. This policy seeks to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver at least 1.2 million sqm net of new office floorspace in the period between 2021 and 2040. This is based on evidence derived from a study conducted by ARUP/Knight Frank on behalf of the City Corporation, which identified the demand or 1.2 million sqm based on a 'hybrid peak' model of workplace attendance, and demand for 1.9 million sqm where there was a 'return to in-person'. The apparent significant reduction in the City Plan 2040 compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.

135. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000-770,000sq.m. The proposed development would deliver a significant amount of this floorspace target for the City Cluster, providing a net uplift of Grade A office floorspace of 85,983 sq.m., equalling approximately 7.165% of the entire City Plan 2040 target. The total floorspace proposed would contribute 8.3% of the entire City Plan 2040 target.

136. The proposed office spaces are designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of interior environment amenity, floor area, and choice of outlook. This would accord with emerging City Plan 2040 policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

137. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The Pavilion building would feature affordable/subsidised Creative Workspace, for which an Affordable Workspace Management Plan would be secured as part of the S106 agreement, which shall include details of specification, layout, facilities, operation and management.

138. 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 2015 and the emerging City Plan 240. 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/Food and Beverage and Loss of the existing Bar (Sui Generis)

139. The site is not within a Principal Shopping Centre or on a Retail Link as defined in the Local Plan 2015 or the emerging City Plan 2040, but is located nearby to the Moorgate/Liverpool Street PSC. Policy DM20.4 of the Local Plan 2015 states that proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated and policy CS20 states that new retail development should be focused on Principal Shopping Centres so that they become attractive shopping destinations. Policy S5 of the emerging City Plan 2040 supports proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand and supports provision of retail uses that provide active and publicly accessible frontage across the City where they would not detract from the viability and vitality of the PSCs. Policy S5 requires major retail development over 2,500 to be located within or near PSCs and requires a Retail Impact Assessment for schemes outside of PSCs of 2,500 sqm.

140. The proposed retail floorspace comprises 1,237sq.m GIA (Class E(a/b)/Sui Generis), an uplift of 755sq.m GIA over the existing site, noting that this floorspace was a drinking establishment (sui generis). This is in addition to the ancillary F&B provision associated with the cultural use in the Pavilion Building.

141. The new spaces proposed would be fit for purpose in the context of the changing retail market, being flexible and adaptable in layout and support of the long-term vitality and vibrancy within the City, and they would complement the neighbouring residential and commercial uses. The proposed retail component of the scheme would create active frontages that would enhance

the public interest and vitality of the public realm across the site. Given the proximity of the Site to the nearby PSC, it would enhance the retailing experience at this important gateway site, and would not detract from or diminish the overall retail offer or vibrancy of the nearby PSC.

142. As the proposal would not provide in excess of 2,500 sqm of retail floorspace a retail impact assessment is not required (this approach accords with paragraph 94 of the NPPF).

143. The proposal would result in the loss of the existing 'Be At One' bar on the site at the corner of Wormwood Street and Old Broad Street, comprising 482sq.m of sui generis (drinking establishment) floorspace. Policy DM20.3 of the Local Plan 2015 seeks to resist the loss of retail units outside PSCs unless it can be demonstrated that they are no longer needed, and the London Plan policy HC7 aims to protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres and night-time economy areas.

144. The applicant has provided details in respect of the constraints of the existing buildings on the Site which Officers have assessed in consideration of the relevant policies including in respect of the loss of the 'Be At One' unit. Officers do not consider that the 'Be At One' unit has particular value considering its small size and lack of inclusive access. The unit would be lost, however, as referenced above the proposal would provide 1237sq.m of fully accessible retail floorspace as the 'City Market', which would substantially offset the loss of the bar in terms of figures alone. The City Market is intended to operate as a flexible food and beverage (Class E(a/b) and drinking establishment (sui generis) venue, depending on the vendors in residency and the time of day. This flexibility would still allow for the operation of a drinking establishment in this location, contributing to economic and social community benefits as well as the wider night-time economy ambitions of the London Plan and the City's Destination City initiative. Further, the provision of fully inclusive access is a considerable enhancement over the existing drinking establishment floorspace for all future users.

145. The proposed retail/food & beverage floorspace is acceptable, the mix of uses would provide a complementary use to the offices within the proposed buildings on site in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with emerging City Plan 2040 policy OF1.

146. The provision of an active retail offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that "The City Corporation will seek to make the City's retail areas more vibrant, with a greater mix of

retail, leisure, entertainment, experience, culture, and other appropriate uses across the City". The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City's growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.

147. A condition is recommended to secure retail uses falling within Class E (a/b) and Sui Generis as proposed, and to prevent the change to any other use within Class E, to secure the benefits of the proposal.

Proposed Cultural Offer/floorspace

148. Policy CS11 of the Local Plan 2015 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 including the cultural quarter focused on the Barbican complex, the Guildhall School of Music and Drama, the Guildhall Art Gallery and City Libraries… Encouraging the use of…other venues… for cultural events alongside their primary uses;
- Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate;
- Protecting existing cultural facilities where there is need;
- Providing visitor information and raising awareness of the City's cultural and heritage assets; and
- Allowing hotel development where it supports the primary business or cultural role of the City.

149. 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.

150. Place specific policy S21 (City Cluster) of the emerging City Plan 2040 encourages complementary uses including leisure, culture and retail to support the primary office function and provide active frontages at ground level, and requires the provision of new and improved 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.

151. 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.

152. The cultural offer for the proposed site is set out in the submitted Cultural Plan in accordance with policy CV2 of the emerging City Plan 2040. The Cultural Plan for the site was prepared by SRD Culture (July 2024) and informed by research into the City's cultural provision, to identify gaps in provision as well as to help inform the development of a cultural offer that would complement as opposed to compete with the cultural offers available in the vicinity of the site.

153. The pre-application research to inform the scheme's design and cultural plan included:

- 60 hours of desk-based research;
- 20 cultural venue visits in person;
- 60 hours of stakeholder engagement with local, national and international stakeholders;
- 10 design workshops and meetings with scheme architects;
- 2 Creative Engagement workshops with young creatives (18-25yo) in a roundtable discussion and co-design workshop format;
- 3 PPA workshops with CoL officers;
- 2 Ward Member discussions;
- 3 sessions with the CoL's Cultural Advisor, Tim Jones;
- 2 public consultation sessions with online participation;
- 1 session with Publica following release of the CoL's Cultural Planning Framework;
- 1 session with the GLA Culture and Creative Industries team;
- 4 sessions with Intermission Youth to inform the needs of a cultural anchor profile;
- 2 sessions with Broadwick Group to inform management structure and costs; and
- 2 sessions with MOLA to coordinate the potential buried heritage assets.

154. As a result of feedback from evidence gathering it was identified that the Site's cultural programme needed to:

- Act as a placemaking beacon for drawing new audiences into the City and retaining area office workers;
- Celebrate architecture, design and social heritage through dynamic exhibition;
- Offer a ground floor that has appeal and visitor amenity;
- Prioritise under-represented creatives and audiences;
- Offer affordable, high-quality creative workspace;
- Offer training and skills development for culture and creative industry;
- Provide spaces for digital production and consumption;
- Complement the existing world-leading cultural offer across the City of London;
- Celebrate the unique City of London context and histories; and
- Provide genuine opportunities for local people, including artists, performers and makers.

155. The principles behind the proposals relate to the site's position on the old Bishopsgate, one of the gateways of the Roman Wall. The 'Bishops Gate' was demolished in the 1760's, now marked by a Mitre sculpture on the building on the northwest corner of the road junction. The gateways of the London Wall were used to separate those inside (within) the City from those outside (without). The applicant has stated that the cultural proposals aim to bridge this separation, or 'phantom barrier[s] of exclusion', through creating a new fully inclusive, welcoming, affordable public offer at this important gateway site. The applicant has stated that the proposals, known as Open Gate, would 'serve as a dynamic catalyst for community engagement, artistic expression, and collective enrichment', offering a new icon for Destination City.

156. The proposed scheme would provide the following cultural spaces:

Open Gate

This is the heart of the cultural offer, and constitutes the Pavilion Building as a whole, named as such to link back to the history of the Site and the gateways, whilst expressing the removal of barriers between those within and without the old City walls – 'a cultural beacon that welcomes all'.

The Open Gate's architecture has been designed as strikingly different from the main tower, a destination in its own right, that would be highly visible, transparent and welcoming. It is set over 6 floors with plant above, and clad in a distinctive map of London as a sizeable piece of public art.

The building offers a permanent, dedicated building for people to dwell, relax, create, participate and share. It is a flexible, multi-format space offering both cultural production and cultural consumption.

The building and its offer would be physically and financially free at ground floor level, with free and affordable rates for those using the upper floors. These floors are discussed in detail below.

The Glass Gallery (ground level and first floor mezzanine)

The Glass Gallery is a double-height, fully-glazed space, acting as a museum and art gallery, freely accessible to the public and with nil cost. It would feature changeable exhibition spaces showcasing artwork in liaison with the cultural anchor tenant, and historic artefacts to be curated in liaison with the London Museum/MOLA.

The exhibitions here could be formed of ‘mobile canvasses’ and a ‘curiosity cabinet’ display for both historic artefacts and contemporary objects and digital displays. They could also be an immediate showcase for the works being created in the studios or performances in the hall.

At level 1, or mezzanine of the Glass Gallery, there would be semi-private areas that could be used as dwell space for visitors or school groups, and could be transformed into a performance space for smaller performances and exhibitions, such as book recitals. This would also be the lobby space for the hall when there are events planned.

It opens out directly onto the public realm from the north and west of the Site, with inclusive access through two entrance doors, with no barriers of entry but still appropriately secured by design.

The Hall (second and third floor level)

The Hall is a double-height exhibition hall with a 200-person capacity located at second and third floor levels of Open Gate. It would be used for performances and exhibitions, with dedicated time to the Open Gate studios tenants (discussed below), local festivals and organisations, and school and community groups.

It has been designed to be fully flexible to allow for different fit outs depending on the planned performances, adapting to the needs of hybrid (analogue/digital) medium, and a range of configurations dependent on audience and performance types.

It would also feature suitable and sufficient back of house production space adjacent to the Hall and in the third-floor mezzanine. This digital element would feature recording and streaming facilities to generate digital works to reach far and wide, outside of the immediate in-person audiences.

The level three balconies would overlook the main space and could be used for standing guests as well as the aforementioned technical back of house functions.

The ticketing for the performances in the Hall would be either free or affordable, based on prices in similar venues in London. There would also be family and alcohol-free events on offer to be a fully inclusive venue.

Creative Workspace (fourth and fifth floor level)

The creative workspace, also known as Open Gate Studios, located at levels 4 and 5 of Open Gate, would be space for creative organisations and individuals to produce, create, and collaborate on projects that could be displayed or performed in the Hall and beyond.

It would be home to the cultural anchor(s) and creative entrepreneur hub on each level, prioritising under-represented creative organisations and individuals. The studios would be available at subsidised and affordable rents.

The studio spaces are also fully flexible to allow for a range of fit outs dependent on tenant need, ranging from large rehearsal studios, small, flexible offices, small studio spaces, open central spaces for collaboration, as well as amenity/back of house facilities.

157. Given the anticipated duration of the construction programme for the scheme it is considered premature to 'lock in' a cultural operator for the site at this time. Notwithstanding, to demonstrate the usability and value of the proposed cultural spaces, the submitted Cultural Plan sets out a proposed operational structure for the building, as well as 'test fit' scenarios to demonstrate how the spaces could be used in the future and possible partnerships. Each option has been informed by research and identifies possible partner organisations that could occupy such spaces.

158. Since the application has been submitted, the Applicant has been continuing dialogue with potential partners including the proposed cultural anchor tenant. At the time of writing, Intermission Youth have been in detailed talks with the Applicant to potentially take over the anchor tenancy. The provision of and full details of the future occupiers would be secured through the S106 agreement. Intermission Youth have also submitted a letter of support for the application outlining their intent to further the discussions with the Applicant and taking the Pavilion Building as their permanent home.

159. Open Gate would be run as a self-sustaining structure. The operation and management of the building is proposed as follows:

- The landlord would appoint a Cultural Operator to manage the facility and oversee curation of the Glass Gallery, The Hall, and Open Gate Studios;
- The Cultural Operator would be responsible for the overall sustainable business model for Open Gate, creating a clear identity;
- The Cultural Operator would be responsible for prioritising local schools, housing estates, local interest groups, residents' forums and faith groups, whilst sourcing commercial hires to offset the free and affordable rates for these groups, and providing overall accountability;
- The Cultural Operator would create sub-leases for the Open Gate Studios which would include a 'Cultural Anchor' tenant and 'Cultural and Creative Industry Entrepreneurs';
- The Cultural Anchor would have a dedicated home within the Studios, receive allocated free or discounted hires of the hall, and act as a community conduit, as well as programming the Glass Gallery;
- The Cultural and Creative Industry Entrepreneurs would receive subsidised rent and a permanent home in the Studios, be allocated free or discounted hires of the Hall, assist in community outreach and programming the Glass Gallery, and contribute to the programme in the Hall.

160. The applicant has provided an example yearly and weekly calendar for Open Gate, showing anticipated programming and split between subsidised hires and events and commercial hires and events.

161. The next steps outlined by the applicant are to secure a Cultural Operator to advise on fit out and detailed design stages, as well as create the business plan for the Cultural Management Plan. In developing the Cultural Management Plan, the Cultural Operator would be responsible for not only the business plan and fit-out specifications, but operating structure and hours, management details, leasing and sub-leasing terms, and the reporting structure.

162. Final details of the operation of the Open Gate and the cultural plan and management plan would be secured through the S106 agreement as part of the Cultural Implementation Strategy.

163. The Pavilion building would provide a free ground floor gallery, free community heritage and creative events, affordable ticketed events and exhibitions, affordable creative workspace studios for a cultural anchor and creative entrepreneur, all connected to exceptional transport links at this key node. The unique cultural strategy and striking, standalone pavilion building provides a substantial public benefit weighing in favour of the scheme.

164. It is considered that the proposal would provide a robust and compelling new cultural offer for the site that would act as a new destination for the City in line with the Destination City initiative, and is in accordance with policies CS11,

DM11.1 of the Local Plan 2015, as well as policy CV2 of the emerging City Plan 2040.

Lack of proposed Elevated Public Space

165. Local Plan 2015 policy DM10.3 and draft City Plan 2040 policies S8, S12 and DE4 seeks 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.

166. Policy D9 (D) of the London Plan states that free to enter publicly accessible area should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

167. No elevated public space is proposed on site. Officers note that the aforementioned policies state that such spaces should be provided where appropriate, not that they must. Officers consider that such a space would not be appropriate in this location given its proximity to residential properties to the north, being constrained by other tall building development to the south and east which limits views to the north and northwest, and that the proposed Pavilion cultural building is a significant public benefit in and of itself, providing free and affordable ticketed and inclusive public access, meeting the same aims as the requirement for free-to-enter public viewing galleries.

168. As such, the public benefits associated with the proposals and other justification sufficiently outweighs the lack of public viewing gallery proposed on Site. However, this would result in non-compliance with emerging policy DE4 (3) of the City Plan 2040. It is to be noted that although this Plan has been submitted for Examination in Public (EiP), it currently has limited weight.

Land Use conclusion

169. Strategic Policy S21 of the City Plan 2040 supports the development of new tall buildings together with complementary land uses, transport, public realm and security enhancements to accommodate a significant growth in office floorspace and employment, through increasing the provision of attractive world class buildings that offer a range of office accommodation to cater for the needs of varied office occupiers and encouraging complementary leisure, culture and retail uses to support the primary office function.

170. The proposed development for a significant increase in Class E office floorspace accords with the primary strategic aim of the Local Plan 2015 and the emerging City Plan 2040, being to deliver new, Grade-A office floorspace

to maintain the City's position as the world leading international finance and business centre.

171. The London Plan policy D3(a), encourages a design-led approach to optimise the best capacity of land by ensuring that development is of the most appropriate form and land use for the site, and in policy E1(a) encourages the improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. The London Plan policy SD5 reinforces the importance of office floorspace within the Central Activities Zone (CAZ) (which the site sits wholly within) and encourages intensification of office floorspace within the CAZ through redevelopment and refurbishment.

172. Local Plan 2015 policy CS1 seeks to ensure the long-term provision of office floorspace of the highest quality.

173. The provision of an additional 85,983sq.m (GIA) of Class E office floorspace is therefore welcomed in the spirit of the aims of the adopted Local Plan 2015 and emerging City Plan 2040, and Officers consider that the site has been optimised in line with the aims of the London Plan policy D3.

174. The provision of the cultural floorspace is also welcomed in the context of emerging policy S6 (Culture and Visitors) and the Destination City initiative. The provision of retail/F&B floorspace to complement the other proposed uses on site as well as neighbouring commercial and residential uses is also welcomed.

175. Overall, it is considered the proposed development is in accordance with policies CS1, DM1.2, DM1.3 and DM1.5, CS11, CS20 and DM20.4 of the Local Plan 2015, policies S4, OF1, S5, RE4, S6, CV2, CV3, CV5, S8, S12, and S21 of the emerging City Plan 2040, as well as the aims of the London Plan, in delivering growth in office floorspace and employment.

176. Officers acknowledge that the proposals fail to undertake a sequential test for cultural floorspace in accordance with paragraph 91 of the NPPF and London Plan policy SD7. However, the justification is noted and the public benefits stemming from proposals are considered sufficient to outweigh any non-compliance. Officers also acknowledge that the proposals do not include a high-level public viewing gallery as encouraged by policies S8(17) and S12(h) of the draft City Plan 2040 and London Plan policy D9 (D), and required by emerging policy DE4 (3), but consider that the public benefits of the proposals, and in particular the provision of a standalone, unique cultural Pavilion building, would sufficiently outweigh the lack of free, high-level public viewing gallery on site.

Principle and Impacts of a Tall Building

177. The relevant local policies for consideration in this section are Local Plan 2015 policies CS7 (Eastern Cluster) CS14 (Tall Buildings), and emerging City Plan 2040 policies S12 (Tall Buildings and Heritage) and S21 (City Cluster); London Plan Policies: D9 (Tall Buildings).

Principle of a Tall Building

178. 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 D9 (A).

179. The site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant office functions, in line with London Plan Policy D4 assessed elsewhere in the report. 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.

180. The site is central to the City's growth modelling, the significant majority of which would be accommodated in a consolidated City Cluster of tall buildings, and would deliver a total of 99,005 sqm lettable office floorspace towards 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.

181. The City's long-term, plan-led approach to tall buildings is to Cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).

182. The site is located within the Eastern Cluster Area. The adopted Plan Policy CS7 and Fig G identify the Eastern Cluster as an area within which tall buildings can be delivered on appropriate sites. Policy CS14(1) takes a consistent approach in stating that the aim of allowing tall buildings of world class architecture and sustainable and accessible design will be achieved by permitting tall buildings on suitable sites within the Eastern Cluster.

183. In the emerging City Plan 2040, the site falls within the City Cluster Tall Buildings Area (S12 (2) Figure 14). The majority of the building aligns with the 240m AOD contour with the lift core and plant rising to 253.5m AOD in height positioned close to the 260m AOD contour line. As such, the proposals would successfully mediate between 240m and 260m AOD contours and comply with emerging policy CS12 (3) and Figure 15. The proposal would also 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 conflict with S21 (5) because the proposal has been found not to preserve the settings of several designated heritage assets outlined below.

184. The Surveyor to the Fabric of St Paul's Cathedral (St Paul's Cathedral) objects to the application proposals and partly in relation to the emerging City Plan 2040 and how the contour lines would allow this proposal to come forward. These matters will be considered as part of the Examination in Public (EiP) and are not directly relevant to the assessment of the current application. Officers however are clear that although the City Plan 2040 has been submitted for EiP it does not currently have the same status or weight in decision-making as the City's adopted 2015 Plan.

185. Officers reach a different conclusion to St Paul's Cathedral and consider the principle of a tall building on this site is appropriate. The proposal draws strong support from the adopted development plan policies CS1 and CS7 (1,2,4-7) which seek to ensure the Cluster can accommodate the Plan's significant growth in office and employment floorspace, whilst, notwithstanding the heritage impacts identified below, complying with CS14 (1) (Tall Buildings), which seeks to consolidate tall buildings where they are least impactful on the strategic heritage and character of the CoL and London.

186. This suitability of the site in principle is at the heart of the design-led optimisation of site capacity when assessing this against wider heritage and design policies and other policy requirements. Officers have assessed these impacts in the relevant sections below and conclude that, while there would be adverse impacts on the settings and significance of identified designated heritage assets including to the Cathedral and other assets, these impacts have been minimised as far as possible through design and clearly and convincingly justified as required by NPPF para 213 and that the site is therefore suitable.

187. St Paul's Cathedral fundamentally objects to the height and massing of the proposed tall building in this location to "multifaceted heritage" harm they have identified to the Cathedral from Waterloo Bridge, Hungerford Bridge, Gabriels Wharf and Somerset House Terrace. Historic England offers a similarly strong objection on these grounds and also in relation to harm they have identified to

the view from the Blue Bridge of St James's Park; they have however not expressly stated that they objection to the principle of a tall building on this site.

188. The GLA Stage 1 Letter however supports the proposal in principle, commenting "The *current City of London Local Plan Policy CS7 states that new tall buildings are expected to be located within the Eastern Cluster, and the site does not lie within an area identified as being inappropriate for tall buildings in current Policy CS14. Within the draft City Plan 2040, the site falls within the area identified as being suitable for tall buildings, as per Strategic Policy S12 and Figure 14. The proposed tower element also sits within the tall building '240 metre' height contour in Figure 15 (also known as the 'jelly mould'). For these reasons, the principle of a tall building on this site is supported in accordance with the locational principles of London Plan Policy D9 Part B".*

189. Officers have scrutinised the principle of a tall building of this proposed height in this location from evolution stage at pre-application against adopted Local and London Plan policies as well as emerging policies. Officers consider the principle of a tall building of this height on this site is appropriate and complies with the locational policies of D9 B (1-3). An assessment against London Plan policy D9 C and D is made below, with reference to other sections of this report for more detail. It is found that, save for conflict with D9 C (1; a; i), the proposal would satisfy their criteria.

190. Although, as discussed below, the proposal would cause less than substantial harm to the significance of some 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. These impacts are addressed in detail in the report below, but officers do not consider that they are of the magnitude that would render the site inappropriate in principle for a tall building of this height.

191. As such, officers consider that the site would be suitable for a tall building and that the proposals would comply with Local Plan policy CS14 (1), emerging City Plan 2040 Policy S12 and London Plan D9 B (3), notwithstanding the degree of conflict identified with regards to London Plan D9 C (1; a; i), Local Plan CS7 (3) and emerging City Plan 2040 S21 (5) with regards to designated heritage assets. These conflicts with Development Plan policy are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Tall Buildings – Impacts

192. This section assesses the proposals against the requirements of 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.

193. The proposal would be read as part of the consolidating City Cluster, defining the 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.

194. The proposal has been designed with the future evolution and consolidation of the Cluster in mind under the emerging City Plan 2040. In London-wide and riparian views, the proposal would deftly navigate the transition in scale of the emerging very tall towers at the centre of the established modern city Cluster towards this outer western fringe. The siting, height, diagrid system and chamfered, filigree silhouette would bring a coherent sophisticated architectural expression to the Cluster and coherently define the composition on the skyline. This has been informed by significant 3D modelling activity testing different options to ensure that the Cluster can develop and consolidate while minimising the possibility of harm to the City's strategic heritage assets.

195. The GLA comment "*the submitted documents demonstrate that the proposed massing, architectural expression, and external treatments would result in a high-quality skyscraper that would be a distinctive addition to the City's skyline. The proposed building height appears to sit comfortably in the context of the Eastern Cluster and responds appropriately to its position at the northern edge of the Cluster by virtue of its lower height relative to taller buildings emerging towards the centre, and its chamfered western elevation*".

196. At 53 storeys, ground plus plant (253.5 m AOD), the proposal would be the fifth tallest building in the City Cluster. In comparison, other existing and consented tall buildings in the Cluster are given here for reference (in descending AOD height order):

- 1 Undershaft: 309.64m AOD (resolution to grant)
- 1 Undershaft: 304.9m (2016 consent implemented)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate 284.68m
- 100 Leadenhall 263m
- **99 Bishopsgate 253.53m** – Proposal
- 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
- 60 Gracechurch Street: 162m (resolution to grant)
- 20 Fenchurch Street: 160m
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m
- 50 Fenchurch Street: 149.6m

Visual impacts

a) the views of buildings from different distances

197. In relation to long range views D9 C (1; a; i), these have been tested in the THVIA August 2024 (for example 14,22, 23, 56-61, A20, A21-A25) in baseline and cumulative scenarios. In panoramic 360-degree views across London, 99 Bishopsgate would be viewed as an integral part of the existing and cumulative city Cluster. Views from Camden, Islington, Westminster, Tower Hamlets, Lambeth, RBKC and Southwark have also been included and there are no objections from these neighbouring Boroughs (A1-A3, A7, A11-A13, A20-A26).

198. Framed by the neighbouring buildings at 22 Bishopsgate, Heron Tower, 100 Bishopsgate and, in the cumulative, 55 Bishopsgate and 55 Old Broad Street. In long views its height and location would help to define the western existing silhouette of the Cluster, responding to the existing skyline where building heights step down from the centre to the western periphery with the feathered green edge and raking silhouette softening the transition to Angel Court and the finer urban grain of the City immediately surrounding the Cathedral. In this crucial consolidatory role, the proposal would result in a number of minor enhancements to LVMF Panoramic views.

199. In nearer baseline and cumulative visual experiences of the Cluster from: the south and west side of the Thames (Queen's Walk View 8, Tower Bridge View 9 , Butlers Wharf, London Bridge View 15, Millenium Bridge View 36 and Southwark Bridge 37) and from the east of the City (Commercial Road and Wentworth Street (Views 5 and A1)) the development would be mostly or completely obscured by the taller buildings in front, resulting in either no or a very minor impact on the view.

200. In baseline and cumulative river views (THVIA views 26-34) the development would perceive to expand the western fringe of the City Cluster closer to the Cathedral and, in the main, this would have a noticeable impact and positively contribute to strategic visual experiences. However, officers do acknowledge

adverse impacts on the setting and significance of the Cathedral from the north of Waterloo Bridge, where the proposal would infill some of the clear sky space near the Cathedral and bring the Cluster closer to it, and to a lesser extent from Hungerford Bridge. In addition, from the blue bridge in St James's Park (THVIA views 24-26) there would also be slight and momentary adverse impacts to heritage assets within the strategic viewing experience.

201. In mid-range views in baseline and cumulative scenarios (e.g. Curtain Road View 1, Shoreditch High Street View 2, Aldgate Square View 6, Finsbury Circus View 47, London Wall 48, Exchange Square 51 and from Bank), only the upper levels of the building would be seen above foreground buildings. Slightly closer to the site (e.g. Bishopsgate View 3, Gracechurch Street View 18, and London Wall View 49), the building would be framed by other tall buildings and the architectural geometry, filigree and elegant tapered silhouette would be appreciated.

202. Closer range views (e.g. from London Wall View 50, Liverpool Street View 52, Wormwood Street View 55, St Helens Place View 19 and 20, and Bishopsgate View 4, 19, A10, Camomile Street View 21 and St Botolph's Churchyard View 54) demonstrate how the building would be experienced at street level. Within this immediate environment, the proposed building would be seen and understood in the context of other modern and contemporary tall buildings, including 100 Bishopsgate, 22 Bishopsgate and cumulatively with 55 Old Broad Street and 55 Bishopsgate.

203. Immediate views would change, as the proposed building would be larger than the existing but more porous and outward facing and is designed to complement and integrate with other tall buildings, particularly 55 Bishopsgate. The proposed development would introduce another contemporary building with elegant and intricate architectural expression which would become a visually rich landmark, sitting comfortably in between its iconic neighbours of 22 Bishopsgate, 100 Bishopsgate and the Heron Tower. The New York "flat iron" geometry of the building would create a characterful chamfered corner and the ground floor and would support enticing verdant colonnades, decorative soffits, a welcoming food hall, and introduce new people-focused routes. Together with the smaller cultural pavilion to the west 99 Bishopsgate would humanise, soften and brighten the bustling intensity of the current pedestrian experience. This would become a memorable place to linger rather than swiftly move through.

204. In relation to D9 (C 1a i, ii and iii) and strategic visual experiences at macro and local scale, the comprehensive HTVIA demonstrates the development, in the main, would read as a successful addition to the existing City Cluster of tall buildings. However, Officers acknowledge the isolated adverse impacts of the

upper storeys in momentary experiences in strategic views LVMF Views Waterloo Bridge 15B.1 and 2, LVMF 17B.1-2 Hungerford Bridge and 26A.1 St James's Park and therefore there would be a conflict with D9 C (1; a; i). This is assessed in detail elsewhere in the heritage and strategic views section of the report.

205. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidate the north-western periphery of the City Cluster. Occupying a key corner location, it would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding in all directions 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, where the Cluster identifies the original commercial heart of London since Roman times. The proposal would help to further articulate the building heights defining this area of the Cluster and signifying it as the northern gateway into the financial district and the proposal would comply with D9 C (1; b).

206. In relation to D9 (1; c) the proposal would be of a rare, intrinsic elegance in its architectural design and material specification, and this would be maintained through its life span and are discussed in detail in the architecture section of the report. The trapezoid footprint, diagrid structural facades, dynamic lift core, alluring soffits, colonnade, and filigree gardens and terraces are clearly well-considered. In the round, the building would offer different visual experiences which can be appreciated at macro and close range complementing the equally expressive proposed cultural pavilion building. Final details of materiality are proposed to be secured through conditions, with greater detail provided for elevations to ensure the design intent would be executed to the highest quality. Overall, the building would be visually distinctive, of the highest architectural quality, and an attractive addition to the skyline, and is considered to comply with D9 C (1; c).

207. In relation to D9 C (1; d) a full assessment of impact with regards to heritage assets is detailed in the Heritage section of the report. Officers have identified the following adverse impacts:

- A low level of less than substantial harm has been identified to the significance of St Pauls Cathedral (grade I)
- Very slight levels of less than substantial harm (very much lower end of the spectrum) St James's Park (RPG);
- Slight levels of less than substantial harm have been found to the significance of Whitehall Court (grade II*), War Office/ Ministry of Defence (grade II*), and Horse Guards (grade I).

208. Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.

209. For the reasons set out in this report, it is considered that there is clear and convincing justification. It would optimise the capacity of this site identified as appropriate for a tall building and deliver an essential contribution to the provision of required office space as set out in the office section of the report.

210. To optimise the site, while minimising any adverse harm, alternatives to massing were explored and are described in relation to D4 Design Scrutiny section below. Further key amendments to reduce heritage impacts were undertaken to the northwestern silhouette which has changed from a sheer vertical rise, stepped and then as proposed a meaningful raked profile spanning from level 40 to level 56. This fold over sixteen floors from a datum corresponding to the apex of the dome of Cathedral and the base of the lantern. The inclined profile softens the leading edge of the Cluster and defines a termination to the lower, more varied conservation context to the north. This 'feathering' and erosion of the western edge is further accented by large open terraces with visible greenery and the expression of double-height landscaped winter gardens behind single glazing.

211. Following these key changes to the massing and form at the early stages of pre-application minor adjustments were subsequently made to the structure of the chamfered edge at the top of the building setting it behind the glazing to soften its appearance and reflect the sky. Additional testing was also undertaking on colouration options to be formally secured at condition stage to better distinguish the tower from its neighbour 55 Bishopsgate and St Paul's Cathedral.

212. St Paul's Cathedral object to the proposals and that despite design changes the proposals would be dominant and harmful and vary according to changing conditions. The Cathedral is critical of the analysis undertaken by the applicants which, in their view, has not followed a conservation-management approach and it has not been demonstrated how the clearly harmful impacts could be entirely designed out.

213. Officers disagree with the level of harm identified by the St Paul's Cathedral. Further, officers consider the extensive design changes described above to have successfully minimised and mitigated the harmful impacts identified, whilst allowing the capacity of the site to be optimised to the full. The vast chamfer on the northwestern corner is critical to the acceptability of the scheme in relation to the Waterloo Bridge view. It demonstrates clear deference to the silhouette of the Cathedral and the harmful impact on its setting is relatively fleeting, occurring only at the north end of the bridge.

214. Officers therefore consider that the proposals, in their contribution to the City's strategic economic and cultural objectives, are clearly and convincingly justified, that alternatives have been thoroughly tested to minimise and mitigated the harmful impacts identified, and that there are clear public benefits which outweigh the harm. This is elaborated on further in the Planning Balance section of the report. As such the proposal is considered to comply with D9 C (1; d).

215. In respect of D9 C (1; e) there would be some, limited, visibility from in and around the Tower of London WHS glimpsed between other Cluster buildings and usually framed by foreground buildings 40 Leadenhall and 52 Lime Street as demonstrated by HTVIA views 9 (LVMF10A.1) 11 (representative of Local Setting Study view), 12 and 13. 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).

216. In respect of D9 (C; 1; f), the proposal would be set well back from the banks of the River Thames located to the north of the Cluster and outside the Thames Policy Area. The development would either be largely screened by other parts of the Cluster or step down from other taller buildings in baseline and cumulative scenarios including 22 Bishopsgate and 55 Bishopsgate. The development would not impinge on the stepping down to 20 Fenchurch Street which forms the "prow" of the Cluster and which then steps down to preserve the historic scale of the Upper Pool of the River Thames, preserving 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).

217. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered, at its worst, to be minor adverse but the effects are not significant, as discussed in the relevant section in this report. The design of the buildings proposed have been optimised and glazing would be broken up by less reflective parts of the buildings, so the proposed development would not generate solar glare effects that pose danger to users of the transport network. Details of the external materials would be provided by condition in order to ensure safe and comfortable levels of solar glare / convergence including mitigation such as non-reflective glass coatings, if necessary.

218. As such it is considered by Officers that mitigation measures would overcome the minor adverse effects in the worst-case scenario caused by the development. Further details would also 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.

219. 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 would be secured in detail via condition. The potential light spillage impacts from the proposed development on surrounding existing residential buildings have been assessed and are addressed within the Light Spill section of the Environmental Impacts chapter of this report. The section concludes that when mitigation measures are taking into account, as required by condition, the impact of the development would be negligible and the effect not significant.

220. The development has been designed in accordance with details and technical requirements of the City of London Lighting SPD, would be in accordance with the Corporate Lighting Strategy and an informative would be added in terms of following the Considerate Lighting Charter.

221. As such, Officers are satisfied that the proposed development would comply with D9 C (1; h) as a result of the details required through a condition to address potential glare issues.

Functional Impact

222. 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).

223. The proposed servicing strategy would see the retention of the existing arrangement found at the site, via a ramp to the west of the site, via Union Court. The proposed servicing strategy includes consolidation of deliveries, and any deliveries would be time limited and managed for safety. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that would preserve safety and quality, without

disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b).

224. The permeable ground floor food hall and pedestrian routes result in an increase in the amount of usable public realm, around the perimeter of the site. Locations of entrances and access routes would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. Although not part of this application, the ground floor layout allows for connecting to the future pedestrian routes consented for the adjacent 55 Bishopsgate. The site has an excellent public transport accessibility rating of 6B, with underground and rail stations in close proximity, as well as numerous bus routes and cycle superhighways nearby in accordance with D9 C (2; c).

225. As discussed in the transport section of the report, there would be an uplift in pedestrian and cyclist activity on the wider transport network, but particularly Bishopsgate, as a result of the development. The impact on the transport network would result in a requirement for the highway to be adapted, which would be assessed and delivered by TfL as part of a section 278 agreement. The needs of all users would need to be considered in detail to inform a revised design for Bishopsgate and Wormwood Street other neighbouring streets which accommodates the impact of the proposals. This would be secured through a s106 agreement would require the developer to enter into a s278 agreement with TfL, and financial contributions would be secured through the s106 by TfL to undertake any necessary works to deliver any highway works to mitigate the impact of the development in accordance with D9 C (2; c) and London Plan Policy T4 Part C to E.

226. In particular, the provision of cultural spaces in the pavilion building, retail and food and beverage offer at ground and office floor space would promote the creation of jobs, services, facilities and economic activity which would act as a catalyst for future growth and change within the locale in accordance with D9 C (2; e).

227. No adverse effect has been identified on the operation of London's aviation navigation and the proposals also have been found to avoid significant detrimental effect on solar energy generation on adjoining buildings and thereby comply with D9 C (2;f).

228. Overall, it is considered the proposal would meet the functional considerations of Policy D9 C (2).

<u>Environmental Impact</u>

229. 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 would not compromise the comfort and enjoyment of the public realm around the building. In regard to (D9 3b-c), would 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 in the Environmental Impacts section of the report. The objections received with regards St Ethelburga's raise concern with the wind and daylight sunlight impact of the proposed development on their building and its operation, in particular the peace garden. As discussed in the Environmental Impact section of this report, the Proposed Development would not have a material impact on the external environment around or in St Ethelburga's Peace Garden by way of a loss of light (overshadowing), solar glare, or an increase in wind occurrence or speed.

230. It is considered the proposal would meet the environmental considerations of Policy D9 (C; 3)

Public Access

231. The main building features an open and accessible 'City Market' (1237sqm) at the base of the building that would be welcoming and encouraging of all members of the public, including visitors, tourists, office workers and all members of the public. The City Market would also provide public amenities (including accessible toilet facilities).

232. Further Class F/sui generis (2,410sqm) uses are proposed in the pavilion building. The unique, standalone pavilion building to be known as 'Open Gate' forms the cultural offer, of cultural facilities and affordable workspace that would comprise: (i) the Glass Gallery at ground floor with public access and free exhibitions; (ii) the Hall space that would be available for hire and would offer (as secured by a management plan agreed with the City) a mixed programme of free or affordable curated events; and (iii) the Studios, which would provide subsidised and affordable creative workspaces. It is considered that the provision of publicly accessible areas has been optimised in respect of the site's particulars and that the proposal would meet the considerations of Policy D9 (D) as well as Local Plan S19; DM10.3(2) and Emerging City Plan S12(4).

233. There would be no elevated public space provided within the proposals. It is considered that this is acceptable for the reasons set out in preceding paragraphs, although it would draw non-compliance with emerging policy DE4 (3) of the City Plan 2040.

Conclusion on Tall Building Principle and Impacts

234. Overall, officers consider the site to be appropriate for a tall building and an essential, strategic delivery location supporting the consolidation of the City Cluster. This position is supported by the GLA. Officers consider that the proposal would optimise the capacity of the site whilst minimising harmful impacts and that it would strike the right balance in this respect.

235. As a matter of planning judgement, it is considered the proposal would accord with: London Plan Policy D9 Tall Buildings A, B, C (all parts except 1; a; i); Local Plan Policy CS7 Eastern Cluster 1,2,4-7, CS 14 and all parts of emerging City Plan 2040 policy S12 and S21 the principles set out in Historic England Tall Buildings 2022. There is a conflict with: London Plan policy D9 Tall Buildings C (1; a; i) visual impacts long-range views; Local Plan 2015 policy CS7(3) Eastern Cluster; and emerging City Plan 2040 policies S21 (5) City Cluster due to heritage impacts and DE4 (3) due to the lack of a proposed elevated public space. These conflicts are considered against the Development Plan as a whole as part of the Planning Balance.

Architecture, Urban Design and Public Realm

236. The relevant policies under consideration here are: Adopted Local Plan 2015 policies: CS 10 (Design), DM10.1 (New development), DM10.2 (design of green roofs and walls) DM10.3 (roof gardens and terraces) , DM10.4 (environmental enhancement), DM10.8 (access and inclusive design) , CS16 (public transport) DM16.2 (pedestrian movement) , CS19 (open spaces and recreation), DM 19.1 (additional open space) and DM19.2 (biodiversity and urban greening); emerging City Plan 2040 polices : HL1(inclusive buildings and spaces), S1 (Healthy and Inclusive Cities), S8 (Design), DE1(sustainable design) , DE2 (design quality) , DE3 (public realm) , DE4 (terraces and elevated public spaces) , DE8 (lighting), S10 (active travel) AT1 (pedestrian movement and wayfinding), S14 (open spaces and green infrastructure), OS1 (protection of open spaces), OS2 (urban greening), OS3 (biodiversity), OS5 (trees); and London Plan 2021 policies:D3 (optimising site capacity) , D4 (delivering good design), D5 (inclusive design), D8 (public realm),GG1-3, GG5,GG 6 (Good Growth Policies) , National Design Guide 2021 and NPPF 2024 (Achieving well designed and beautiful places). Further guidance on the design of the public realm is contained within the City of London Public Realm SPD, the City of London Open Space Strategy SPD, and the City Public Realm Toolkit. This is in addition to the best practice guidance provided by the GLA.

Architecture

Existing Context

237. Located on the northern boundary of the Eastern Cluster, the site sits at the interface between predominantly low-rise traditional built form around Liverpool Street Station and adjacent Conservation Areas and much taller, larger plan forms of contemporary 20th and 21st century office structures. The site forms an important threshold condition between the two.

238. Adjacent to the site, to the north, is Bishopsgate Conservation Area, while to the east lies the Conservation Area of St. Helen's Place; these relatively low-rise enclaves sharply contrast with the very tall buildings at the apex of the Cluster and the lower tall buildings which form the Cluster's edges. The development site is at the heart of this dynamic townscape which is fundamentally shaped by its proximity to other tall buildings, as well as being a pivotal site central to several pedestrian routes connecting key landmarks and destinations.

239. Tower 42 is located immediately to the southwest. There are several other tall buildings in close proximity. These include the Leadenhall Building (122 Leadenhall Street), TwentyTwo (22 Bishopsgate), the Heron Tower (110 Bishopsgate) and 8 Bishopsgate and in cumulative scenarios 55 Bishopsgate and 1 Undershaft. These large and tall modern commercial buildings are contrasted with more fragmented surviving remnants of the historic townscape of the City's commercial core: the defining 'genius loci ('spirit of the place') of the Cluster.

Existing building

240. Built in 1976 and designed by Architects R. Seifert & Partners for HSBC, the existing Site comprises a 28-storey tower 121.5m AOD atop a 5-storey podium with a single basement level and an elongated hexagonal floorplan. The existing building is office-led with a small retail component and has inactive frontages to Wormwood Street, Old Broad Street and Bishopsgate. It comprises, at the lower levels, a 5-storey podium which fills out the site to the street frontages with a near-square tower element set back from all boundaries, forming oblique, informal relationships to the primary frontages. The building was damaged by the IRA bomb in April 1993 and the former green glazing and stainless-steel fins of the tower and podium were re-clad in pale blue and white panels between flush aluminium panels at the time the podium was increased in height.

241. To the north-west, a narrower portion of the site extends to Old Broad Street and is occupied by a lower building fronting onto Wormwood Street, currently occupied by a retail/drinking establishment occupier, 'Be At One'. This building serves to screen the primary vehicular access to the site via a ramp on Old Broad Street. Currently, the site is impermeable to the public and the former City Walkway, an elevated public route is currently closed and there are variable site levels around the perimeter.

242. Overall, the existing buildings are awkwardly positioned, unengaging at street level and the recladding has diminished the Seifert hallmarks and there is an absence of quality in the overall architectural expression. The building is not identified as a non-designated heritage asset.

The proposal

243. The development comprises two distinct elements, the commercial building of 53 storeys above ground fronting Bishopsgate and Wormwood Street and the 55 Bishopsgate development, and the modest pavilion building of ground plus five storeys fronting Wormwood Street and Old Broad Street. There is also the public cycle hub of ground plus two storeys within the centre of the Site.

The Tower

Height and massing

244. The evolution of the height, orientation and envelope is a direct response to the multiple visual contexts and constraints at close quarters and skyline level in particular those experiences from Waterloo Bridge and St James's Park. The scale and massing, active edges, orientation and layout are additionally shaped by the consented development at 55 Bishopsgate with which it shares a southern boundary; microclimate; retention of the existing basement raft; and a commitment to high functioning architecture which is at the heart of the design rationale.

245. As experienced in long and mid-range views the height would cascade across the site, stepping down from the proposed servicing core of 253.5m AOD (53 storeys, ground plus plant) to the 240.5m AOD of the main commercial block, which would through its raking north-west edge step down to 40 storeys.

246. The massing and floor plates are extruded from a trapezoidal plan. The geometry of angled elevations of diverse sizes, expressed three dimensionally, reduces the overall mass of the block, creating an ever-changing, dynamic silhouette in all directions depending on light conditions and orientation.

247. The tall building is contained by a sophisticated gridded elevation system which lands to ground and rises above a setback four storey glazed base and colonnade which anchors the building in this gateway position fronting Bishopsgate and Wormwood Street. The geometric tower extends upwards and is clearly divided into three parts – active public base and circulation, middle and crown. The tallest point of the tower is the modelled crown with the high functioning service core elevated above the main datum creating a stepped profile. This would echo other articulated roof forms in the Cluster including 22 Bishopsgate, Heron Tower and Tower 42 and would read from a distance as an elegant terminating silhouette of diminishing proportions.

248. Chamfered narrow northern corners to the NE and NW would be particularly impactful in reducing perceived massing in long and mid-range views and introduce a distinctive flatiron character which wraps round the east, west and north elevations. At street level this would create a defining sense of place, with strong but human-scale building lines at key movement intersections and frames and new walkable routes which traverse the site, intuitively navigating pedestrians to the City Cluster from Liverpool Street station.

249. The NW chamfer elevation distinctively holds the corner and from level 8 includes a sequence of interweaving, generously proportioned, four-storey open terraces and enclosed, wintergardens which extend up this entire corner. At level 41 the building envelope is raked back to the summit to address important views of St Paul's from the south-west. These features create a feathered, soft edge to the building which is evident in multiple long and mid-range visuals experiences in western and northern approaches. This filigree silhouette and with angular building lines introduce an intricate form on this northern periphery of the City Cluster, softening the leading edge to adeptly navigate the change in scale from City Cluster to the finer urban grain to the north and west.

250. A similar purposeful chamfer addresses the busy NE transport intersection. This architecturally contrasts with the NW soaring as a consistent narrow vertical rise of 2 storey stacked winter gardens from level 4 to level 56. Again, this treatment introduces a theatrical, green, elegant but sheer façade profiling this entire corner and the wintergardens provide a lightness and sense of reduced volume working as a foil to the more muscular glassy forms of the neighbouring towers at 100 Bishopsgate and 22 Bishopsgate.

251. The winter gardens and terraces are integral to the sophisticated handling and massing across the site and are equally expressed on north and east elevations framing the edges breaking up the otherwise glazed solidity. The

cut outs, structural framework, transparency and urban greening bring lightness of volume around the façade.

252. The footprint and ground floor layout is splayed on the southern boundary creating a shared, enlarged public space and new route at pedestrian level and opening up a new view of St Ethelburga's Church on Bishopsgate. This tight relationship logically lends itself to the location of the main service core which projects from the orthogonal plan and again this contributes to the consistent language of articulated floor plate in plan and facade. This functional core, the tallest part of the development, is positioned on a lower-value and less user-friendly elevation. In the cumulative scenario this would largely be concealed by the existing and consented schemes, particularly at 55 Bishopsgate, but where visible in views from the south and west the core would easily be understood to have a functional purpose which would be expressed architecturally. It would be perceived as a striking, articulated and functional volume but recessive in character compared to the complex geometry of the overall tower and other elevations.

Architectural expression and materiality

253. The architectural expression is dictated by the fundamental philosophy of pristine engineering maximising structural efficiency and a commitment to the essential and intelligent functionality of each component. Officers strongly consider that this alone lends the scheme an innate design excellence. Central to the evolution of the architecture has been reducing embodied carbon and delivering a highly systematic circulation system.

254. The angular geometry of the main building informs the layout, appearance and materiality of the tall building. Stabilising structure is provided by new foundations and a perimeter exoskeleton frame in the form of an expressed layered mega grid of braced tubes that defines and encloses the office floorplates. By utilising a large floor plate, the bracing of the tube framework is stable and efficient and responsive to wind loads. This engineered diagrid structural system wraps the building negotiating the chamfered plan and allowing the retention of existing below ground internal columns and raft foundations discussed in more detail in the sustainability section of the report.

255. Glazed facades are wrapped in full height eight storey multilayered structural sequences of vertical, horizontal and diagonal substantive bracing with nodal points. This structure creates a dramatic architectural exoskeleton and internal rhythm of triangular patterning complementing the geometry of the block plan and is appreciated at macro and close quarters. This 'diagrid' is typically expressed in front of the primary building facade but was reassessed with City Officers and set behind the single glazing that forms the two 'feathered' edges

or prows to the north-east and north-west of the building. This moderates the overall building volume whilst giving lighter edges where the building presents itself on the edge of the Cluster.

256. This structural sequence is integrated to the internal arrangement through interstitial vertical bracing in the triangular soft core at the centre of the floor plate and additional bracing on the southern perimeter of the satellite service core. The complex structural components deliver highly desirable commercial floor plates with minimal columns.

257. Each of the floor plates is served by two support cores. The central triangular soft core maximises depth of office space and access to natural light to the north, east and west. This core serves every floor level and contains fire safety systems and services only in order to minimise space take on floor and maximises riser access to floors.

258. The main core to the south is an external satellite located in the least value aspect which sits outside the existing raft foundations and accommodates all passenger lifts with mid- and high-rise lifts which minimise space take at reception and ground level. Air handling is efficiently integrated into the south core. This saves on both risers and energy consumption overall by locating the air handling and reclaim units on-floor within the non-active lobby areas. These lobbies allow air intake and exhaust directly via the external plenums to the outside creating a unique and sculptural arrangement based on functional requirements.

259. The appearance and legibility of the southern support has been refined to more clearly express its functional elements in both mid- and long-range views. Distinctive colours and a more defined structural expression enhance its visibility. At ground level, the core's envelope transitions to glass, revealing the human scale and the workings of two double-deck lift groups, further brought to life by colour and the dynamic of moving lift equipment. Across the height of the core, clear, vertically banded glazing reveals the passenger lift shafts and lobbies, offering dynamic glimpses of lift activity and adding visual richness throughout the building's full height.

260. At ground public and private functions are prominent and legible, comfortable for users and would provide much needed respite within the dense high intensity environment of Bishopsgate where public spaces for relaxation and leisure are at present limited. The ground floor of the lower-level façade is also defined by the expressive, gridded exoskeleton with monumental structural tridents anchoring the building perimeter of the building. The four-storey façade is set back creating an external colonnade wrapping around the site which would provide a human scale to the building. The glazing combines

a large format which is primarily horizontal in emphasis to give good transparency to internal activities including the proposed public market hall and provides opportunities for urban greening and seating. The circulation up to the main office reception is positioned at 6 m above ground via self-contained symmetrical escalators located at the north of the building entered via legible portals. This liberates the ground floor to be more permeable. These ground floor levels would introduce a new level of animation and dynamic activity on multiple floors which would transform this currently traffic dominated environment.

261. Timber triangulated soffits run through the building as a key feature and reflect the triangular bracing of the exoskeleton and introduce human scale of richness and embellishment. This intricate detail provides a softness and more intimate scale to the hypermodern architecture contrasting with the mega grid and structural columns. This motif is repeated in the winter gardens and external terraces and would be appreciated in long views.

262. The architectural finishes, materials and design detail at ground would be expressive, enticing and engaging and are driven by a purity of functionality. The façades are an integrated element designed to respond to the high sustainability requirements comprising an efficient steel structure with double glazing and single glazing to the winter gardens. Materials on the main facades are a narrow palette of metal and glazing and the substantial C-profile steel structure and glazing which complements the City skyline and assist assimilation in the overall Cluster form. The projecting main core is a metal clad system of louvres and a panels with deep channels.

263. The colour selection for the bracing system was reassessed with Officers, shifting from a dominant lighter bronze to a darker bronze-grey colour as part of a connected family of colours characterised by a common hue. This approach establishes a harmonious range of colours reflecting the building's position between the predominantly low-rise, traditional Bishopsgate Conservation Area and the taller, larger-plan developments to the south.

264. Facade maintenance and cleaning have been considered and is facilitated by two building maintenance units (BMU) located at main roof level 56. These two primary units would manage all the primary facades of the main building and these are parked within the south core when not in use. The trackway allows for either unit to be reach the whole of the main building façade providing additional capacity and redundancy. The south core has its own building maintenance unit located on top of the core and not visible in views when in a parked position and this can reach all of the primary facades of the core. Between levels 18 and 38 a portion of the core façade projects beyond the main body of the core. An additional BMU provides access to the portion of

façade which sits below the core projection. This would also be concealed when not in use.

265. Sustainability is embedded in all the design decisions including retention of the existing raft and piling. The siting and orientation passively controls solar gain with the lift core facing south and the remaining glazed facades maximise opportunities for views and natural light. With exception of the single glazing to the wintergardens the entire cladding to the office floor is double glazed. The façade has been designed to bring benefit in relation to glare whilst maximising daylight and the views out of the building. Optimisation of views and daylight have been considered fundamental factors to the façade design approach, to ensure human comfort and wellness of the occupants.

266. The architectural form would introduce a refreshingly elegant design which would enrich the 'hypermodern' architectural language of the existing and emerging city Cluster. The intelligent and high functioning engineered architecture introduces distinctive features underpinned by orthogonal geometry evidence through angled floor plates, expressive structural framing, chamfered corners, deep and impactful sequencing of terraces and wintergarden, decorative triangular soffits, a dynamic southern core and attractive active ground floor spaces. Overall, the scheme would be of an unusually cohesive and extraordinarily refined architectural quality.

Pavilion Building

Scale, footprint and architectural expression

267. This would be a unique, dedicated eight-storey cultural gateway standalone building (52.2m AOD height). Situated at the narrower western extension of the site the building would be trapezoidal in plan with the shorter edge and entrance fronting Wormwood Street and chamfers reflecting those of the main building. The building line would visually connect with the colonnade to the tall building and the scale speaks to the finer urban grain of Old Broad Street, Wormwood Street and west along London Wall which surrounds the site.

268. Locationally, the building would provide a new gateway to the City Cluster from the north, that is accessible at ground floor and highly visible from a range of pedestrian approaches.

269. The pavilion building, to be known as the 'Open Gate', would provide flexible floorspace for a range of subsidised cultural experiences. At this stage the proposition comprises Glass Gallery space for free exhibitions at ground and mezzanine, the Hall space at levels 2 and 3 would be a performance space for affordable ticketed events, and lastly the Studios at levels 4 and 5 would

host affordable creative workspaces. The public access arrangements and affordability requirements would be agreed with the City via the Section 106 Agreement.

270. The cultural centre would have a visual independence outwardly expressing its bespoke public functions. The double height ground floor would be welcoming and glazed to enable good visibility into the exhibition space and ground floor reception in the round drawing visitors and complementing the public realm and the new public amenity space beneath the main building.

271. Above this from levels 1-7 the angular glazed façade would be wrapped in a semi-transparent giant cast metal veil in the form of the Map of London, connecting people to the locality and which would be visually engaging and support cultural place making. The veil would provide flexibility to enable some visual screening but provide an enticing degree of visual permeability providing a hint of the activities within. The veil provides dynamic visual possibilities dependent upon viewing angle and scale. A substantial green wall is also proposed forming approximately 50% of the eastern façade.

272. Conditions would secure the design and fabrication of the veil to include collaboration with an artist. Additional detail would be required for the fit out once a delivery partner and operator has been secured to ensure the interior spaces are fit for purpose and can accommodate a range of activities.

Urban Design and Public Realm

273. The proposed development would create a destination for a broad demographic, with a mix of uses and activities alongside an extensive expansion of the public realm providing new direct routes to the heart of the City Cluster. It would be accessible and welcoming to all, reachable from numerous public transport interchanges with prominent and legible entrances for pedestrians and cyclists. The proposal would have excellent public transport connectivity, with many public bus, tube and train stations in close proximity and over 1,700 cycle parking spaces, thereby making it possible for a majority of visitors to walk, cycle or use public transport to access the site in accordance with Policies T1(B) and T2 of the London Plan (2021), as well as Policies CS10 (4,5), CS16 (3ii), DM10.4, DM10.8, DM16.3 of the Local Plan 2015 and Policies S8, DE2 (2), S10, AT1 (1,2,4), AT2 and AT3(1) of the emerging City Plan 2040.

274. The layout of the ground plan, with its arrangement of routes, spaces and uses would generate new activity on the prominent corner site of Wormwood Street and Bishopsgate that presently has a limited public realm at ground floor level. The proposal would see an expansion of the public realm, with a new island

site created with the inclusion of a new north west to south east route running between Wormwood Street and Bishopsgate which in turn would provide better connections between Liverpool Street Elizabeth Line station and the heart of the City Cluster. A new pocket park would be provided to the south of the site, providing additional outdoor amenity space for workers and visitors to the Cluster whilst the new pedestrian link would enable access to 55 Bishopsgate and the garden at its western boundary. The public realm has been designed to address the level change across the site, enabling step-free access via gentle ramps along the new route on the western side of the site with gradients no stepper than 1:21.

275. The routes through the site respond to pedestrian desire lines and sightlines, with new routes and enlarged pavements facilitating pedestrian movement to the entrances and around the site. The provision of cycle storage accessed within the public realm with easy access from routes around the site, and cycle lifts to the parking in the basement would prioritise the needs of active travellers and provide high quality facilities to support and encourage active travel. The routes and spaces around the site have paid particular attention to the needs of pedestrians and cyclists.

276. Bishopsgate would be opened up with a new pocket park located to the south east of the site, which has the possibility to be combined with the adjacent public space associated with 55 Bishopsgate development. This would be in addition to the new route to the west of the site, and the expanded pavements on Bishopsgate and Wormwood Street. The public realm around the site would be permeable, visually interesting, well-lit with greening and passive surveillance onto the street.

277. The positioning of the soft lift core at the heart of the main building, and the satellite core to the south of the main building enables a greater amount of available space on the primary frontages facing onto Wormwood Street and Bishopsgate to benefit from active ground floor uses providing significant amounts of animation. Furthermore, the positioning of the reception areas for the building at first and second floor enable greater amounts of space to be provided for the publicly open City Market at ground floor.

278. In terms of active frontages on the main building, two primary office entrances would be positioned on the north eastern and north western corners of the building beneath the building's promontories as perceived from major approach routes. These would form 4 storey high spaces, graced with trees, providing ample volume to contain the step-free access and escalators to the first and second floor reception areas. The prominence of the building entrances would be supported with high level building number signage, demarcating the reception areas and enhancing wayfinding and legibility.

279. The proposed City Market use which would be open to the public would dominate the ground floor of the building surrounding the soft core. This would be accessed via three entrances located on the northern, south western and southern eastern elevations of the building providing animation and activity to all pedestrian routes around the site. The entrances would be wider and open with sliding doors to enable the market to be open in the summer months, and creating a seamless extension of the public realm – further demarcated by the use of a York stone sett floor. This would also allow for spill out from the market into the external public realm. The City Market would contain a range of Food & Beverage vendors for the public to use, with aspirations of the market to operate throughout the day to meet the demands of workers and visitors to the City Cluster.

280. The immediate perimeter of the building would be defined by a multi-storey colonnade providing a weather protected route for pedestrians around the site, set behind generous landscaped planters on the northern elevation along Wormwood Street which would be dissected with pedestrian pathways – both ramped and stepped – between the building and Wormwood Street. These planters would also act as HVM, whilst on the eastern elevation large street trees would be present to provide greening along Bishopsgate.

281. The Open Gate cultural building would sit prominently on the north western corner of the site, providing a gateway to the City Cluster on the main pedestrian route between Liverpool Street Elizabeth Line Station to the heart of the Cluster. The base of the building would benefit from a double height glass gallery, providing animation and activity along Wormwood Street. The atrium space would contain art work, including a large display wall, which will be visible from the public realm at all times – the art work would be curated and changed to create a flexible and dynamic space. This is considered to help create a vibrant and interesting atmosphere in the public realm. The curation, programming and mixed-use nature of the proposals would result in a public realm which functions at different times of day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site.

282. The Cycle Hub would sit within the south western corner of the site, against 33 Old Broad Street, and would be accessed along the new pedestrian route which will run along the western side of the site. This would have glazed elements of the ground floor frontage to provide activation and animation, whilst clearly defined entrances would provide access to the long and short stay cycle parking areas at basement levels via cycle lifts. This would be complemented by the additional cycle access from Bishopsgate which would sit within the eastern elevation of the southern satellite core. A secondary

access to the cycle parking would also be provided via the service bay, further diluting the amount of cyclist movements around the site to reduce conflict with pedestrians.

283. The entrances to publicly accessible spaces of the development would be prominent and visible to passersby, with access and circulation to the City Market, Open Gate Glass Gallery and cycle storage areas have been thoughtfully positioned to be obvious and legible to users, with appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition.

284. Hostile Vehicle Mitigation (HVM) has been discreetly incorporated to the base of the tower integrated within an area of soft landscaping to the northern side of the tower, through the use of HVM compliant planters. On the eastern elevation, it is anticipated that HVM would be integrated into the structural columns of the tower which would be reinforced. Bollards would be kept to a minimum across the site, limited to safeguarding the new route on the western side of the tower. Final details would be secured via way of condition.

285. The opening up of the base of the building, through the creation of a colonnade alongside the expansion of the pavements around the site would improve Pedestrian Comfort Level (PCL) ratings from a range of F to B+, up to B+ to A+. On Bishopsgate, this has been achieved by the widening of the pavement by setting the building back from the existing building line facilitated by the creation of a colonnade. On Wormwood Street, the pavement would be extended in line with the City of London's Highway aspirations for the London Wall Corridor and would be delivered in conjunction with the developer though Section 278 agreement. Further detail on PCL's is set out within the Transportation section of this report.

286. Beyond the site frontage, pedestrian and cycle movement would increase, it is likely that the increase in pedestrian footfall generated by the development would require mitigation works to take place to Bishopsgate, a TfL road, as part of a Section 278 agreement with TfL secured through the Section 106 Agreement, any required mitigation measures would be assessed in greater detail to inform necessary works required to potentially widen footways, provide cycle lanes, revise pedestrian crossing arrangements and enhance the quality of the public realm in addition to the highway works to alter existing crossings and any other required improvements. Officers are satisfied that any necessary mitigation measures could be secured by a Section 278 agreement.

287. The overall form, massing, openness of the base of the building, disposition of public realm, detailed design and landscaping approach have been designed to optimise microclimatic conditions, including delivering optimal wind and

thermal comfort conditions, with the colonnade providing shading and protection from inclement weather, enhancing open spaces and views in accordance with London Plan Policy D3 and City Plan Policy S8.

288. The use of York stone paving in the public realm would read as a continuation of the surface treatment of the public realm found along Bishopsgate. As part of the s278 agreement, the south side of Wormwood Street in the vicinity of the site would be resurfaced in York stone, creating consistency in the design and appearance of the adjacent streets and public spaces. This would suggest to pedestrians that the space is publicly accessible, encouraging pedestrian movement around the base of the building. York stone would continue under the colonnade and then into the City Market to further give a sense of publicness of the spaces, whilst the setts would reduce in scale the deeper into the building you pass. Furthermore, 300mm wide silver-grey granite bands would run across the flooring of the site underneath the main building, reflecting the geometry of the triangular coffer soffits thus providing a playful response to the striking architecture of the building.

289. Vehicular access to the service basement ramp would be denoted by granite setts, clearly delineating the area where vehicles are supposed to go. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established within the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition.

290. The soffit treatment, columns, elevations and hard landscaping have been carefully designed to create a coordinated and harmonised look and feel for the space that responds to the unique, functional architecture of the building. The dark bronze columns with the decorative timber triangular soffit would run both internally and externally, visible within the winter gardens and external terraces at the upper floors too, to provide a cohesive and coherent finish. The columns will form part of the HVM strategy alongside the landscaping, minimising the number of bollards required around the site. The planters and seating would be made of concrete, timber and stone, with final details reserved for condition.

291. With consideration to the soft landscaping approach within the public realm, three distinctive character areas have been proposed – the Wormwood Street Colonnade, the Bishopsgate Street Frontage and the Pocket Park to the south of the building. These three distinct areas would all be tied together with the coherent hard landscaping approach, discussed above.

292. The Wormwood Street colonnade would contain evergreen ground cover on the northern elevation which would mediate the level different between the

highway and the colonnade. This area of soft landscaping would be dissected by pedestrian crossing points taking the form of both ramps and steps with the inclusion of linear seating. The crossings into the colonnade from the street would follow the triangular geometry of the host building, whilst the inclusion of street trees within the office entrance lobby would create a sense of permeability between the internal and external spaces. This landscaping approach would integrate the HVM measures to provide robust security that has dual functions with the public realm.

293. Along the Bishopsgate frontage, larger deciduous trees would be positioned along this elevation to provide greening but retain an open character to the busy footways helping to create an attractive streetscape. These would be provided in large tree pits with extensive irrigation and nutrient delivery systems. Final details would be secured via way of condition. On the southeastern corner of the site, a new pocket park would be provided with the existing Ginkgo Tree retained and providing an anchor for the space. Linear seating would be provided in this space, which is likely to be sheltered from wind, and additional trees would be planted to create an informal arrangement which would help frame new views looking toward St Ethelburga Church.

294. On the northeastern elevation of the Open Gate, vertical greening is proposed through a series of integrated planters and strainer wire systems from ground level to level 8. This planting would be shade tolerant and provide additional greening to give a more verdant character to the public space around the building. Final details of the soft and hard landscaping approach would be secured via way of condition.

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

296. As part of the submission, a concept lighting strategy has been submitted which shows that lighting would be subtly integrated into the building, chiefly focused on the public elements of the lower floors and the landscaped terraces on the eastern and western faces of the building. The proposals incorporate lighting focused on the expressive, timber, triangular coffered soffit ceilings allowing the soft landscaping to shadow. With regard to the Cultural Pavilion, the proposal includes opportunities to use lighting more creatively, including within the glass gallery on the base of the building. This has been developed

in accordance with the guidance set out within the City of London's Lighting SPD and the spatial design considerations for the City Cluster Character Area in the Corporate Lighting Strategy. Full details of the building's lighting would be secured via condition.

297. Policy DM 10.2 of the Local Plan and S8(15) of the emerging City Plan and London Plan Policy G5 requires major development proposals to contribute to the greening of by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The delivery of urban greening can be challenging for a tall building. The site is identified as an area deficient in in public open space within the London Green infrastructure map. Currently proposals include trees on Bishopsgate, planters and soft landscaping within the public realm at ground floor on the northern elevation, and an extensive vertical planting wall covering the northeastern elevation of the Cultural Pavilion. Urban greening is detailed further in the Urban Greening section of the report. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed building, and is considered to be compliant with London Plan policies D3 and D8.

298. A signage and wayfinding strategy would be required as a condition responsive to the various zones and activities across the development including private and public functions including the City Market and the Open Gate Cultural Pavilion. A wrap around sign is proposed at the top of the Cultural Pavilion to provide a prominent feature providing a striking physical presence to demarcate this new cultural hub. Proposals would be required to comply with CS 10(7), DM 10.5 of the Local Plan and S8 (23) of the emerging City Plan 2040.

299. Overall, it is considered that the proposal would optimise the use of land to deliver a transformative mixed-use destination at ground level for the use of workers and visitors to the City Cluster. It would result in a diverse mix of uses, with cultural and food and beverage offerings, with the addition of a new route between Liverpool Street Station and the heart of the City Cluster. The site would be transformed from an underutilised site, with limited ground floor animation and underwhelming public realm to a new commercial and cultural hub for the City of London. The development would deliver an improvement in both quantity and quality of new public space, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.

<u>Outdoor Amenity Space and Landscaping Design</u>

300. As part of the upper floors of the building, landscaped amenity spaces in the form of both internal and external terraces would form a key component of the offer for office workers within the building as well as forming the focal point of the promontories of the building's eastern and western elevations. The typical floor plates are setback in a rhythm that alternates between the eastern and western side of the building, providing double height landscaped spaces. As such each floor would have access to both a landscaped promontory and a setback floor with double height views of the soft landscaping and the City beyond.

301. The soft landscaping planting strategy for the proposed development is inspired by ecological succession from "bedrock" at the base of the building, through "pioneer" and "successional" planting zones on the terraces on the mid-levels of the building and "specialist" planting zone at the top. Whilst the eastern side would comprise of glazed wintergardens – including two larger lofty spaces at the top and lower elements of the building – the western side would be interspersed with six 4-storey external terraces.

302. The planting strategy for the external terraces has been developed as part of the urban greening strategy, with intensive green planting including semi-mature trees with soil beds integrated into the structure of the building to allow rot sufficient root zones. High glazed screens would ensure safety and protection from winds. Planters would be tilted and angled to maximise soil volume, whilst allowing for maximised view opportunities – with planters covering 40% of each of the external terraces.

303. The spaces would incorporate planters, fixed and unfixed furniture with paved floors to provide a range of flexible spaces that are both safe and inclusive. At Level 48, the external terraces would provide panoramic views and flexible spaces for small scale functions and events for occupiers of the building. Furter detail of landscape design including inclusive design would be secured via condition.

304. In addition to the accessible amenity spaces, the proposal would incorporate green roofs with habitat enhancements on the Open Gate (at Level 08) and the Cycle Store (at Level 03). The inclusion of these additional areas of greening are considered to be a betterment compared to the existing situation at the site.

305. Notwithstanding the approved drawings, the final details of the landscaping including full planting specifications, hard and soft materials, furniture, maintenance regime and irrigation, in accordance with the City of London Technical Toolkit, will be conditioned to ensure that the design and materials

are of a high quality, so the landscape thrives and is of acceptable design quality and is full inclusive.

Delivering Good Design and Design Scrutiny

306. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design. In respect of D4 A, the applicant's evolution of site development including amendments to the scheme at pre-application was design-led to deliver high quality design and place making and this is detailed in the Tall Building, Architecture and Urban Design section of this report. Para 137 of the NPPF 2024 requires design quality to be considered through the evolution of proposals and early discussion between applicants, local planning authorities and communities. The engagement process is addressed in detail elsewhere in the report.

307. The proposals for the site have been in development since an initial brief and competition in 2021 and the appointment of RSHP in 2022, The brief also referenced some of the City's aspirations for the site with an aim to deliver high quality place making and supporting good growth. At this initial stage, the developer's brief included the City's requirements for "a stepping down from 22 Bishopsgate" and focussed an importance of visual experiences and impacts on designated heritage assets from Waterloo Bridge and St James's Park.

308. With regard to D4 B, the pre-application process including formal meetings, workshops using visual tools and site visits 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.

309. 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.

310. The initial plan, as presented to City Officers, adopted a rhomboid form—an architectural response shaped by constraints and opportunities identified during an earlier developer-led competition. While this design addressed several contextual and feasibility considerations, wind tunnel tests, initiated at the request of City Officers, revealed significant issues with ground-level wind

conditions. These problems were particularly pronounced due to the building's proximity to the consented scheme at 55 Bishopsgate. This triggered a number of massing studies which settled on the principles of the current application which produced significantly improved wind performance but still required additional mitigation responses such as the inclusion of external sky-garden terraces and the current form of the Open Gate pavilion. Further design amendments to address heritage impacts including the raking of the upper floors to the NW chamfer and the sequencing of the terraces to the western edge were introduced.

311. Part D4 C has been met and a detailed design and access statement has been submitted.

312. In respect of D4 D, the proposals have been referred to the London Review Panel. (LRP) In addition, the applicants undertook preapplication engagement with the GLA, the Surveyor to the Fabric of St Paul's Cathedral, Historic Royal Palaces and Historic England. The LRP raised issues regarding sustainability, enhancing landscaping beyond the site, recommending a lighter structural solution to improve street level experience and further contextual integration of the cultural spaces. These comments are addressed through the officer's report in the relevant sections. In addition, the panel acknowledged the evolving nature of city views and based on the views presented found no issues with how the building sits within the Cluster. It was noted that further evaluation was required for the Waterloo view and this is undertaken in the strategic views section of this report.

313. St Paul's Cathedral endorse the good conversations at pre-application but is critical that the scheme remains unchanged from pre-application. Officers acknowledge the key design moves to massing and form as described above were undertaken at the early stages of pre-application and presented to the Cathedral team. Following changes to the rhomboid form and upper massing subsequent changes have focussed on refinements to the upper levels of the tall building including to the expressed chamfered structure to soften appearance and to the testing of colouration options and clarification of the lift core design. Through the pre-application officers also required considerable changes to the appearance and functionality of the Pavilion building, the layout and public functions at the base of the tall building and public realm design.

314. Officers consider there has been considerable optioneering and testing for the site since 2021. The final scheme proposed strikes the right balance between delivering essential long term good growth for the City and London through a tall, high-functioning and architecturally sophisticated building whilst reducing harmful impacts to heritage in a careful and proportionate way.

315. In relation to D4 E, parts 1-6, there has been a “City” level of scrutiny comprising extensive officer topic-based reviews over multiple pre-applications; 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.

316. 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 and avoid deferring large elements of the development to the conditions. The recommendation is also supported by robust relevant conditions to ensure the scheme is implemented to an exemplary standard. On F (4), the ongoing involvement of RSHP or equivalent team is secured from construction and completion stage via a S106 or informative. Overall, the application process has adhered to London Plan D4 Delivering Good Design and NPPF 2024 para 137.

Architecture, Urban Design and Public Realm conclusion

317. The proposal would achieve a rare, intrinsic elegance, the intelligent resolution of the practical constraints of the site in an unusually cohesive and finessed way. It would be of outstanding architectural quality.

318. It would represent an efficient use of land within the City Cluster, following a design-led approach that optimises the site capacity, accommodating significant growth in the core CAZ, providing employment and complementary commercial, cultural and educational uses, supported by additional public space at ground level. The scheme would represent ‘Good Growth’ by design, in accordance with the London Plan Good Growth objectives GG1-6: growth, which is socially, economically and environmentally inclusive.

319. The sophistication of the tower and companion pavilion building, coupled with the people focussed ground floor and cultural offer would create a rich, humane and intricate tall building.

320. The development is an exemplary engineered architectural response to a complicated site that has been designed with sustainably, microclimate, streets, people and spaces in mind and presents a highly innovative design solution which makes an effective use of limited resources. In the majority of visual experiences, the bulk, height, massing and quality of materials and detailed design approach are appropriate to the character of the city and will deliver a unique and theatrical addition to the City Cluster. 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.

321. The proposals would increase the quantum and quality of the public realm and landscaping around the site and include new pedestrian focussed routes with greater opportunities for sitting. The proposals would therefore enhance the overall quality and character of this section of the City.

322. The architectural and urban design drawings are of exceptional quality and annotated to provide visual clarity about the design of the development and approved use of materials. Appropriate and robust conditions are attached to ensure that the quality of the approved development is not materially diminished between permission and completion. In both cases there is compliance with NPPF 2024 para 140.

323. The architecture and urban design proposals comply with Local Plan Policies 2015 CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.8, CS16, DM16.2, CS19, DM 19.1 and DM19.2, emerging City Plan Policies 2040 HL1, S8, S1, S8, DE1-3, DE4 (1-2) and DE5-8, S10, AT1, S14, OS1-OS3, OS5 ; and London Plan 2021 Policies Good Growth objectives GG1- GG3, GG5-GG6 D3, D4, D5 and D8; NPPF 2024 paras 131, 135, 137, 136 and 140 , National Design Guide and the City Public Realm SPD all which require high-quality public realm and increased urban greening.

Townscape and Heritage

324. The relevant policies for consideration in this section are: Adopted Local Plan 2015: CS12 (Historic Environment), DM12.1 (managing change in historic environment) , DM12.5 (historic parks and gardens) CS13 (protected views); of the emerging City Plan 2040 Policies S11 (historic environment), HE1 (managing change in historic environment), HE3 (setting of Tower of London), S13 (protected views); and London Plan 2021 policies HC1 (heritage conservation and growth) , HC2 (World Heritage Sites), HC3 (strategic and local views), HC4 (LVMF) , NPPF 2024 (Conserving and enhancing the historic environment), CoL SPD Protected Views 2012 , LVMF Strategic Views SPD 2012.

Heritage information submitted and assessment of impacts

325. A comprehensive Heritage, Townscape and Visual Impact Assessment May 2024 (HTVIA) has been prepared and submitted as part of the application documents. A HTVIA Addendum dated November 2024 with adjustments and clarifications including: fully rendered AVR3 versions of views that were previously presented as wireline AVR1 illustrations; cumulative images with

fully rendered committed schemes within the City Cluster; an update to View 18 on Gracechurch Street to illustrate the adjusted colour and treatment of the service cores described within the DAS Addendum submitted separately; and an adjusted baseline photograph to View 28 LVMF 15B.1 from Waterloo Bridge close to the Westminster bank.

326. St Paul's Cathedral objects to the proposals and consider the material submitted for the heritage assessment is unsatisfactory and the City should commission their own expert opinion which it is suggested should use the Cathedrals' 'The Setting of St Paul's Cathedral its Contribution to Heritage Significance: An Analysis and Evidence Base (City Plan 2040 Regulation 19 Consultation version, June 2024)' as a baseline consideration.

327. City officers within a multidisciplinary team, including heritage and urban design experts, have undertaken independent analysis and assessments at pre-application and through to application stage to inform negotiation and amendments to reduce any arising harm as far as possible and with keen regard to the process set out in : NPPF 2024 paras 207, 208, 213 and 215; Historic England Managing Significance in Decision Taking in the Historic Environment 2015; and Historic England The Setting of Heritage Assets 2015.

328. A range of resources have been used including HTVIA visual submission, written commentary, digital tools, and desk-based analysis to understand setting, significance and impacts. At all stages of the process the detailed and rigorous assessment has been consistent with other tall buildings in equally sensitive locations and is considered to be proportionate to the importance of relevant heritage assets and level of impact and meets NPPF para 207.

329. As regards the reference to the Cathedral's Setting Study commissioned with Historic England, officers consider this to be a commendable document. However, this document is not adopted by the City nor has any public consultation been undertaken to comply with the City's Statement of Community Involvement. This document as a relevant tool therefore carries very limited weight in this case.

Strategic Views

330. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure and appropriate setting and backdrop to the Tower of London. Policy S23 of the

emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016).

331. 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).

332. 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.

333. Consultee responses and objections have been received from Historic England, St Paul's Cathedral and third-party objections, which relate to the impacts of the proposed tower on strategic views and St Pauls Cathedral and designated heritage assets in Whitehall, City conservation areas and listed buildings and these are discussed in detail below.

Tower of London World Heritage Site

OUV and Relationship to Setting

334. 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.

335. Whilst the ToL comprises a scheduled ancient monument, various listed buildings and is in a conservation area (LB of Tower Hamlets), it is considered proportionate and robust, on the circumstances of the case, to consider the impact on OUV in order to draw a conclusion on the impact on the significance of these assets.

336. 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.

337. 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.

338. 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 112 UNESCO's guidance, including the impact tables at Appendix 3 and 4, in conclusion.

339. Consultee responses have been received from Historic England, GLA and the London Borough of Southwark and in these responses no harm is identified to the WHS and ToL. LB Tower of Hamlets have issued a holding response. Historic Royal Palaces were consulted but did not respond. CoL officers acknowledge the development would be visible in some of the relevant views but also identify there would be no harm to the significance of the WHS or ToL.

340. 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 and ToL Local setting study, where the proposal would be experienced in conjunction with WHS are identified and assessed below.

LVMF 10A.1 – River Prospect, Tower Bridge (North Bastion, looking Upstream) (HTVIA View 9):

341. In this baseline view, the development would appear to the west, infilling an existing sky gap, but would be partly occluded and framed by 40 Leadenhall and 52 Lime Street at a considerable distance from the ToL. A vertical sliver of the slender core, the diagrid eastern elevation and the stepped form of the crown would be visible. The development would reinforce the emerging domed

silhouette to the Cluster following the pleasing cascade of heights from centre to periphery of the City Cluster. In cumulative scenarios the proposal would be concealed by the taller 1 Undershaft.

342. 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 40 Leadenhall and 52 Lime Street within this view and the way they would partly occlude the proposal. In this location, the proposals form, scale and massing would complement and consolidate the Cluster as a distinct skyline to form a layered roofline.

343. 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).

344. 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.

345. 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 11B.1-2 – River Prospect, London Bridge (Downstream) (HTVIA View 15):

346. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). 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.

347. The proposal would appear at the western extremity of these views. In the baseline and cumulative views, the development would be seen beyond 22 Bishopsgate framed by Tower 42 to the west. The upper half of southern elevation including the elegant core is visible. The tower sits below the ridgeline of the tallest building in the centre of the Cluster and creates a transition down to Tower 42 and the buildings lining the river bank. The proposal would visually integrate with the Cluster and consolidate its form on the skyline.

348. In baseline and cumulative scenarios, 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.

LVMF 25A.1-3 – Townscape View, Queen's Walk (HTVIA 8, A4, A5):

349. This view is also identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower and is also Representative View 10 in the LSS. The focus of the view is the ToL and a Protected Vista from 25A.1 focuses on axis with the White Tower, which also benefits from a dynamically protected sky silhouette between the 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 a core aspect of the view (para 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.

350. The proposal would appear well to the west of the view, immersed in the Cluster, infilling an existing sliver of sky and framed and largely occluded by the taller 122 Leadenhall Street and 52 Lime Street. 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, it is not considered that the proposal would undermine the composition and characteristics of the view or those landmark elements.

The south eastern corner of the vertical lift core and stepped crown would be glimpsed, reading as a sleek articulated form subtly reflecting light and shade. 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. In cumulative scenarios the proposal would be concealed by the taller 1 Undershaft.

351. 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.

Inner Ward, Tower Green and the Scaffold Site (HTVIA View 12):

352. 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.

353. These viewing experiences have been assessed in a three-dimensional model and within view 6 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 (HTVIA View 12), the proposal would be seen in the heart of the Cluster, as a sleek sliver infilling a sky gap above the Chapel, framed by 40 Leadenhall Street and 52 Lime Street. The addition would be a non-prominent feature at significant intervening distance, appearing as part of the

emerging long-established Cluster backdrop. Moving toward the Chapel, in its immediate setting from the green, the proposal and the rest of the Cluster moves out of view leaving the Chapel unchallenged and preeminent. In cumulative scenarios the development would be entirely concealed behind 1 Undershaft.

354. 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) (HTVIA View 11):

355. The LSS recognises that these views are a 360-degree experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River and, whilst under the associated guidance, seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

356. The proposal would again appear in the heart of the Cluster filling an existing sliver between 52 Lime Street and 40 Leadenhall Street and 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)(HTVIA View 13):

357. The LSS 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' the LSS 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 ToL and the City to the north and that clear views of the concentric curtain walls should be preserved.

358. From the LSS Viewpoint 2 the development would be screened by 40 Leadenhall Street. In HTVIA View 13 the uppermost part of the core would be very slightly visible behind the Port of London Authority with the existing sky gap within the Cluster. The development would be in the background centre of the emerging City Cluster. In the baseline scenario it would slightly consolidate the Cluster and in cumulative scenarios the development would be screened by 1 Undershaft. 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.

Other Views of the ToL (HTVIA View 10):

359. 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 northern pavement of Tower Bridge Approach is within Tower Bridge Conservation Area and demonstrates the relationship between the emerging City Cluster in the background and the ToL which towers over the immediate foreground. The proposal would reinforce the relationship between the two distinct urban forms – the Cluster in the background and the ToL ensemble controlling the foreground, causing no harm.

360. The proposed development would be visible within the backdrop of the view with the stepped profile contributing to the characteristic cascading of heights of the city Cluster from centre to periphery framed and partially occluded by 32 St Mary Axe and 40 Leadenhall Street. In baseline scenarios the eastern diagrid with winter gardens and the uppermost part of the slender core would be visible. The development would consolidate the composition of the existing Cluster. In cumulative scenarios the development would be entirely concealed by 1 Undershaft and Leadenhall Street. The proposal would reinforce the relationship between the two distinct urban forms – the Cluster in the background and the ToL ensemble controlling the foreground, causing no harm.

361. In the sequential kinetic approach across Tower Bridge (LSS View 9 and Approach 14), the LSS (pg. 101), also recognises the value of these views of the City and the ToL, here seen in juxtaposition. It acknowledges of particular

importance the landmark siting on the Thames ‘‘in relation to the City beyond’’, and that the view is of great diversity and character. At no point would the proposal in the kinetic experience erode silhouette or significant sky space around or behind the tower, and for most of the bridge experience would be set at a significant distance from the ToL, ensuring it still reads as a riverside gateway to the City beyond and is on the edge of, and not lost in, the City, in which it still reads as more prominent than the buildings surrounding it and its military architecture can be appreciated, in accordance with the core guidance in the LSS.

362. Overall, in baseline and cumulative the proposal would preserve the characteristics and composition and landmark elements of the view as a whole as well as the recognition and appreciation of the Strategically Important Landmarks. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would ensure that the juxtaposition between elements, including the river frontages and key landmarks any visual impacts would be negligible.

Conclusion – Impact on the Tower of London World Heritage Site

363. 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.

364. The scale of change in all instances is considered to be between negligible and neutral the magnitude of impact small, in both baseline and cumulative scenarios. 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.

365. Officers conclude the proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and

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 and HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

London View Management Framework Impacts

366. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.

367. The site is located on the north-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).

368. 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

1A.1-2, Alexandra Palace Viewing Terrace London Panorama - (HTVIA View 56):

369. This is an iconic broad and deep panorama from the northern suburbs back across the Thames basin and towards Central London. The visual management guidance (para 85) identifies the Cluster as a distant focal point allowing for orientation. The proposed development appears in background of the view, sited on the northern side of the Cluster, appearing to the right of 22 Bishopsgate and in front of 52 Lime Street and partially occluded by other lower foreground buildings. Given its position on the northern side of the Cluster, the building would be legible as a distinct element, silhouette. The tower's articulated upper levels would step down from 22 Bishopsgate, infilling the existing sky gap with 100 Bishopsgate, 110 Bishopsgate and 150 Bishopsgate, joining up the centre of the Cluster with the eastern periphery and giving the Cluster form a greater three-dimensional quality. The light materiality of the building's envelope would aid its integration into the Cluster to the south, albeit the contrasting frame would help to accentuate the development.

370. In the cumulative scenario, the City Cluster would expand quite considerably to the east and west of the Proposed Development, with 1 Undershaft becoming the new centrepiece and apex at 73 storeys. New tall buildings to the east and west of the site would reinforce the symmetry and compositional quality of the Cluster. The proposed development would retain its central and largely unobscured position within the Cluster.

371. In baseline and cumulative scenarios, the proposal would support the aim of para 87 that new tall buildings consolidate and improve the composition of existing Clusters of tall buildings, sharpening the distinction between lower density residential of the mid-ground and the background higher density character of central London. In consolidating this townscape element, in line with para 90, the proposal would manage the transition down to St Paul's Cathedral as the SIL, releasing growth pressure on the intervening unspoilt distant horizon of the Kentish and Surrey hills (South London) and on a clear day, the North Downs, thus preserving and enhancing the viewer's ability to recognise and appreciate St Paul's. The proposal would allow for the consolidation of an important Cluster of tall buildings in accordance with para 57 of the LVMF SPG.

372. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and The Shard. It would also leave unaffected views of other identified features: the Caledonian Market Tower, Canary Wharf, Broadgate Tower, the London Bridge Cluster, St Pancras Station and the Euston Tower. It would create a new feature of interest in its own right and contribute to the overall visual consolidation of the City Cluster as identified within the view.

373. In baseline and cumulative scenarios, the proposal would result in a minor enhancement to the view.

2A.1-2 and 2B, Parliament Hill London Panorama (HTVIA View 57)

374. Parliament Hill from the summit and east of, is another famous strategic panorama of London from one of its best-known peaks. As at Alexandra Palace, given the wide span and depth, the consolidation of significant tall buildings into Clusters assists the viewers orientation, understanding and ultimately appreciation of the view.

375. In baseline scenarios the development would be visible as a distinct but prominent element on the left of the City Cluster, partially filtered through foreground trees. Its scale, mass and form would appear consistent among the existing tall buildings of the City descending in height from the top of the

Cluster at 22 Bishopsgate. The stepped upper levels contributes to the building's slender and elegant profile, its upper half is experienced against a clear sky background. The locationally the development would partially infill the existing sky gap between 22 Bishopsgate and 100 Bishopsgate, 110 Bishopsgate and 150 Bishopsgate and would give the Cluster a greater three-dimensional quality.

376. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft and 55 Bishopsgate and its distinct silhouette would remain prominent whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular Cluster form. It would reinforce the central axis of the Cluster, from which it would fall away on all sides, creating a legible and attractive skyline form.

377. In baseline and cumulative scenarios, the siting of the proposal in the City Cluster means there would be no impact on the protected vistas towards the two SILs, St Paul's and the Palace of Westminster. Para 96/106 recognises the contribution of the City Cluster demarcating the financial district and governmental centre of London. As identified (para 97), like the Shard on the opposite side of London Bridge, the Cluster assists the observer in recognising and isolating St Paul's Cathedral whilst the consolidation of tall buildings allows for an appreciation of it in its wider backdrop of the rolling Surrey/Kent hills and its prominent place in the wider Thames basin, which the guidance identifies as framing the silhouette of the city (para 96). The proposal would allow for the consolidation of an important Cluster of tall buildings in accordance with para 57 of the LVMF SPG.

378. Baseline and cumulative experience would leave unaffected views of other identified features: the Caledonian Market Tower, Canary Wharf, Broadgate Tower, the London Bridge Cluster, St Pancras Station and the Euston Tower. From 2 B 30 St Mary Axe would be occluded, this would not fundamentally change the characteristics and composition of the view; it would represent the ongoing evolution and consolidation of one of the most distinctive elements of the view. The development would create a new feature of interest in its own right as part of the existing Cluster and would enhance the overall silhouette of the Cluster. As such, in baseline and cumulative scenarios, in this view the proposal would preserve characteristics and composition of the view overall.

379. In baseline and cumulative scenarios, the proposal would preserve the views.

3A.1, Kenwood at the viewing gazebo London Panorama (HTVIA 58):

380. This is another Hampstead Heath view from one of the finest historic homes in North London. Given the pre-eminence of the gentle and verdant fore and middle ground of the Heath, an appreciation of the great depth of an otherwise framed view of central London is dependent on tall built form breaking the distant North Downs. As such, the City Cluster is an eye-catching strong orientation point and complementary feature in an appreciation of the composition and characteristics of the view. The siting of proposal in the City Cluster means there would be no impact on the protected Vista towards St Paul's, or on a recognition or appreciation of the Palace of Westminster as the other SIL.

381. In baseline experiences the proposed development would be a noticeable addition to the visual experience from the location of the former viewing gazebo, the slender form of the tall building sited to the east of 22 Bishopsgate and would occlude 30 St Mary Axe (identified not as a landmark, but 'also in the view') but serve to cascade down in height towards 110 Bishopsgate further to the east. As in other long-distance views towards the site, the proposed development would be prominent as a distinct element within the view. The stepped and elegant silhouette of the building's form and unobscured visibility of the upper half of the tower would be experienced against a clear sky background, with a narrow sky gap separating the development from 22 Bishopsgate to the west, which would expand or contract dependent on the viewpoint although the individual forms of each building would remain clearly legible as part of an overarching whole.

382. There would be no impact on the protected vistas towards the two SILs, St Paul's and the Palace of Westminster. Like the view from Parliament Hill in cumulative scenarios the development would continue to step down from 1 Undershaft and 55 Bishopsgate. The presence of 1 Undershaft, the tallest within the City Cluster, would infill the sky gap between 22 Bishopsgate and the development would no longer seen against a clear sky background to the west. However, the proposed development would remain prominent in the view as it is located on the northern side of the Cluster and the upper part of the building's northern elevation would remain unobscured

383. The proposal would assist the consolidation of the conical City Cluster as a distinct and coherent urban skyline form, assisting in drawing out that arresting contrast between the semi-rural parkland and the modern commercial core of central London rising above and beyond, as identified in the visual management guidance (para 116). The consolidation of tall buildings here frees the wider backdrop hills to accentuate an appreciation of St Paul's and its strategic location in the wider Thames Basin (para 121). The distinction of a singular Cluster form avoids the visual confusion caused by ad-hoc tall

buildings which undermines the recognition and appreciation of the Palace of Westminster (para 118).

384. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. The proposal would allow for the consolidation of an important Cluster of tall buildings in accordance with para 57 of the LVMF SPG.

385. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and the Shard. It would also leave unaffected views of other identified features: the Broadgate Tower, Guy's Hospital, Centre Point and Euston Tower.

386. Whilst 30 St Mary Axe is identified in the view and referenced para 117 and would be occluded, this would not fundamentally change the characteristics and composition of the view; it would represent the ongoing evolution and consolidation of one of the most distinctive elements of the view. The development would create a new feature of interest in its own right as part of the existing Cluster and would enhance the overall silhouette of the Cluster. As such, in baseline and cumulative scenarios, in this view the proposal would preserve the characteristics and composition of the view overall.

4A.1-2, Primrose Hill summit, London Panorama HTVIA View 59:

387. This a small foothill in the initial climb up the North London hills, it is a popular destination just north of Regent's Park affording a spectacular panorama of central London seen in close detail. The siting of proposal in the City Cluster means there would be no impact on the two Protected Vistas towards St Paul's and the Palace of Westminster, the SILs.

388. The proposed development would be a prominent addition to the view, sited just to the east of No. 22 Bishopsgate. The upper half of the building would be seen against a clear sky background which in time is likely to narrow with future development. The stepped profile, elegant proportions and slenderness of the proposed tower would be clearly appreciated in this view. The lightness of its architectural materiality and varied northern elevation would provide an attractive contrast to the more muscular form of 22 Bishopsgate. The proposed development would obscure 100 Bishopsgate and provide a clear step down from the tallest element of the Cluster to 110 Bishopsgate on the eastern side of the Cluster which would consolidate the conical compositional quality of the Cluster on skyline.

389. The City Cluster is identified as a complementary feature of the view, where it is identified as somewhat screened by towers at Euston (para 129), standing in contrast to the lack of order or coherence of the mix of larger commercial and residential buildings in the middle ground (para 128). The scale of the development would be compatible with the composition of the view and would consolidate the City Cluster of tall buildings as an existing landscape feature in accordance with para 130 of the SPG. This would assist in differentiating it from the consolidating Isle of Dogs Cluster in the background, assisting in an appreciation of the scale and depth of London. Due to the location within the Cluster would not change or affect an appreciation of St Paul's in the view.

390. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, 55 Bishopsgate, and to the lower 110 Bishopsgate. The distinct northern elevation would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular Cluster form. The proposal would allow for the consolidation of an important Cluster of tall buildings in accordance with para 57 of the LVMF SPG.

391. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the identified landmark elements: the BT Tower and the Shard. It would also leave unaffected views of other identified features: Canary Wharf, University College Hospital, Centre Point, Westminster Cathedral and the Euston Tower. It would create a new feature of interest in its own right and contribute to the overall visual consolidation of the City Cluster as identified within the view.

392. In baseline and cumulative scenarios, the proposal would result in a minor enhancement to the view.

5A.1-2, Greenwich Park General Wolfe Statue London Panorama: HTVIA View 60

393. This is a seminal London view of great historical significance allowing one of the most comprehensive views of the Capital. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (5A.2).

394. The proposed development would be a prominent addition to the view from Greenwich Park, the upper half of the building appearing against a clear sky background within the central part of the City Cluster backdropping 30 St Mary Axe and 100 Bishopsgate. The new building would provide a clear and legible transition between 22 Bishopsgate at the centre of the Cluster and down to

The Gherkin and lower towers to the east of the site create a transition in scale down from the proposed development and reinforcing the conical composition of buildings viewed against the skyline. The development would be clearly defined from other towers within the Cluster, whilst assisting in consolidating the Cluster as a distinct, singular skyline form. The stepped profile, lightweight materiality and diagrid elevations of the proposed development would soften its appearance within the view, contrasting with other more muscular and d constructions in the Cluster.

395. In the cumulative scenarios, 1 Undershaft and 55 Bishopsgate would bridge the gap between the development and 22 Bishopsgate. This would temper the prominence of the proposed development in the view, although its form would be integrated more subtly into the Cluster. As a tall building, the development would remain legible in the view, its southern elevation fully unobscured. The proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The distinct stepped silhouette of 99 Bishopsgate would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular Cluster form. It would reinforce the central axis of the Cluster, from which would fall away on all sides.

396. The proposal would accord with para 146 of the SPG, which recognises that the composition would benefit from the further incremental consolidation of the City Cluster of tall buildings, consistent with the general want to consolidate tall buildings at para 57, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.

397. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the identified landmark elements: the Monument, Tower Bridge, Millenium Dome and the Greenwich Observatory. It would also leave unaffected views of other identified features: Canary Wharf. It would create a new feature of interest in its own right and contribute to the overall visual consolidation of the City Cluster as identified within the view.

398. In baseline and cumulative scenarios, the proposal would result in a minor enhancement to the view overall.

6A.1 Blackheath Point, London Panorama - HTVIA View 61

399. This panoramic viewpoint is on high ground of historic strategic importance on a historic route from the Kent coast and the continent and would have been the first sighting of the skyline of the Capital. The siting of the proposal in the

City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL. Tower Bridge and The Old Bailey (6A.1).

400. The proposed development would be a noticeable addition to the view from Blackheath Point, the building appearing against a clear sky background within the central part of the City Cluster and occluding 30 St Mary Axe. The building would be clearly distinguished from 22 Bishopsgate and positioned to the east. The new building would provide a clear and legible transition in scale stepping up to 22 Bishopsgate at the centre of the Cluster and down to 110 Bishopsgate and the lower towers to the east. This would contribute to creating a more consolidated and coherent composition of buildings. The stepped silhouette, elegant and slender skyline profile would be appreciated as part of a more coherent Cluster form. The lightweight materiality of the proposed development would soften its appearance within the view and provides a contrast to more muscular profiles in the Cluster, with which it would have a familial relationship.

401. In the cumulative scenarios the clear sky gap to the west would be infilled by 1 Undershaft and 55 Bishopsgate. The building would remain distinguishable with a clear roof silhouette and the southern elevation would remain prominent above the but across this distance the proposed development would not be less readily discernible. The proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft. The development would bring a new distinct silhouette to the Cluster whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular Cluster form.

402. As at Greenwich, the development would assist in the consolidation of the City Cluster as a coherent skyline form assisting the composition and characteristics of the view overall and would contribute positively to the conical form and family of very tall buildings. The proposal would be consistent with the general objective to consolidate tall buildings at para 57, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.

403. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the identified landmark elements: Tower Bridge, the Old Bailey and the Shard. It would also leave unaffected views of other identified features: St Paul's Church (Deptford), Guy's Hospital and Canary Wharf. It would create a new feature of interest in its own right and contribute to the overall visual consolidation of the City Cluster as identified within the view.

404. In baseline and cumulative scenarios, the proposal would result in a minor enhancement to the view overall.

River prospects

405. The development is some distance from the river but the magnitude of change and potential impact to River Prospect views is greatest in westerly views. River Prospect views 10A.1, 11 B1 and 2 and 25A.1-3 have been assessed above, the remaining relevant views are identified and assessed below.
LVMF 13 A- B.1 River Prospect - Millennium Bridge - HTVIA View 36

406. This stretch of the river has a distinct character being directly opposite the St Paul's Cathedral as the Strategically Important Landmark and is one of best places to appreciate the Cathedral at close quarters. The Cathedral dominates the middle ground of the view, where the architectural details and embellishment and cornice line can be enjoyed. The monumental silhouette rises above a low horizontal skyline of the wider 'Wrenscape' skyline of steeples and spires. The City Cluster is peripheral to the right of the view where Tower 42 is just visible.

407. In baseline scenarios the proposal would be on the extreme eastern periphery of the views and would complement and contribute to the development of the existing and emerging Cluster of tall buildings. The southern and western elevations of the development would be visible in the background of the view, with the detail of open terraces legible from this distance to the site and the quality of the design suggested. The form would be appropriate in the background of the view, with the sculptural principal cores and slope of the western edge articulating a subtle step down within the City Cluster, from 22 Bishopsgate to the Stock Exchange Tower and Angel Court beyond its edge. Light would glance off this sloped edge and its terraces would be partially transparent, with trees and structure seen in silhouette, softening this defining western edge of the City Cluster.

408. The proposal would be clearly within the City Cluster and detached from the context of the Cathedral. There would be no impact on the skyline character, elements within the view and the Cathedrals dominance and details would be preserved.

409. In the cumulative context, the City Cluster would be expanded and new tall buildings on the eastern and southern sides of the Cluster serve to bridge the visual gap between the main body of the Cluster and the 52 Lime Street and 20 Fenchurch Street. The core of the proposed development would be partially obscured by 55 Bishopsgate. The Cluster would be further consolidated to the

west and the distinction between the low scale of old historic City and the modern city Cluster would be maintained.

410. The proposal would preserve the townscape setting of the Cathedral whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 228-237 and 57 of the SPG.

LVMF 15B.1-2 – River Prospect, Waterloo Bridge (Downstream) - HTVIA Views 28 ,29, 30 and 31:

411. LVMF 15B comprises two assessment points, 15B.1 and 15B.2 and the kinetic experience between them. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. The Cathedral is identified as the SIL. There is a clear, long-established relationship between the Cathedral and the City Cluster as two distinct forms with space between them which is integral to the composition as a whole. The Cathedral the pre-eminent monument with clear sky around it, rising above, atop Ludgate Hill, within a lower riparian setting of historic buildings and landscapes. The modern tall buildings of the City Cluster form the background to the right, demarcating the modern central financial district. An important characteristic of the City Cluster in these views is it rises gradually in height from its north-western corner in deference to the Cathedral.

412. Consultees particularly focus on the harmful impacts to the Cathedral in this LVMF view sequence. Whilst officers concur that harm would be caused, there is disagreement as to the nature, scale and severity of that harm; officers have sought to mitigate these adverse impacts as far as possible through securing design changes to the leading edge as discussed earlier in the report.

413. Historic England strongly objects to the proposal due to the harm to the significance of the Cathedral which is addressed elsewhere in the report but draws attention to LVMF 15 B.1 where the proposals would create a new profile for the Cluster abruptly rising from Angel Court resulting in a cliff edge noticeably higher than the overall height of the Cathedral with a chamfered form offering little mitigation. Historic England state, in respect of the guidance specific to the Waterloo Bridge views, that the proposals would not maintain the visual prominence of the Cathedral and would instead dominate it.

414. St Paul's Cathedral objects to the impact on this and other strategic views, contending that the proposals do not accord with the long-managed objective for the Cluster to have a central high point with heights reduce down to the Cathedral with an established "stand-off" and space between the Cluster and the Cathedral. Furthermore, the Cathedral contend that the height and massing add to the obtrusive presence of the City Cluster in this and other

views with the edge condition creating a sheer drop rather than a designed form. The Cathedral further contend that the effect of the development to unacceptably erode the clear sky gap between St Paul's and the City Cluster and that the proposals are at odds with the LVMF guidance by pulling the City Cluster closer to St Paul's and not preserving the clear sky background. The Cathedral consider the development to unduly dominate the dome when understood cumulatively and the massing "aggressive" with the impacts most harmful in LVMF 15 B.1-15 B.2 generating a negative impact on the character of the view and the balance between the Cathedral and the City Cluster.

415. The GLA state that despite design amendments the proposals would appear closer and higher than the Cathedral and detract from its primacy.

416. Officers have assessed the impact and reach different professional conclusions. Officers concur that there would be a slight adverse impact to the Cathedral in the momentary viewing experience from 15B.1 to 15B.2 but consider that the objections overstate the scale, extent and severity of this harm.

417. As existing, the Cathedral is seen largely with a clear sky space and backdrop to the left. To the right, the character of the composition is different with a clear back drop but reduced sky space around the Cathedral, with buildings stepping up in height from Angel Court and then rising to 150 Bishopsgate, Heron Tower (110 Bishopsgate, 217m AOD; identified as 'also in the view' by the SPG), 100 Bishopsgate and Tower 42 (199m AOD) rising approximately to the height of the Cathedral's surmounting cross and ascending to the apex formed by 22 Bishopsgate (294m AOD).

418. For clarity, the proposal would not make contact with the Cathedral's silhouette, or occupy any of the clear sky space which frames it, at any point in this viewing experience. Rather, the proposal would be a new tower in the existing Cluster, visually (but not physically) close to the Cathedral in the viewing experience because of its site on the north-western corner of the Cluster.

419. In the proposed, baseline viewing experience (i.e. 15B.1-2), the proposed scheme would appear in front of the Heron Tower and adjacent to Tower 42. It would appear a little higher than these two existing towers and considerably lower than 22 Bishopsgate, the current apex of the Cluster. Officers consider that the proposal would therefore be of a scale and height commensurate with its position at the edge of the Cluster. This would differentiate it from the consented scheme at 55 Bishopsgate which is closer to 22 Bishopsgate in height and therefore of a scale more commensurate with the Cluster's centre. Nevertheless, the scale of this proposal would mean that there would be an

abrupter transition in scale between the Cathedral and the Cluster's centre compared with the existing condition. Crucially, though, this abruptness would be very substantially mitigated by the proposal's deferential raking edge.

420. As the proposal would be of a scale that mediates between that of Tower 42 and 22 Bishopsgate, it would better articulate the overall skyline of the Cluster when seen from here. Further, it would introduce a highly crafted western edge which would better finesse, define and more tightly contain the City Cluster, reinforcing the character of the view in which the modern Cluster is juxtaposed with the historic and iconic Cathedral; the river frontage would remain recognisable and easily understood. The development would successfully key into the established modern backdrop and the spatial and built components which contribute to the appreciation of the overall composition and public enjoyment would continue and there would be no conflict with LVMF para 261.

421. However, by infilling some more clear sky to the right of the Cathedral, and increasing the scale of built form nearer to it in the view (visually, but not physically), the proposal would slightly unbalance the composition and in doing so momentarily reduce the overall visual prominence of the Cathedral, contrary to paras 264, 266 and 267 of the SPG. Officers consider this adverse impact is most noticeable at viewpoint 15B.1, where the juxtaposition between the proposal and the Cathedral is acutest, and that it reduces closer to the midpoint 15B.2 and subsiding entirely as the viewer crosses the Bridge and moves out of the LVMF sequence as the Cluster moves away from the Cathedral, opening up the strategic skyline gap.

422. Officers further consider that the design of the proposal has sought to clearly mitigate and minimises these momentary adverse impacts. There would be a distinct softening of the leading edge towards the Cathedral which has been central to the architectural approach. The articulated silhouette of the projecting principal cores and slope of the western edge further reinforce a sense of diminishing and transitional building height and would be in tune with the vertical character of Tower 42. The sequence of open terraces would feather the building edge through the interplay of geometry, structure, vegetation, and layered glazing and from Waterloo Bridge, and this would bring a lightness and semi transparency to the verticality.

423. Crucially, the springing point of the raked edge is set deliberately to a point approximate to the base of the Cathedral's lantern, in a way that very clearly acknowledges and defers to the visual primacy of the Cathedral in this viewing experience. Officers further consider that the visual proximity between the Cathedral and the proposal at this acute point, 15B.1, is offset by the sheer physical distance between the two (over 1,000m) and the clearly modern architectural language of the proposal. The viewer would perceive a new tower

in the Cluster closer to the Cathedral, but would clearly discern that the two entities are separate with their own visual identities; the instant recognisability and international fame of the Cathedral would ensure it continued to command the view; the ability to recognise the Cathedral and its visual prominence would therefore remain. However, there would be a slight impact on an appreciation of the Cathedral, contrary to para 267.

424. The lower height and asymmetrical articulated profile would negate any sense of isolation or formation of a secondary 'sub-Cluster', unlike officer conclusions for the much taller and singular 55 Bishopsgate in the baseline experiences (22/00981/FULEIA). Instead, the lower height and form proposed for 99 Bishopsgate readily complements other tall buildings to the right of the apex and introduces a greater equilibrium which directly relates to the existing Cluster form flanking 22 Bishopsgate and balancing against 6/8 Bishopsgate and 122 Leadenhall Street and so complies with LVMF para 263. Keying into the established modern backdrop in this manner would preserve the balance of spatial and built components which contribute to the overall composition of the view and there would be no conflict with LVMF para 262: the river, treelined embankment, clear backdrop to the Cathedral dome and western towers and historic buildings in the foreground.

425. In the cumulative scenario, the proposal would appear alongside the taller and distinct consented form of 55 Bishopsgate. Officers identified that this scheme would cause harm to the Cathedral in baseline and cumulative scenarios through its impact on the sky gap, its sense of singularity in height which was more akin to the existing apex at 22 Bishopsgate, and which resulted in a new centre of gravity or 'second apex' being created.

426. Whilst the proposed development of 99 Bishopsgate would erode the sky gap a little further due to its siting on the western fringe this scheme is lower than 55 Bishopsgate and the nuanced stepped height, raked crown and feathered edge temper impacts to ensure this tall building is far more deferential to the Cathedral than the more assertive scheme at 55 Bishopsgate. In relation to the composition of the Cluster, the proposal would in fact positively reinforce the stepping down in height from 1 Undershaft and 22 Bishopsgate towards the development site and subdue the sense of isolation created by 55 Bishopsgate, serving to pull the developments back into the Cluster and re-orientating centre of gravity to the apex. The further Cluster expansion and new tall buildings on the eastern and southern sides of the Cluster also serve to bridge the visual gap between the main body of the Cluster and the 52 Lime Street and 20 Fenchurch Street and collectively these all positively contribute to a more considered and composed City Cluster.

427. The LVMF guidance states that new development should not dominate the Cathedral or compromise its relationship with the clear sky backdrop. The proposal would do neither; it would slightly alter its relationship with its clear sky backdrop in a specific viewing experience. The guidance also states that development in the Cluster should be of an appropriate height and of high architectural merit (para 263). Officers consider, in itself, the proposed tower is an attractive skyline feature of good design, and that the stepping down in height from the apex makes a response to the overall form of the Cluster. Officers consider the proposal would comply with para 263 of the guidance. Further, officers consider that the proposal would preserve the overall characteristics and composition of the view, being within the defined Cluster and located at a point in the view where tall buildings are already seen near to the Cathedral, the tower is also positioned on the right and so removed from any potential canyoning effect to the left of Cathedral and so in compliance with this part of para 264.

428. While the proposal would not affect the clear sky silhouette, nor interact with the dome or the ability to recognise the commanding SIL, the development would impinge on the quantity of clear sky setting to the right when seen in the viewing experience to 15B.1 -15B.2. This would momentarily alter the Cathedral's relationship with its clear sky setting and its sense of visual prominence, in conflict with parts of para 264 and 266-267 of the LVMF SPG. Officers concur with objectors in part that the closing of this integral strategic sky gap would cause some erosion of the characteristics and composition of the view, as a whole, but this impact would be momentary and slightly diminish the ability to appreciate, more than recognise, the Cathedral as the SIL.

429. The essential character of the view (THVIA 31) would be retained at nighttime, with the contrast between the modern towers within the City Cluster and the illuminated dome and peristyle of the Cathedral. The river itself provides a layer of darkness animated with pockets of light which contrast with the geometric forms of the buildings as they rise above the riverbank. The proposal has been designed to minimise light pollution and would be secured in detail via condition, including aviation lights. There would be no other form of external lighting that would be visible in these views. The development has been designed in accordance with the details and technical requirements of the draft Lighting SPD and the Corporate Lighting Strategy. Overall, lighting would be managed to ensure the development would not command the focus in the City Cluster or distract unduly from other elements of the composition.

430. Although the proposal would conceal Heron Tower which is identified as "also in the view", officers consider that the proposal would preserve the characteristics and composition of the view overall: it would still allow for the juxtaposition between important elements, such as the Cathedral and the

historic riverside setting (Temples, Victoria Embankment, the Monument and Wren Churches), and those other key landmarks so that they could still be appreciated in their London context.

431. However, the proposals would fail to accord with the guidance and parts of paragraph 264 and 266-267 as there would be a slight diminishment of the viewer's ability to appreciate the SIL in LVMF 15B.1-15B.2 of the LVMF SPG.

LVMF 16B.1-2 – River Prospect, the South Bank: Gabriel's Wharf Viewing Platform - HTVIA View 34 and A14:

432. The view comprises two Assessment Points located close together on the viewing platform both orientated towards St Paul's Cathedral. The Cathedral is identified as the Strategically Important Landmark (SIL) and the guidance identifies the City Cluster as a group of tall buildings in the east of the composition. The Oxo Tower is a landmark in the view and Temple Gardens, St Brides Church, Unilever House, Tower 42, 30 St Mary Axe Heron Tower, IPC Tower are also in the view.

433. The viewing platform provides a distinct view position from which to appreciate the Cathedral and its wider setting. The Cathedral is particularly dominant in the view and is appreciated at close quarters, its principal features and detail appreciable. The immediate setting is safeguarded by St Paul's Height limitations. Tower 42 and the City Cluster forms the skyline in the east which has expansive sky separation from the Cathedral. The river dominates the foreground, while the middle ground consists of mature trees leading from Temple towards the buildings on the Embankment near Blackfriars Bridge. Buildings between these provide a rich and intricate skyline and there is a transition in scale from the Westminster section to the City section further east.

434. St Paul's Cathedral in relation to this strategic view comments that the proposed massing would be aggressive and identifies a negative effect on the balance between the cluster and the Cathedral.

435. In baseline scenarios the proposal would contribute to the City Cluster, introducing a distinctive feathered edged and raked profiled as an elegant tall building defining the westernmost edge. The proposal would assist in the long-term consolidation of the Cluster composition as a more singular skyline set piece. Although the proposal would bring the taller elements of the Cluster closer to the Cathedral and would reduce the existing substantial sky gap the impact is reduced due to the orientation and distance and it is considered that the proposal in this visual experience would retain primacy of the Cathedral, and the proposals would accord with para 280, 281 and 283 of the LVMF,

preserving the character and composition of the townscape setting of the Cathedral.

436. In cumulative scenarios, the City Cluster would consolidate further into a singular from separate from the Cathedral. The development would be visible behind 55 Bishopsgate, extending the edge of the City Cluster to the left and obscuring developments beyond, on the eastern side of Bishopsgate. In this cumulative view, the principal cores would ease the step up to 55 Bishopsgate. The other emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels would remain unobscured and the distinction between the low scale of historic city and the modern City Cluster would be maintained.

437. In baseline and cumulative scenarios, the proposal would not affect the primacy of the Cathedral's clear sky silhouette, clear sky setting or impact on ability to appreciate the three -dimensional qualities and architectural details of the SIL and this approach is consistent with. The development would assist in the consolidation of the western edge of the City Cluster as a coherent skyline form assisting the composition and characteristics of the view overall and would contribute positively to the conical form familial, singular character of the Cluster. The proposal would be consistent with the general exhortation to contribute to the development or consolidation of Clusters of tall buildings that contribute positively to the cityscape at para 57 of the LVMF SPG, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.

438. The proposal would also preserve the characteristics and composition of the identified landmark elements, and those key landmarks so that they could still be appreciated in their London context St Paul's Cathedral and The Oxo Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting so that they could be appreciated in their London context. It would create a new feature in its own right.

439. Officers reach a different professional conclusion to the Surveyor to the Fabric of St Paul's Cathedral and conclude the proposal would preserve the townscape setting of the Cathedral whilst not detracting from wider landmarks, all in accordance with the visual management guidance at paras 280-283 and 57 of the SPG.

LVMF 17B.1-2 – River Prospect, Golden Jubilee/Hungerford Footbridges (Downstream) - HTVIA View 26 and 27:

440. LVMF view 17B.1 and 17 B.2 is a kinetic viewing experience between the two Assessment Points from the Golden Jubilee / Hungerford Footbridges looking downstream with the Cathedral as the Strategically Important Landmark the centrepiece of the view and composition. The footbridge provides enhanced viewing experiences to the east owing to the elevated viewing location. The LVMF guidance identifies the setting of St Paul's Cathedral within the view as the singular most important structure which should be preserved or enhanced. Para 300 of the LVMF SPG identifies Clusters of tall buildings either side of the Cathedral including the City Cluster and para 302 states new development should strengthen the composition of the existing Clusters.

441. St Paul's Cathedral in relation to this strategic view again comments that the proposed massing would be aggressive and identifies a negative effect on the balance between the cluster and the Cathedral.

442. This view is more distant than LVMF15B.1-2, but the siting and orientation of the proposed development in baseline scenarios would be prominent in the view, slightly reducing the sky gap between the Cathedral and the Cluster and creating a more assertive edge although mitigated by the stepping down from 22 Bishopsgate. The proposal would also introduce an elegant new tall building to the City Cluster composition and reinforce the presence of the Cluster on the skyline. The southern and western elevations of the development would be visible, with the form of the principal cores and slope of the western edge articulating a step down to the existing development of Angel Court to its left. Buildings beyond the site including Heron Tower and 100 Bishopsgate would be obscured, with the development introducing a more consistent and defined edge.

443. As above at Waterloo Bridge, the siting, form and feathered and raked appearance relative to the Cluster would mitigate the harmful impact of the development but would not remove harm entirely. Again, in cumulative scenarios, the City Cluster would consolidate further into a singular form, separate from the Cathedral. The development would be visible behind 55 Bishopsgate, extending the edge of the City Cluster to the left and obscuring developments beyond including Heron Tower, on the eastern side of Bishopsgate. In this cumulative view, the principal cores would ease the step up to 55 Bishopsgate. Other emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels would remain unobscured and the distinction between the low scale of old historic City and the modern city Cluster would be maintained.

444. It is recognised that the proposal slightly diminishes the existing strategic sky gap which is integral to the composition as a whole. In this case the diminishment in the sky gap and relative scale relationship would not be as

significant as in LVMF 15 B.1-2. due to the distance and orientation. However, there would be some slight change in the balance of the overall composition and a slight reduction of the sky gap resulting in a monetary diminishment of an appreciation, more so than a recognition, of the Cathedral as the SIL. To this end, it would conflict with para 301 of the LVMF SPG, which seeks to preserve the setting of St Paul's (as the singular most important structure within the view). The proposals would strengthen the composition of existing Clusters of tall buildings and comply with para 302. The development is assessed to be of high quality and would strengthen the City Cluster as part of the composition of the view and as a tall building would be grouped with eastern Cluster of tall buildings in the City and so comply with para 304 and 305.

445. Otherwise, the proposal would preserve the characteristics and composition of the identified landmark elements other than concealing Heron Tower as an element "Also within the view". It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.

446. However, the proposals would depart from the guidance in para 301, consistent with the position taken for 55 Bishopsgate. This conflict with LVMF guidance has also been identified by the Surveyor to St Pauls Cathedral.
LVMF 19A.1-2 River Prospect, Lambeth Bridge (downstream) - HTVIA View A11

447. This is a kinetic sequence between the two Assessment Points, with the focus of the view the Palace of Westminster, the SIL, alongside other landmarks including Westminster Abbey, Victoria Tower Gardens, Whitehall Court, the London Eye, Westminster Bridge and Lambeth Palace, whilst 30 St Mary Axe (the Gherkin) and Tower 42 in the City Cluster as also identified as positive features. The visual guidance describes the juxtaposition between the greater intensity of buildings north of Westminster Bridge and in the CoL as secondary to the 'semi-pastoral' setting of the World Heritage Site (para 332), while the distant Cluster makes for a deep view (para 333), allowing for a strong appreciation of the geography of London, and a juxtaposition between the political and commercial centres of the Capital.

448. The proposed development in baseline and cumulative scenarios is a discrete but noticeable feature in the view, defining the left of the Cluster with the upper third of the building set against a clear sky background above the roofline of Tower 42 and concealing 100 Bishopsgate within the City Cluster. The proposal would assist in the consolidation of the City Cluster into a coherent

skyline form with a stronger identity, in accordance with the aim to consolidate existing Clusters in the visual guidance (para 57).

449. The proposal would preserve the characteristics and composition of the identified landmark elements and would still allow for the juxtaposition between important elements, such as the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.

450. The proposal would preserve the townscape setting of The Palace of Westminster whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 334-338 and 57 of the SPG.

Townscape views

LVMF 26A.1 Townscape St James Park Bridge: (HTVIA View 23 and 24)

Objections from Historic England and GLA

451. LVMF View 26A.1 is a single Assessment Point from just south of the centre point of the 'Blue Bridge', orientated towards Horse Guards Parade and the central foreground fountain and the Foreign and Commonwealth Office between the 'pivot' of the central 'Duck Island'.

452. This view is quintessentially picturesque and derives its character from the high-quality landscaped setting of St James's Park relative to the groups of buildings. The foreground and middle ground are dominated by the lake and surrounding parkland. The densely foliated Duck Island is in the centre of the view with two groups of buildings with distinct architectural characters either side experienced between trees. To the left is the skyline of spires and pinnacles of Horse Guards and Whitehall Court (grade I and II*), identified as landmarks in the view, as well as the Old War Office (grade II*, although not identified in the view). The Foreign and Commonwealth Office (grade I) and the Shell Centre are also landmarks, alongside the London Eye, and have a more geometric form and a larger scale. This juxtaposition of these elements characterises this historic parkland in an important city location where no single building dominates.

453. Beyond the tree line of Duck Island to the east, the forms of modern tall buildings are discernible although heavily filtered through the trees, including 22 Bishopsgate and the Leadenhall Building in the City Cluster, and One Blackfriars, and Southbank Tower and One Blackfriars (LB Southwark). The presence of the tall buildings has the effect of bringing the wider urban context

closer into the view, and a greater sense of awareness of the wider London context.

454. The proposed new development in baseline scenarios would rise noticeably but at some distance away to the left of 22 Bishopsgate and significantly in the background of the aforementioned Victorian skyline of spires and pinnacles and to the left of the trees of Duck Island. The new building backdrops, in part, one of the secondary southern roof pitches of Whitehall Court. The impacts have been tested, in winter and at night as well as from different locations across the Bridge (View 23, 24 the LVMF and an additionally View 25)

455. The visual management guidance anticipated background development, which is now a clear part of the view and the principal groups of Victorian buildings either side of the Duck Island are read in juxtaposition with backdrop Clusters of taller buildings: the City Cluster, the Blackfriars Custer (LB Southwark) and the Waterloo Cluster (LB Lambeth). At the core of managing the Townscape Views, London Plan Policy HC4, seeks development which allows buildings or groups of buildings of architectural/cultural significance, to be seen in conjunction with the surrounding environment, including distant buildings, as is the case here. New development should be of a high standard of execution (LVMF SPG, para 75), and should preserve or enhance the characteristics and composition of the view. Indeed, the guidance is explicit that development should not breach the tree canopy profile of the Duck Island, which the proposal would not, and that new buildings should appear as part of the existing groups.

456. Designed with a subdued palette of materials and distant from both viewpoint and Whitehall Court, the development would largely recede into the backdrop of the view but It would be recognised through its principal cores, and diagrid structure, which emphasises the raked western elevation and echoes the angled form of the Whitehall Court turret in the skyline of 'spires and pinnacles.' Though only partially visible, the upper-level terrace would be open, with vegetation suggested through contrast with the otherwise glazed elevation, establishing a link with the trees of Duck Island in the middle ground.

457. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and still subservient to, the pre-eminent Whitehall composition. Its form no higher than, the principal turrets, whose intricate silhouettes would still hold the middle ground. The 'softer', more reflective material character of the distant tower, in contrast to the more solid, weighty material character of the historic group, offers further subservience. The principal sky-etched silhouette of Whitehall Court would be, on the whole, preserved there would be some incidental backdropping of the pristine picturesque roof form.

458. In cumulative scenarios the development would bookend the City Cluster and would be visible to the left of the emerging scheme for 55 Bishopsgate, which would be closer to the viewpoint position and Duck Island, obscuring the principal cores of its southern elevation. The proposed tower would step down from 55 Bishopsgate, with the projecting cores and sloped western elevation emphasising this gesture. Seen together, the development would bridge between taller buildings in the centre of the City Cluster and smaller scale buildings in the middle ground of the view, creating a more coherent and composed skyline of contemporary and historical buildings.

459. However, in baseline and cumulative scenarios, the height and scale of the proposal, would cause some tension, and slightly compete with, the Whitehall Court / Horse Guards / War Office group, whilst remaining subservient to the strong landscape setting, causing some conflict with the visual management guidance, para 431.

460. The views are equally enjoyed in daytime and night-time. The essential character of LVMF 26A is retained at nighttime, with the historic buildings at Horse Guards Parade, Whitehall Court and the Foreign and Commonwealth Office experienced in the verdant water setting. Mature trees filter the elevations of the buildings, creating pockets of light and dark across the water. The distinct built forms within the view are identified by different lighting schemes. The most prominent is the London Eye, identified by the bright lighting against the background of the view. The listed buildings within the view are largely in darkness although the illuminated clock face of Horse Guards is a bright feature. Tall buildings in the wider urban context are visible in the background of the view, noticeable beyond the mature trees on Duck Island which have a screening effect. Their lit-up forms reinforce awareness of the central London location, although these do not form a focal point of the view, and neither would the proposal.

461. The proposal has been designed to minimise light pollution from internal and external lighting, and would be secured in detail via condition including aviation lights. There would be no other form of external lighting visible from here. The development has been designed in accordance with details and technical requirements of the draft Lighting SPD and would be in accordance with the Corporate Lighting Strategy. Overall, lighting would be managed to ensure the development would not command the focus in the view or distract unduly from other elements of the composition.

462. The proposal would preserve the characteristics and composition of the identified landmark elements, The London Eye, the Foreign Office and the Shell Centre tower, whilst also allowing for the juxtaposition between

picturesque landscape and historic features, by day and night, so that they could still be appreciated in their London context.

463. However, the proposals would depart from the guidance in para. 431. This inconsistency with LVMF guidance has also been identified by the Historic England, and the GLA.

464. Historic England conclude the proposals challenge the LVMF guidance for this view as the proposed tower would result in further harm to the Whitehall buildings and St James's Park, where the development would be seen alongside the consented 55 Bishopsgate behind Duck Island. Though of a lower height, so that a smaller proportion of the development would be visible compared to the latter, it would sit directly behind the southern end pavilion roof of Whitehall Court and encroach further into the characterful view.

465. GLA Officers (para 47 Stage 1 letter) note the proposals appear to the left of the consented 55 Bishopsgate scheme and the irregular crown appears in the context of the roofline of Whitehall Court (II*) and the Ministry of Defence (I).

466. Officers conclude the architectural quality of the tall building would be exceptional, having regard to roofline, materials, shape and silhouette, and would be recessive to and distinct of the spires and pinnacles of the listed buildings and in complies with paragraph 75 and but not all of para 77, 78 and 431. However, the location and height of the tall building within the view would be inconsistent with other objectives in paragraph 431. The development would be noticeable relative to the viewer's experience of the historic group of buildings on Whitehall, competing with them.

467. Officers conclude that the development would, to a degree, distract from the architectural and cultural significance of this townscape view as a set piece and the development would not, on the whole, enhance the characteristics or composition of the view. The development would be inconsistent with the LVMF SPG guidance paragraphs 77,78 and 431.

Other LVMF strategic Impacts

468. The development would not be visible from the other following LVMF views: LVMF 8A.1 Westminster Pier; LVMF 9A.1 Kings Henry's Mound; LVMF 12A.1 Southwark Bridge; LVMF 18A 1-2 Westminster Bridge; LVMF 20 A-B Victoria Embankment; LVMF 21A-B Jubilee Gardens; LVMF 22A Albert Embankment; LVMF 23A Serpentine Bridge; LVMF 24 Island Gardens; LVMF 27A 1-2 Parliament Square. These views are not therefore assessed in the report.

Summary of LVMF Impacts

469. The proposals would preserve the Tower of London as the Strategically Important Landmark and the composition and characteristics of LVMF views. There would be some minor enhancement to certain panoramic views by consolidation western edge of the City Cluster. Lighting, including aviation lighting, would 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.

470. The proposals would also, in the main, largely preserve St Paul's Cathedral as the Strategically Important Landmark and the composition and characteristics of LVMF views. Objections and comments from statutory consultees are acknowledged and officers have sought mitigation measures to reduce impacts but also identify the proposals would fail to enhance the characteristics and composition of LVMF 15B 1-2 , 17B1-2 and 26A. The proposal as kinetically experienced in LVMF 15B.1-2 and 17B.1-2 would slightly and momentarily reduce the sky gap between the City Cluster and the Cathedral and in doing so slightly diminish the ability to appreciate St Paul's Cathedral, as the Strategically Important Landmark, whilst otherwise preserving the relationship between the river frontages and key landmarks. In the case of LVMF 26A the proposal would slightly erode the ability to appreciate the composition of some key foreground landmark elements. As a result, there would be conflict with London Plan Policy HC4, Local Plan Policy CS13 (1) and emerging City Plan 2040 Policy S13 (1).

City of London Strategic Views

Monument Views

Views from the Monument (HTVIA View 16):

471. 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.

472. Para 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, respectively, into the Bank Conservation Area and western fringe of the City Cluster.

473. The proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall and would clearly step down from the main apex of the Cluster but be largely screened by 22 Bishopsgate and Tower 42. The proposal would read as part of the consolidating Cluster, enhancing the appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would rationalise the view; albeit in the cumulative scenario, the proposal would be obscured by the consented form of 55 Gracechurch Street.

Views of and approaches to the Monument

474. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD (Figure 8), leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposal would be in its near setting and visible in some of the identified 'Views along Street Axes'.

475. In views on approach from Princes and King William Streets, the proposal would be peripheral to the viewing experience of the Monument, situated at a distance to the north east of the principal (semi-formal) orientation of the view SE along King William Street, where the Monument's sky silhouette and skyline setting would be unaffected. No harm would be caused and the proposal in accordance with paragraphs 4.19-21 of the SPD.

476. In views from Tower Bridge (along Monument Street axis), the proposal would be viewed as part of the consolidating Cluster and largely screened by existing and emerging tall buildings. The orientation of the view along Monument Street in which the skyline setting of the Monument rising out of the Custom House would be unaffected and the proposal would be peripheral to that experience. From Monument Street itself, the proposal would not be visible, allowing adequate space to recognise and appreciate the Monument. No harm would be caused and the proposal in accordance with paragraphs 4.22-23 of the SPD.

477. The SPD identifies the approach to the Monument from Gracechurch Street, from the junction with Lombard Street in particular down to the junction with Eastcheap. From this section the proposal would be behind the observer with no direct intervisibility. From further back up Gracechurch Street / Bishopsgate, the proposal would be read as part of the City Cluster and at no point would it obscure or otherwise detract from the emerging kinetic view of the Monument. No harm would be caused and the proposal in accordance with paragraphs 4.24-25 of the SPD.

478. In views looking north from Queen's Walk, on the original alignment of the Old London Bridge, the proposal would appear as part of the Cluster to the north-

east, firmly part of the modern development in the background largely screened by 22 Bishopsgate. The proposal would leave the Monument's skyline presence undiminished. No harm would be caused and the proposal in accordance with paragraphs 4.26 of the SPD.

Conclusion on the Monument

479. In summary, the proposal has been designed to protect and enhance significant local views of and from the Monument, thus protecting their contribution to the overall heritage of the City, in accordance with Local Plan Policy CS 13 and associated guidance in the Protected Views SPD.

St Paul's Viewing Points

480. The proposal would be visible in river bridge Viewing Points of St Paul's and the western extremity of Fleet Street in the Protected Views SPD (Figure 3) which seek to protect the backdrop and skyline setting of the Cathedral. The proposed height and form of the tower has been designed around the strategic heritage consideration of the processional approach to the Cathedral from Fleet Street and to consolidate a coherent Cluster form in those strategic riparian views in line with LVMF visual guidance. The development would not be visible from the identified views from Cheapside, Watling Street, St Martin Le Grand, King Edward Street, Canon Street and in the more distant views from St John Street, Amwell Street and Farringdon Road the development would be peripheral.

481. The development would be visible in the kinetic riparian sequences from Thames Bridges and the south bank between Hungerford Bridge and London Bridge. The SPD acknowledges that the relationship of tall buildings to the Cathedral varies with viewpoint. In particular para 2.20 notes the clear gap on the skyline between the Cathedral and the eastern Cluster from the south bank west of Blackfriars Bridge and from Waterloo Bridge which should be retained. The guidance advises the height and massing of buildings in the Cluster should step upwards from this gap to maintain the visual relationship between the Cathedral and the Cluster. Emerging City Plan 2040 para 11.6.11 reference these objectives from the protected views SPD.

482. Along the South Bank from Waterloo Bridge to London Bridge (HTVIA views 34, A12, A13, A14, A15, A7) the proposals follow the guidance maintaining a clear sky gap with the proposed height and articulated silhouette stepping upwards from this in a manner which would define this western boundary creating a clear skyline separation between modern city and monumental Cathedral. The impacts from the river bridges are discussed in detail in the strategic views section and officers acknowledge a slight reduction in the clear

sky gap close to the north bank from Waterloo Bridge and to a lesser extent from Hungerford Bridge otherwise the proposals retain a substantive sky gap and read as nuanced stepping up from the periphery to the centre of the Cluster.

483. From the Processional Route the envelope has been designed to avoid any erosion of sky silhouette and space afforded to the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance and this has been tested in a series of Fleet Street views (HTVIA November 2024 Approach 38, 1 -8).

484. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral (HTVIA View 40 and A16). The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. The proposal would not affect the surrounding roofscape of the Cathedral.

485. St Paul's Cathedral and Historic England object to the proposals noting a noncompliance with the SPD objectives and emerging City Plan 2040 (para 11.6.11). Overall, officers consider the proposal has been designed to protect strategic and local views of St Paul's Cathedral, its setting and backdrop and the development would follow the established approach of stepping up from the gap albeit through the architectural treatment of the silhouette. From Waterloo Bridge and Hungerford Bridge there would be a more apparent change in the relationship between the Cluster and the Cathedral. This would result in a momentary and slight erosion in the setting of the Cathedral, conflicting with Local Plan Policy CS 13(2) and associated guidance in the Protected Views SPD and LVMF SPG and emerging City Plan 2040 Policy S13.

<u>Views from other publicly accessible elevated viewing areas</u>

486. The Sky Garden is a popular public viewing gallery and visitor attraction offering 360-degree views of London. Due to its siting to the north, the proposals would not impact the open experience of the south terrace, or the quality of the microclimate. The impact would be to northerly views of the Cluster. From this view point the building would sit tightly in the Cluster and be almost entirely screened by 22 Bishopsgate. The proposals are therefore considered to preserve the public enjoyment in views from the Garden.

487. From 22 Bishopsgate the development would be immediately to the north west and experienced in close proximity. The development would preserve a 180 degree experience taking in Broadgate, views towards Alexandra Palace and the Hampstead/Highgate Ridge and across the City to the west and south. This would offer the viewer an immersive experience within the City Cluster

and a thrilling sensation of almost being able to touch surrounding tall buildings. The viewing experience would be preserved in baseline scenarios and in cumulative experiences the 55 Bishopsgate would screen the development.

488. From the new public roof terrace at 6-8 Bishopsgate the development would be screened by 22 Bishopsgate.

489. From One New Change southwest of the site. St Paul's Cathedral is the primary viewing experience, and the City Cluster more peripheral. The proposed development would be prominent as a geometric and complex tall building and expand the city Cluster to the north. In baseline and cumulative scenarios, the development represents a further addition to an already established tall building context and would be a secondary element in the view. There would be no impact on the spire of St Mary le Bow. The overall viewing experience would be preserved.

490. From the public conservatory for the emerging scheme at 55 Bishopsgate immediately to the south the development would be in close proximity. However, the lower height of the development would ensure views to north from the uppermost public external terrace and the conservatory would largely be preserved.

491. From the emerging 120 Fleet Street, the proposal would appear prominently inserted in the Cluster and sit alongside 22 Bishopsgate with Tower 42 and lower mid height buildings stepping down in the foreground. Its tapered silhouette, glass and latticed architecture would clearly position the building as part of the Cluster but its form offers a distinct and elegant addition. The buildings would preserve views of St Paul's Cathedral and the processional route and would allow the two to be read together as a dynamic City skyline experience.

492. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals would appear within the City Cluster, situated to the left of 22 Bishopsgate and behind Tower 42. In baseline and cumulative scenarios, the proposed development creates a transition down from 22 Bishopsgate as the tallest building in the collection of towers, mirroring the transitional role of 1 Leadenhall in this particular experience. 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 Lambeth Local Views:

493. Adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD. The Local Views of relevance here are: (c) Panoramas .i) views NNW from Brockwell Park to (a) Lambeth Town Hall's tower and (b) St Matthew's Church tower; and (c) views N and NNE to the city ii.) View NNE from Norwood Park (across LB Southwark) to the city iii.) View N from Gipsy Hill (across LB Southwark) to the city iv.) View N from Knights Hill (across LB Southwark) to the city viii.) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral and (d) xviii.) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark.

494. In the distant panorama views (Ci-iv) the distant City is seen as a positive orientation point, whilst St Paul's Cathedral and the City Cluster are identified as positive landmark elements, where the consolidation of tall buildings in the centre is deemed to likely enhance the view by adding to the richness of the cityscape. In Lambeth's Local views c(i- iv) (HTVIA View A20-23) the proposal would be embedded in the Cluster and largely concealed by 22 Bishopsgate and there would be no significant impact on the composition of these views due to existing tall buildings and orientation.

495. In terms of C viii.) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral (HTVIA view A12) and View D xvi.) is towards the NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark (HTVI View A 13) the development would be visually prominent. In baseline scenarios the proposed development would consolidate the western edge of the city Cluster stepping down from the tallest element of the Cluster 22 Bishopsgate and the articulated and raked silhouette would provide visual interest and variety on the city skyline. From this orientation the development would retain a substantive sky gap to the west with the Cathedral, assist in consolidating the overall Cluster form and would reinforce its compositional contrast to the Cathedral, which would retain its prominence. The proposal in both baseline and cumulative scenarios would thus preserve these views.

496. Panorama View ix) from Queen Elizabeth Hall Roof Garden the proposal would be visible but peripheral to the visual experience and from x) Level 4 Royal Festival Hall Terrace the development would not be visible.

497. Overall, it is considered the proposal would protect (and enhance) the general composition and character of these Local Views.

498. London Borough of Lambeth raises no objection.

London Borough of Southwark Local Views:

499. Adopted Southwark Plan Policy P22 seeks to preserve and enhance Borough Views of significant landmarks and townscape, enhancing the composition of the panoramas across the Borough and central London as a whole. This comprises five designated views, four of which are towards the CoL and three of which are focused on St Paul's Cathedral. The proposal would not be visible in View 2 (the linear view of St Paul's Cathedral from Nunhead Cemetery), View 3 (the linear view of St Paul's Cathedral along Camberwell Road). The development would; be behind the viewer in View 5 (the townscape view south from the centre of Millenium Bridge). These would be preserved.

500. In terms of the panorama from View 1 (One Tree Hill), (HTVIA View A24), it is deemed one of the best views of Southwark in the context of London from one of its highest points. St Paul's is the Strategically Important Landmark (SIL), benefitting from a Protected Vista. The strategic siting and silhouette, form an attractive compositional feature in its own right. In baseline and cumulative scenarios, the development would largely be screened by other buildings in the Cluster, but would assist in consolidating its form as an important landmark.

501. View 4 (King's Stairs Gardens, River Prospect HTVIA View A4) is identified as a characterful view of some of London's most famous landmarks including Tower Bridge, St Paul's Cathedral and the River Thames. The proposal would be visible stepping down to the right of 22 Bishopsgate and would assist in consolidating the City Cluster as a strategic landmark element, demarcating the historic commercial core of London, reinforcing its influence in the composition, alongside the London Bridge Cluster, in framing the viewers orientation on those key landmarks, Tower Bridge and St Paul's (and to a degree, the Monument), enhancing their recognition and appreciation in the composition as the 'gateway' to a great historic riparian city. In baseline and cumulative scenarios, the development would reinforce that prevailing historic pattern and scale of buildings either side of the River, stepping up to the centre and historic and commercial core of London with tall buildings Clusters set back from the Thames in line with the visual guidance. Overall, the proposal would preserve the composition of the view, and of significant landmarks and townscape, ensuring the River Thames and its frontage, Tower Bridge and St Paul's are maintained in the view in accordance with P22.

502. In summary, the proposal would preserve Views 1 and 4, in accordance with Southwark Plan Policy P22 and the visual management guidance contained in Appendix 4.

503. There London Borough of Southwark responded and had no comment.

London Borough of Islington Local Views:

504. Adopted Islington Development Management Policies Policy DM2.4(B) identified local protected views of St Paul's Cathedral and St Pancras Chambers and Station, which it seeks to protect and enhance. These comprise Views LV1-LV8. The proposal would not be visible in views LV1, 2, 3, 6, 7 or 8, which would be preserved.

505. From Views LV 4-5, (THVIA View A25 and A26) from Archway Road/Bridge, provide good panoramas of central London from an elevated position on rising hills along a principal artery and historic arrival point to London. The strategic siting of the City Cluster is clear, set away from St Paul's which would not be impinged upon. Where the Cluster is visible behind the rich foliate framing these views, it draws the attention of the viewer to the location of the City and commercial core of London, assisting in their recognition of St Paul's within the wider panorama. Where visible, (more prominently in Winter) the proposed Development is seen as a subtle addition to the existing buildings which comprise the Eastern Cluster, to the right hand side of the frame. In baseline and cumulative scenarios, the proposals would integrate into the existing townscape given its similarity of form and architectural style, remaining subservient to the datum height established by 22 Bishopsgate and 1 Undershaft.

506. Overall, the proposal would protect Views 1, 2, 3, 4, 6, 7 and 8, while protecting and enhancing View 4 and 5 in accordance with Policy DM 2.4.

507. The London Brough of Islington have been consulted and not responded.

City of Westminster Local Views:

508. Adopted Westminster City Plan 2019-2040 Policy 40(F) (Townscape and Architecture) states that new development affecting strategic and local views (including views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views where possible. Whilst in draft, the Metropolitan Views SPD (2007) is understood to contain those local metropolitan views. Of the 45 identified, the proposal would be visible from V42(A) (Waterloo Bridge, downstream) and V43 (A)(Hungerford Bridge, downstream), V25 (Lambeth Palace from

Lambeth Bridge) and V34 (Horse Guards and Whitehall Court from St James' Park), from V21 (St Paul's Cathedral from Victoria Embankment outside Somerset House), V22 (Dome of St Paul's from Somerset House River Terrace).

509. View V21 (HTVIA View 33) from Victoria Embankment looking east along the embankment is an unusual view of the dome of St Paul's, un-encumbered by other structures, which are screened out by the tree canopies. The draft SPD notes the background of this view is sensitive to the impact from high buildings in the Bishopsgate, Shoreditch and Spitalfields areas. To the right of the dome is the City Cluster which has expanded and is now part of the composition postdating the draft WCC SPD. The proposed development would be noticeable and immediately to the right of the Cathedral concealing Heron Tower flanked by Tower 42. In cumulative scenarios 55 Bishopsgate would partially occlude the new development and the clear deferential stepping down in heights towards the Cathedral dome would be reinforced by the consolidated form of the expanded Cluster. The development would not harm the clear backdrop of the Cathedral which could remain distinctive and detached from the City Cluster continuing to rise above the tree canopy in the local view.

510. View 22 from Somerset House Terrace (HTIVA View 32) is an historic view rediscovered by the re-opening of the River Terrace, which was a popular venue for promenading during the mid-19th century. The fact that it is now directly accessible from Waterloo Bridge is an added attraction. The elevated terrace is on a level with the canopies of the Embankment plain trees and these, together with the façade designed by Sir William Chambers, lead the eye towards the dome of St Paul's, which is the focal point. This draft guidance identifies the whole of the terrace of Somerset house as the viewing area and these have been tested in HTVIA C11 and C12 and Additional City of London Views March 2023.

511. St Paul's Cathedral and Historic England object to the proposals and identify heritage harm to the Cathedral from this viewpoint. Westminster City Council have responded and do not wish to comment on the proposal.

512. The original clear sky setting of the Cathedral identified in the draft guidance has evolved. In existing scenarios, the viewing experience is not pristine but the dome and pinnacles of the western towers remain visible from the viewing area heavily filtered by trees and flanked to the right by the Heron Tower and other tall buildings within the City Cluster.

513. In baseline scenarios the development would be immediately to the right concealing and being slighter higher than the existing Heron Tower. The

proposal would bring the City Cluster and a tall building closer to the dome. While the upper third of the tower would be visible, the lower levels would be wholly obscured by the surrounding foreground buildings. The new building would be seen in conjunction with the existing buildings of the City Cluster and is legible as part of this tall building context. In cumulative scenarios 55 Bishopsgate would partially conceal the development and would reinforce the stepping down of building heights from the 22 Bishopsgate to the fringe in a deferential manner to the Cathedral. The proposal would not be out of keeping with the existing, modern City Cluster backdrop seen adjacent to the Cathedral, and it is considered that this view is preserved.

514. The downstream views from Lambeth Bridge V25 Hungerford V43 (A) and Waterloo Bridges 42 (A) Horse Guards and Whitehall Court V34 correspond with the LVMFs and local CoL St Paul's Viewing Points addressed elsewhere in this report. The WCC Metropolitan Views SPD describes these as dominated by the City's financial district, with St Paul's remaining of central importance. This aspect would for the main remain unchanged and as set out elsewhere in this report, however officers conclude there would be a diminishment in sky gap in V42 (A) and to a lesser extent V43 (A) due to the expansion of the City Cluster towards the north west pulling taller buildings closer to the Cathedral. In V34 officers conclude he proposed development would slightly erode the skyline and the picturesque qualities of this townscape view from St James's Park towards Horse Guards and Whitehall Court and other designated assets.

515. In summary, the proposal would preserve, and in relation to V21, V22 and V25, contribute positively to, the characteristics, composition, and significance of the local views of metropolitan importance, in accordance with Policy 40 and guidance contained in the draft WCC Metropolitan Views SPD. In relation to V34, V42 (A) and V 43 (A) the development would be prominent, and the composition of V34 St James's Park would be slightly eroded and the clear sky setting of St Pauls Cathedral in V42(A) Waterloo and V43 (A) Hungerford would be eroded. The impacts on these River prospect and Townscape views are discussed in more detail including comparisons with the approved application for 55 Bishopsgate in the Strategic Views section.

<u>London Borough of Camden Local Views:</u>

516. Other than those relevant LVMF pan-London views from Parliament Hill, Primrose Hill and Kenwood, addressed elsewhere in this report, Camden have not designated strategic local views of relevance to the CoL.

517. LB Camden have responded and there are no objections.

London Borough of Hackney Local Views:

518. Hackney has not identified any strategic local views of relevance to the LB Hackney has been consulted and there has been no response.

London Borough of Tower Hamlets Local Views:

519. Tower Hamlets have questioned the likely visibility of the development across a wider area of LBTH with particular reference to a identified local view and Allen Gardens.

520. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views of which View 2V (THVIA December 2023 A20) from the Wapping Wall bridge at the entrance to the Shadwell Basin is relevant.

521. The Shadwell Basin provides a clear space over which the historic church spires of St Paul's and St George in the East can be viewed. The City Cluster is visible to the west of the view detached from the context. In baseline and cumulative scenarios, the proposed development would sit within the cluster stepping down from the apex and would serve to better to define the cascading form of the cluster on the skyline and be a slight enhancement. There would be no impact on the key elements defined in the view St Pauls Church (I), St Pauls Church Conservation Area, St Georges in the East (I), London Hydraulic Pumping Station (II*) or Canary Wharf.

522. Tower Hamlets question visibility from Allen Gardens which is within Brick Lane Fournier Street Conservation Area. The upper parts of the development would be visible from this public open space stepping down to the right of 22 Bishopsgate and in cumulative scenarios would nestle next to 55 Bishopsgate. Overall, the development would contribute to consolidating the City cluster which due to distance would read as a detached urban back drop to the verdant nature of Allen Gardens.

523. With regard to both these views the development would be visible and would read in the background as part of the distant and established City Cluster and there would be no adverse impacts to the composition or elements within the view.

Conclusion on Neighbouring Borough Local Views:

524. The proposals would result in some diminishment to WCC local views V34, V42 (A) and V43 (A). Otherwise, the proposal would preserve and, on the occasions set out above, enhancement, of neighbouring Borough strategic local views.

City Landmarks and Skyline Features, Views Of:

525. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2). These are addressed individually below:

St Pauls' Cathedral:

526. The impact on St Pauls Cathedral and its setting is identified in the SPD Protected Views and assessed in detail in the LVMF above and also under Indirect Impacts to Listed Buildings.

527. St Pauls Cathedral has metropolitan presence in London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches.

528. In wider pan London views and approaches where the Dome offers a skyline presence often defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations.

529. In baseline and cumulative scenarios officers consider that while visible, the proposals would largely not diminish an appreciation of St Paul's Cathedral as a skyline landmark and there would no encroachment on or erosion of the ability to appreciate its defining silhouette.

530. There would however be some momentary diminishment in its primacy on the skyline from Waterloo Bridge and to a lesser extent from Golden Jubilee/Hungerford Bridge due to a slight reduction in the sky gap between the Cluster and Cathedral. For the reasons set out elsewhere, it is considered proposal would slightly diminish views of the Cathedral from here.

531. The proposals would further erode the clear sky setting to the Cathedral in the aforementioned views, slightly unbalancing the relationship between Cluster and Cathedral. While a comparatively momentary, fleeting impact, this would have an adverse impact on the appreciation of the Cathedral as set out elsewhere in this Strategic View. This would result in a very slight diminishment of the Cathedral as a Skyline Feature.

Cannon Street Station (Towers):

532. The proposals would be seen as part of the wider backdrop behind the Station Towers in views from Southwark Bridge (HTVIA View 37), but distinctly forming the edge of the north-west grouping within the City Cluster with Tower 42 within the foreground. There would have no intervisibility with the Cannon Street Station Towers and the proposed development would not detract from the presence or contribution of the Station Towers within this view, with the distance of this viewpoint from the site allowing the Station Towers to remain distinct. As such it is considered views of the station towers would be preserved.

Former Port of London Authority HQ, 10 Trinity Square:

533. The proposals would be visible in views to the Former Port of London Authority, forming part of a backdrop of tall buildings within the City Cluster from Tower Hill as demonstrated within HTVIA View 13. Officers consider that while visible, the proposals would not diminish an appreciation of the listed building's silhouette or decorative detail. Further to this the cumulative scheme indicates the proposals would be screened entirely within these views, forming but part of an evolving established Cluster. Therefore, the former Port of London Authority HQ is considered to retain its prominence and visual strength. Thus, views of this City Landmark are considered preserved.

Royal Exchange:

534. The proposals would be seen together with Royal Exchange in views east from Bank Junction, sitting behind Tower 42 (HTVIA View 43). However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. In the cumulative scenario, the proposal would only be glimpsed behind Tower 42 and 55 Bishopsgate. No harm has been found to the building's significance, nor the contribution of its setting. Thus, views of this City Landmark are considered preserved.

St Botolph Bishopsgate:

535. The proposals would be seen together with St Botolph Bishopsgate in views looking south along Bishopsgate (HTVIA View 3) with the proposal sitting immediately behind the Church. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. Thus, views of this City Landmark are considered preserved.

The Guildhall:

536. The proposals would visible above Guildhall Art Gallery from Guildhall Yard as part of the wider City Cluster. There would be no in direct impact on the historic Guildhall. In both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. Thus, views of this City Landmark are considered preserved.

St Mary Aldermary:

537. The proposals would be seen together in views east along Queens Victoria Street, as demonstrated within HTVIA View 42. However, in both the baseline and cumulative scenarios, Officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings which is detached and contained from St Mary Aldermary. Whilst the proposal would be the closest tower to St Mary Aldermary, the chamfered edge helps ensure adequate sky space around the spire. Thus, views of this Skyline feature are preserved.

St Lawrence Jewry:

538. The proposals would be visible within the backdrop in views east along Gresham Street. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a distant and detached backdrop of tall buildings. Thus, views of this Skyline Feature are considered preserved.

St Augustine:

539. The proposals would be seen together in views east along St Pauls Churchyard in the background to views with this landmark still siting prominently in the foreground. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a distant and detached backdrop of tall buildings ancillary to a pre-eminent foreground. Thus, views of this Skyline Feature are considered preserved and impacts are further discussed in the Heritage section of this report.

St Giles Cripplegate:

540. The proposals would be seen together in east from St Giles Terrace. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings which is detached and contained from St Giles Cripplegate. Thus, views of this Skyline Feature are considered preserved.

Tower Bridge:

541. The proposal would affect viewpoints towards Tower Bridge along the South Bank of the River, located to the east and looking west. From Butler's Wharf, in the baseline scenario, the proposal would be partially visible in the City Cluster, appearing to the rear-right of the Cluster, some distance from Tower Bridge in this view. In cumulative scenarios the development would be occluded by 1 Undershaft and 100 Leadenhall. Thus, views of this City Landmark are considered preserved and impacts are further discussed in the Heritage section.

Tower of London:

542. The proposals would be seen in views from and towards the Tower of London, specifically identified and assessed in detail elsewhere in the report. This assessment acknowledges the longstanding relationship of the City Cluster with the setting of the WHS, appreciated as a distinct and separate, but historically associated, element. This assessment has found the proposals would be seen with the Tower of London in views from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London. Within these views it has been found that the proposals have a limited visual impact and would not obscure, distract from or dominate the Tower of London due to the intervening distance, siting, scale, form and appearance of the proposals, which would assist in consolidating the Cluster form Thus, views of this City Landmark are considered preserved and impacts are further discussed in the ToL section of this report.

Church of All Hallows on-the- Wall (Grade I):

543. The proposals would be seen together with All Hallows Church in views looking eastward along London Wall (HTVIA View 50) with the proposal sitting immediately to the south of the Church. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings which help frame the church as a focal point. Thus, views of this City Landmark are considered preserved.

St Botolph without Aldgate:

544. The proposals would be seen within the backdrop of views of St Botolph without Aldgate looking eastward, as seen within HTVIA View 6. The Church spire would still sit prominently and clearly within the foreground, with sky space around it. Therefore, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views and therefore the views of this City Landmark are considered to be preserved.

Conclusion on City Landmarks and Skyline Features:

545. The proposal would preserve views of all relevant City Landmarks and Skyline Features with the exception of St Paul's Cathedral. This would result in some conflict with part of Local Plan policy CS 13 (2) and City Plan 2040 S13 (2).

Overall conclusion on Strategic and Local Views:

546. The proposal has been sited in the City Cluster which is central to the strategic growth balance in the City. This seeks to consolidate strategic growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of the City and London. It would assist the consolidation of the City Cluster and would preserve and take opportunities to enhance the composition and characteristics of Panoramic LVMF views 1A - 2, 4A , 5A and 6A. It was also sited and designed to preserve strategic views of and from the Monument and largely of the setting and backdrop to St Paul's Cathedral, including from the Processional Route.

547. There would be some momentary diminishment of the primacy of St Paul's Cathedral as the Strategically Important Landmark in LVMF River Prospects 15 B.1 and 15 B.2 and to a lesser extent LVMF 17 B.1 and 17B.2. The proposal would also adversely affect the characteristics and composition of the Townscape LVMF View 26A St James's Park.

548. The proposal would preserve the composition and characteristics neighbouring borough views other than WCC Metropolitan Views Draft SPD 2007 Local Views 34, V42 (A) and V 43 (A).

549. The proposals would draw some more limited conflict with CS13 (2) in that, whilst preserving views of most relevant City Landmarks and Skyline Features, it would adversely affect views of St Paul's Cathedral from Waterloo Bridge and Hungerford Bridge.

550. Overall, the proposal satisfies CS13 (3), as it relates to the Tower of London World Heritage Site. The development draws some limited conflict with Local Plan Policy CS13 (1 and 2), emerging City Plan Policy S13 (1 and 2), London Plan Policy HC4 (A), GLA LVMF SPG and City of London Protected Views SPD and Westminster Draft Metropolitan Views SPD Local Views 34, V42 (A) and V 43 (A).

Designated Heritage Assets

Indirect impacts

St. Paul's Cathedral (Grade I) - (HTVIA Aug 2024 Views 26 -36 38- 40, 56-61 A12-A14, A16, HTVIA Nov 2024 View 34, 38, Fleet Street Approach 1-9)

551. Historic England object strongly to the application identifying less than substantial harm in the middle of the range. They consider the development would erode the clear sky back drop above Heron Tower adjacent to the Cathedral resulting in a cliff edge noticeably higher than the Cathedral and this would be most damaging from Waterloo Bridge 15B.1. The scale and massing would compete with the Cathedral and diminish visual prominence resulting in harm to significance and ability to appreciate it. Historic England notes the prominence would be affected in much wider ranging river views albeit it to a lesser extent and draws attention to the view from Somerset House terrace. These matters are addressed below and in the strategic views section of the report.

552. Historic England comment that the proposal would make the form of the Cluster more assertive and less deferential compared to the existing Heron Tower profile; Historic England speculate that the 2001 Inspectors decision to grant permission for the Heron Tower 'might' have been because the Heron Tower was lower than the Cathedral and because it has a sympathetic stepped form. The Inspectors decision does not represent a line in the sand and only assesses the merits of the proposal at the time. For clarity the Inspector stated there was no harm to the Cathedral, that 110 Bishopsgate was beneficial to the Cluster and overall vista from Waterloo bridge *and "In overall terms contributing to the Eastern Cluster of high buildings in the City the proposal would in my opinion enhance the skyline".* This 2001 decision is now nearly 25 years old and the policy context and baseline and cumulative skyline has transformed considerably and created 21st century Cluster, which is more expansive, dynamic with taller and more architectural expressive buildings.

553. Historic England also draw attention to the consented tall building at 55 Bishopsgate and the consensus of harm at the time from HE, St Pauls Cathedral, GLA, City Officers. Officers concluded that from Waterloo Bridge

and to a lesser extent Hungerford Bridge the height, mass, and siting, of 55 Bishopsgate in baseline and cumulative scenarios would increase the prominence and visual weight of the Cluster of tall buildings, pulling the Cluster closer to, and erode the strategic skyline gap between, it and the Cathedral. To this end the development detracted from the architectural, historic and communal significance of St Paul's, altering the balance of visual prominence between the Grade I listed building and the tall buildings Cluster beyond. Less than substantial harm at the lower end of the spectrum was identified by officers. These matters are addressed below and in the strategic views section of the report.

554. St Paul's Cathedral identify harm to heritage significance with particular reference to the erosion of the clear skyscape setting of the Cathedral with the City Cluster. The Cathedral comments this is essential to maintain as this sustains the Cathedral's visual prominence which contributes to key elements of significance. Harm is also identified as arising from the increased height, massing and physical presence of the Cluster relative to St Paul's creating an obtrusive hard cliff edge Cluster close to the Cathedral altering the pre-eminence of its scale and size in comparison to its setting. The Cathedral further notes the massing would alter the "centre of gravity" for the views diminishing dominance and affect features of architectural interest and how they are appreciated. The Cathedral note the river corridor as an element of setting where the impact of these aspect proposals would be most appreciable particularly 15 B.1. The Cathedral also draws attention to the view from Somerset House terrace. These matters are addressed below and in the strategic views section of the report.

555. Historic England and the Cathedral refer to their "Setting Study" as already stated City officers consider this a worthy document but currently it has no weight as a material consideration. Notwithstanding this the identified elements of setting within the document largely align with those identified by officers set out below including the "clear sky" which is also recognised in the Protected Views SPD and emerging City Plan Policy 2040 (para 11.6.11).

556. The GLA identifies a low level of less than substantial harm and notes despite design amendments, including a chamfered edge at a high level, the proposals appear closer to and higher than the Cathedral. This is identified as very noticeable at 15B.1 tending to detract from the primacy of the Cathedral. These matters are addressed below and in the strategic views of the report.

557. Officers have considered these representations carefully. There is some consensus (i.e. that harm would be caused), but clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report; generally speaking, officers

consider that the objections have overplayed the nature, scale and severity of this harm.

558. The following assessment should be read in conjunction with the relevant paragraphs in the preceding Strategic Views section above.

Significance:

559. One of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain. It is now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of the national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp, and the final resting place of figures central to the national story - a place of national commemoration and celebration.

560. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting:

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

i) those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen

alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.

ii) The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.

iii) Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.

iv) Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact:

562. The proposal would preserve those aspects of setting which contribute to an appreciation of the Cathedral's significance comprising elements (ii), (iii) and (iv) identified above.

563. In terms of those strategic City-wide riparian views from the banks of the Thames and its bridges, largely these are also preserved with the Cathedral remaining as the pre-eminent landmark in these views, overwhelmingly retaining this important element of significance both as a symbol of the Diocese of London and as an internationally famous symbol of London itself. Wren's great classical dome still dominates the townscape around and has been an enduring part of the London's character for centuries.

564. Objections from statutory consultees (including Historic England) are to the impact on setting and significance from south western vantage positions and

particularly from Waterloo Bridge and Somerset House Terrace. Officers also identify an impact on the setting of Cathedral also conclude there is a degree of isolated harm from two river bridges. As set out in detail in the 'Strategic Views' section above, the impact would be greatest in the viewing experience from Waterloo Bridge and, to a lesser extent, from Hungerford Bridge.

565. From these places, in baseline and scenarios, (HTVIA Aug 2024 Views 26,27, 28,29 30,31, 32 HTVIA Nov View 27)the proposal would appear as a new tower at the north-west corner of the Cluster, visually (but not physically) close to the Cathedral. Whilst of a scale commensurate with its position as an edge, rather than central, component of the Cluster, it would present a more vertical silhouette to the Cathedral than the existing Heron Tower, although this would be greatly mitigated by the way it would rake deferentially back into the Cluster. It would further erode the clear sky space near the Cathedral in these views and the effect of this would be to slightly alter the balance between the Cathedral and Cluster and the Cathedral's relationship with its clear sky background; the proposal would slightly challenge the Cathedral's visual prominence in these specific viewing experiences.

566. This visual proximity would, of course, be greatly mitigated not only by the deferential raking edge of the proposal and its architectural treatment, but also by its sheer physical distance away from the Cathedral (over 1,000m), the fact that it would be inserted into an established cluster of tall buildings on the skyline, and the fact that the Cathedral has a visual gravitas and international fame which bestows upon it significant resilience to nearby changes in the same field of view such as the proposal; it is, and would remain, instantly recognisable.

567. Nevertheless, the proposal would challenge, in a quite specific and fleeting way, the visual prominence of the Cathedral; and given the extremely high significance and therefore sensitivity of the Cathedral, officers consider that the contained and relatively fleeting impact of the proposal would as a result cause harm to its setting and significance.

568. Officers similarly identified harm from 55 Bishopsgate in baseline and cumulative scenarios through its impact on the sky gap but also its height, abrupt scale change and sense of isolation. Whilst the proposed development erodes the sky gap further due to its siting on the western fringe, the stepped height, raked crown and feathered edge temper the impacts to make the proposal meaningfully deferential and responsive to the Cathedral. In cumulative scenarios 55 Bishopsgate benefits the proposal and pulls the centre of gravity back towards 22 Bishopsgate and 1 Undershaft and reinforces the established character of the Cluster stepping down from the apex.

569. Impacts are also identified to views from Somerset House river terrace, (HTVIA View 32) and this is addressed elsewhere in the report. Again officers acknowledge a noticeable change to setting but consider the impact in this distant and tree filtered experience would preserve the venerated status and ability to recognise the Cathedral and its historic and commanding presence on the skyline. Officers also note the Secretary of State 2002 decision on the Heron Tower, para 11, which noted the elimination of the sky gap and that the introduction of the new building into the view would cause some harm to the recently opened up views from the roof terrace. The SoS like the Inspector concluded that this aspect should not in itself be regarded as having a damaging effect in the setting of St Pauls' as a listed building.

570. St Paul's Cathedral is an iconic Grade I listed building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to any harm to the significance in evaluating any impacts. Notwithstanding the limited nature of the visual impacts these are currently highly public experiences and therefore Officers consider the proposals to result in an erosion to the current established sky setting of this Grade I listed building.

571. Given the very high sensitivity of the Cathedral, officers therefore concur with Historic England, GLA and the Cathedral and acknowledge that this results in a level of less than substantial harm to the significance of the listed building; but officers consider the level of this harm to be at the low end of the scale as a result of the momentary impacts from Waterloo Bridge and to a much reduced extent from Hungerford Bridge.

572. Great weight is attached to this harm when considered under the planning balance section of this report.

Royal Exchange (Grade I):

Significance:

573. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite, the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. It replaces three royal exchanges previously built on the site and is symbolic as symbolising the centre of commerce for the City of London.

574. It is of exceptional historic and architectural interest as "the greatest of the City's 19th century exchanges" and remains as the only survivor. Its

exceptional architectural composition, prominent site location and historical association all suggest a public role. It is historically symbolic as the centre of the commercial life of the City and the financial role of the surrounding development.

Setting:

575. The setting of the listed building comprises the grand Cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail and contributes to an understanding of the former function in this financial district of the City. In HTVIA View 43 The Royal Exchange appears centrally within this composition, drawing the eye through its grand porticoed frontage. Views east from the junction take in, the tall buildings of the City Cluster seen in the backdrop. The contrasting architectural languages of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building's setting.

Impact:

576. The proposals would be seen in views eastward from Bank Junction, taking in the Royal Exchange. HTVIA View 43, taken some distance from the site, demonstrates the setting relationships of the existing buildings in the eastern Cluster and the interaction between the historic townscape and the character of the 21st century commercial centre. In the baseline scenario, the site would appear part of the northern element of the City Cluster, with the building located behind intervening development of Tower 42 and 125 Old Broad Street. The upper levels of the proposed development would be seen as part of the established group of taller buildings with the lower to upper central potions of the building obscured by the intervening buildings. Within the cumulative scenario, the development would be further screened by 55 Bishopsgate.

577. The intervisibility with the building in this way would not affect the value of the heritage asset and only serve to reinforce these positive juxtapositions between the significant assets and the commercial centre of the Cluster. As such the proposals would appear consistent with the existing tall building backdrop setting and would reinforce this part of the townscape character. Officers consider that while visible, the proposals would not diminish an appreciation of the listed building's silhouette or decorative detail. It is considered there would be no harm to the significance of this listed building or to its setting in both baseline and cumulative scenarios.

37-38 Threadneedle Street, British Linen Bank (Grade II)

Significance:

578. The British Linen Bank (37-38 Threadneedle Street) was built in 1902 to the designs of J. MacVicar Anderson. It is constructed of Portland Stone, in a heavy Palladian style; rusticated and arched below, columns above, with pilastered end bays. It was the headquarters of the British Linen Bank which was later acquired by the Bank of Scotland in 1969.

579. The building derives its historic and architectural interest as a purpose built bank headquarters of the early 20th century, in the Palladian style. It also forms part of the early 20th century period of commercial development within this part of the City, in which a number of banks and financial institutions took up residence.

Setting:

580. The heritage asset is seen within the context of the tall buildings of the Eastern City Cluster, which articulate the extent of transformative change that this area of the city has undergone. There is some surrounding commercial development from the Victorian/Edwardian eras, including Westminster Bank directly to the east and Lloyds Bank opposite at 39 Threadneedle Street, which helps to contribute to an understanding of the historic functional setting and bridge the gap between the City's medieval and contemporary character.

Impact:

581. The proposed development would be seen noticeably in views towards the heritage asset from the northeast on the approach along Threadneedle Street and also from views looking north along Bishopsgate. The building would be seen as a prominent new element forming part of the eastern Cluster. The proposed development would be appreciated as an addition to the existing and emerging tall building context along Bishopsgate and would not introduce a new form of development within the Bank's immediate setting.

582. Officers consider that while visible, the proposals would not detract from or change the experience of the listed building or an appreciation of its heritage value. Where the development is visible, it is largely peripheral to the experience of the heritage asset and reinforces the existing urban context. The development would not harm the setting or significance of the listed building.

Hasilwood House 52-68 Bishopsgate (Grade II)

Significance:

583. 52-68 Bishopsgate was built in 1928 to the designs of Mewes and Davis. It comprises a five-storey building which 14 bays wide. It is constructed of Portland Stone in a North American Beaux Arts architectural style.

584. The building possesses a high architectural and artistic interest owing to the survival of its grand, extensive principal façade, cupola and entranceway which is a high-quality example of Beaux Art commercial architecture. This is articulated by symmetrically placed sash windows, the use of Doric columns, restrained façade, and detailing. The entrance to St Helen's Place penetrates the building in its central four bays and features the arms of Leathersellers Company on an entablature carried on fluted Doric columns and striking and prominent cupola which is equally experienced from within St Helen's Place and from Bishopsgate.

585. It articulated the period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. The building also has architectural interest owing to the survival of its grand, extensive principal façade, cupola and entranceway which is a high-quality example of Beaux Art commercial architecture.

Setting:

586. The immediate setting of the buildings is much changed with modern office buildings opposite and further along Bishopsgate. Many of these have been constructed in a contemporary Portland stone, referencing the historic materiality of the area. This includes the existing building at 55 Bishopsgate opposite which has been carefully designed to respect 52-68 Bishopsgate being reflective of the scale, proportion and construction materials. In the wider vicinity, the contrast in contemporary development becomes greater with the presence of a number of tall buildings which form part of the Eastern Cluster. 56-68 Bishopsgate is already experienced in the context of the tall towers of 22 and 100 Bishopsgate, which appear against the backdrop of the building's principial elevation.

587. The gateway and its architectural interest is particularly appreciated within the tranquil setting of St Helen's Place a unique enclave and commercial context where there is a unblemished backdrop to the roofscape and cupola with Tower 42 on the periphery. This clear sky setting enables an appreciation of architectural and artistic values.

588. The historic setting of the listed building has been largely eroded, apart from the neighbouring Guild Church of St Ethelburga which survives as a small remnant of the late 14th century and the two neighbouring buildings to the south west which survive as a remnant of the former 18th and 19th century development within the area.

589. Further south along Bishopsgate the areas origins are more apparent but these are intersected by the presence of modern, infill development that is prevalent throughout the City.

Impact:

590. The proposed development would be a prominent feature located to the north west of this asset, which has its principal elevation facing onto Bishopsgate. Within HTVIA View 20, taken from within St Helen's Place (a privately gated street accessible from the adjoining Bishopsgate), the view has a clear foreground, midground and background. The foreground contains the cobbled paving stones of St Helen's Place, which form an attractive public realm with associated street lighting and shrubbery. The central focus of the view is the main street of St Helen's Place, which travels on a linear axis from the foreground to midground of the view, terminated by 52-68 Bishopsgate. The eye is drawn along the trajectory of the paved street, which forms a central viewing corridor, reinforced by the development either side of it of a neo classical design.

591. The central viewing corridor is terminated by the Grade II listed 52-68 Bishopsgate, comprising a covered access, supported by Doric Columns which create an opening to Bishopsgate. The building also features an octagonal arcaded belfry and cupola with a weathervane. This prominent feature currently stands out against the skyline, emphasising the extent of high-quality architecture within the view.

592. The background of the view is currently dominated by Tower 42 which extends up behind nos. 3 and 5-7 St. Helen's Place to the left of the belfry. The tower is constructed of modern materials and its linear form contrasts strongly with the historic character of the traditional buildings in the foreground.

593. The proposed development would appear to the right of the asset and would introduce a considerable new building form within the view and would infill the skygap to the north west of the development. The proposed development would dwarf the asset; however, it would not sit behind its distinctive roof form with cupola and belfry. The proposed development would still allow this asset to sit prominently and be appreciated within views in the CA.

594. The proposal is seen as adding to the existing contrast established by the presence of modern skyscrapers and low scale historic development within the view that is borne out of the evolution of this part of the City. In the cumulative scenario, the building would sit alongside 55 Bishopsgate which would sit directly behind this asset. Officers consider that in the baseline and cumulative scenarios, the development would not harm the setting or significance of the listed building.

Guild Church of St Ethelburga (Grade I):

Significance:

595. The Guild Church Of Ethelburga (Grade I) dates from the late C14 to early C15 with later alterations from the C20 by Sir Ninian Comper. It was built on the site of an older church and incorporates some of the material from this earlier structure. The church is built out of ragstone and brick with stone dressings and quoins to the tower. It has a four-bay nave with a southern aisle and a western tower.

596. The church derives historic interest as a remnant of the medieval City in this location, and one of only eight pre-Great Fire churches surviving in the City of London. The church derives further architectural interest owing to the survival of features dating from the C14, particularly on its principal exterior elevation which fronts Bishopsgate. It is also listed for its interesting interiors.

Setting:

597. The Guild Church has a strong relationship with Bishopsgate which forms a significant part of its immediate setting. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the heritage value of the Church. Its setting is comprised of Victorian and Edwardian townscape interspersed with significant tall buildings including Heron Tower, 99 Bishopsgate, Tower 42 and 100 Bishopsgate adjacent to the north.

598. The Church is modest in size and is now dwarfed by modern tall buildings. This relationship now forms a significant part of Guild Church's setting; there is a sublime contrast between the church and the high finance towers that now occupy this part of the City.

599. Nevertheless, at street level, the historic character of the church with its C14 features and distinctive C18 bell turret stands out prominently within the street scene. The architectural value of the church is best appreciated on approach from the north and south, where the short western tower rises above the ragstone wall. The proposed development site is located almost directly

opposite the church the current building of which sits quietly within its setting reflecting the scale, proportion and construction materials of nos. 52-68 Bishopsgate opposite.

Impact:

600. Historic England, the London Diocesan Fund and the St Ethelburga's Centre for Reconciliation and Peace have identified harm arising from the development on this asset within their consultation responses.

601. Historic England state that the potential impacts on the setting of the Church as experienced from its churchyard have not been tested, and that the cumulative change of both schemes 55 and 99 Bishopsgate could be dramatic. In addition, concerns have been raised regarding the impact to wind conditions around the Church and that the proposed development may have implications for the viability of the existing use of the former church, which provides for its on-going conservation.

602. The London Diocesan Fund have stated that the proposed development would introduce a prominent and incongruous feature which would detract from the significance of this Church as a designated heritage asset within their response produced by DWD.

603. The St Ethelburga's Centre has set out that the proposed increase in form, density and scale of the proposed development would result in harm to the Grade I heritage asset. In addition, objections have been made in relation to both construction and microclimatic (namely wind) impacts on the historic fabric of the building.

604. The proposed development would result in a new, prominent feature immediately to the west of the Grade I Listed Church which has its principal elevation facing onto Bishopsgate. The scale of the proposed development and its low-level treatment alongside the inclusion of a new route between Bishopsgate and Wormwood Street, would result in change to the character of the urban realm opposite the site. The distinct colonnade and bronze metal columns of the proposed development would sit prominently in views with the listed building, with a new active animated ground floor experience which would enliven the street scene.

605. New views of the Church from the public realm would be opened up from the west, providing more direct views onto the listed building which would be appreciated by more pedestrians. The inclusion of a new pocket park in the southeastern corner of the development site would further enhance perspectives of this asset through the creation of a new, verdant space for pedestrians to pause and take time out opposite the asset with new seating and trees.

606. It is considered that the contemporary, expressive and functional nature of the proposed building's form and materiality would reinforce the contrast between the ragstone façade of the listed church building. The proposed development would augment the City Cluster of modern skyscrapers and would contrast strongly with the smaller scale of the historic environment. The scheme would, therefore, be highly visible and a prominent addition within the setting of the listed building. The church, however, derives its principal significance from its exterior façade which fronts Bishopsgate and is best appreciated in close views when one is orientated away from the development site.

607. With regard to the impact that the proposed development would have on wind, daylight and sunlight. These have been assessed in detail and the proposed development is considered to result in no adverse environmental impacts including to the Peace Garden which is set out in further detail within the relevant section of this report. As regards impact to daylight and sunlight the technical detail is also addressed elsewhere in the report and any minor adverse impacts identified are unlikely to be perceptible, whilst noting that the church has low levels of light as existing. There would be no impact on the ability to appreciate the heritage significance internally and externally including architectural and historic values.

608. With regard to concerns raised regarding adverse impacts to historic fabric and structural stability during demolition and construction. A structural and historic fabric condition has been attached to require the developer to monitor impacts to St Ethelburga's Centre for Reconciliation and Peace during these processes and implement repairs if required.

609. It is considered that the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a heritage asset. It is also considered that there would be some benefits (albeit not related to heritage significance) in the opening up and creating more active frontages and public realm with seating and planting which would allow more direct enhanced views to the listed building. In addition, a condition would ensure long term structural and fabric protection of this important designated heritage asset during the construction process of the development.

Great Eastern Hotel (Grade II*)

Significance:

610. It was built in 1880-84 by Charles & C.E.Barry, it was later altered and extended towards Bishopsgate by Edis in 1899-1901. It was originally built as

a hotel for the Great Eastern Railway. It is constructed of red brick with Portland Stone to the ground floor and red Corsehill stone above.

611. Its historic and architectural interests are well preserved, exemplifying a late 19th century purpose built station hotel. It derives further historic interest owing to its association with the Great Eastern Railway, established in the mid-19th century, it connected eastern areas of Britain to London. The architectural interest is derived from its principal exterior constructed in the Renaissance with Flemish style with a particularly accomplished as a front piece to Liverpool Street Station. The building contains a series of function rooms in a range of styles which were designed to cater to hotel guests and the wider working population of the City and are expressive of social activity in the later-C19 and the status of terminus hotels. The hotel has group value with Liverpool Street Station, with which it has a strong historical and functional relationship.

Setting:

612. As for Liverpool Street Station the setting makes a positive contribution to the significance of the building, despite recent and late twentieth century development to the east and north screening the full extent of the train sheds from view from the majority of the surroundings. Views of the station entrance from Bishopsgate are seen together with the Liverpool Street Station make a particularly strong contribution, revealing the historic functional relationship between the two buildings. Similarly Hope Square to the south west corner provides a small open space with a civic quality which show cases the southern elevation and Metropolitan Arcade. The hotel is best appreciated in close up views of its principal elevation, from which the site cannot be seen, due to the presence of interposing development.

Impact:

613. The proposed development would be a prominent addition to the skyline to the south of this asset, which would be readily visible in views from outside the listed building and within its immediate setting. Once such view on approach to the site is shown within HTVIA View 3, where the proposed development would sit behind the asset. The profile and ornate roof of the building would not be affected by the proposed development, with the existing building at 99 Bishopsgate already sitting behind the asset. Whilst the proposal would form a prominent new addition within the wider setting, would not affect the ability to appreciate significance. The scale and appearance of the proposed development is entirely in accordance with the established townscape setting of the listed building, sitting within the City Cluster. The materiality of the proposed building would in fact provide more of a contrast between the Great Eastern Hotel and the development, emphasising its ornate detailing and

expressive brickwork better. The proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset.

Bishopsgate, Church of St Botolph (Grade II*)

Significance:

614. Built between 1725 and 1729, this church was initially designed by James Gould and later modified under the supervision of George Dance. The east and main façade is crafted from Portland stone and showcases an arched window framed by paired Doric pilasters that support a pediment. Notably, this church diverges from the typical layout of other City churches, with the tower located at the east end, and the chancel situated beneath it. The tower rises in three stages, embellished with pilasters, a clock, and crowned with four urns encircling a circular lantern within a balustrade. At the top, there's an ogee dome and a carved finial. The remaining elevations are constructed from red brick and Portland stone, with modifications made in the 19th century. The interior of the church is also of interest.

615. The church has historic interest as an early Georgian church with 19th century alterations that illustrates the development of the area at the time. Architectural and artistic interest derives from the appreciation of its Neo-classical style, featuring an unusually placed tower at the east end. The interior of the church also contributes to its significance. The church is part of four medieval churches dedicated to Saint Botolph, each situated by one of the city's gates. Today, only three of these churches remain, including this church, St Botolph's Aldgate, and St Botolph's Aldersgate. Their collective significance is enhanced by their proximity and association with essential medieval defence features (gates) within the City.

616. The church of St Botolph (Grade II*), two drinking fountains, three overthrows and lanterns, the Bishopsgate Parish Memorial (Grade II) and St Botolph's church hall (all Grade II), all have group value and form a distinct group of buildings and structures.

Setting:

617. The church is positioned to the north of the development site. Its setting is defined by its location along Bishopsgate, just north of the remains of the medieval London Wall and one of the City gates. The setting of the Church encompasses its churchyard, to the east of the church, initially established in the 15th century, expanded to its current size in 1760 and was transformed into a garden in 1863. While the setting of the church has undergone

substantial changes over the years, the enduring presence of a churchyard, regardless of its various forms, forms a positive element of the setting of the Church which consistently enhances the church's significance. The Church Hall and listed structures within the churchyard also make a positive contribution to it. The church's setting extends to include numerous large-scale developments that surround it, varying in size, age, and appearance. These include Dashwood House, 55 Old Broad Street, and the distinctive elliptical tower-like structure at The Crosspoint (34-37 Liverpool Street) immediately to the north. This element of the setting does not contribute to the significance of the church. The remaining 19th century facades of the buildings to the north of the Church make some positive contribution to its significance.

Impact:

618. The London Diocesan Fund have stated that the proposed development would introduce a prominent and incongruous feature which would detract from the significance of this Church as a designated heritage asset within their response produced by DWD. Officers reach different professional conclusions as set out below.

619. The proposed development would replace the existing building at 99 Bishopsgate with a building of a significantly larger scale, and as such it would be more visible in views towards the Church than the existing building, as demonstrated within HTVIA View 4. Despite the clear increase in scale, the proposal is considered to align with the existing character setting of the Church of St Botolph's. It would appear as a modern tall building, distinct and separate from the Church with lower rise development between the site and the asset.

620. Existing tall development, including 55 Old Broad Street, Dashwood House, the existing buildings on the development site, and the distinctive elliptical tower-like structure at The Crosspoint (34-37 Liverpool Street) form part of the backdrop of the Church. Within such a much-altered setting, informed by the presence of numerous tall buildings, the proposed development would not detract any further from the Church, its prominence and appreciation within the City skyline.

621. Giving consideration to the above, the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset.

<u>8 Bishopsgate Churchyard (Victorian Bathhouse) (Grade II)</u>

Significance:

622. Bath House by S. Harold Elphick, in an elaborate Islamic style and constructed in 1894-5 for James Forder Nevill. It is constructed of a combination of materials, including faience tiles, terracotta, and brick. It includes the highly decorative original polygonal apse at the eastern end, with a copper octagonal lantern on top, with stained glass lights and a projecting bracketed cornice, crowned by a coloured glass onion-shaped dome with a metal finial featuring a star and crescent spire. The original entrance is located on the north elevation, close to the eastern end, featuring an intricate terracotta door frame with attached columns and a multifoil arch. The north-west corner, west side, and south facade all date from the 1970s and 80s and are constructed with modern engineering bricks. They are notably of a simpler design than the ornate eastern end. The south elevation is more utilitarian in appearance and incorporates a modern ventilation grill. This side of the building incorporates part of white glazed brick wall that seems to align with the eastern boundary of the previously demolished Broad Street House. The lavish interiors, although now altered to some extent, are of interest for their quality and distinctive Islamic-styled tiles designed by Elphick.

623. The significance of the Bath House primarily arises from its architectural and historic interest as a purpose-built Victorian Turkish Bath House in the City, specifically built on a very constrained site. The small eye-catching kiosk on the ground floor was designed to advertise its much larger subterranean space. Architectural interest is also derived from the appreciation of its unique and highly elaborate Islamic style and decorative features, externally and internally. This is manifested in features such as the elaborate octagonal apse on the eastern end and glass onion dome as well as the use of rich terracotta and faience finishes. Although the Bath House has undergone considerable changes to its form and setting, it still retains much of its high-quality design and architectural features. The truncated wall, likely part of the New Broad Street House (former building at 55 Old Broad Street) is only considered to be a fragment of the original setting of the Bath House with much of its context now removed.

Setting:

624. The setting of the Bathhouse has changed dramatically over the years. Initially it formed a ground floor extension projecting outward from the corner of New Broad Street House, located within an exceptionally cramped urban environment, tightly enclosed by neighbouring structures on all sides. During the 1970s, the Bath House was transformed into a standalone structure, preserving much of its original Victorian exterior, with supplementary additions made to the north-west corner, western, and southern facades. Its principal approach from the east was and remains open with views of the polygonal apse and cupola when approaching from St Botolph's Churchyard. These are

considered to be the most important views of the asset and the only element of setting to contribute to its significance.

625. Otherwise, although the Bath House remains enclosed by modern buildings to the south, north and west, the modernity of these buildings and the complicated level changes surrounding the listed building mean that it derives no significance from these other elements of setting.

Impact:

626. The proposed development would be visible in the background of views around this asset, but given the distance between the site and this asset alongside the existing presence of substantial buildings around the asset - including between it and the development site - it would read as a disassociated part of the City Cluster and would not further impact this asset. The proposals would not harm the setting or the significance of this listed building.

13 Bishopsgate (Grade I)

Significance:

627. The Westminster Bank, 13 Bishopsgate, was built in 1865 by J Gibson. The building was constructed as the new head of office by the direction of the National Provincial Bank of England. The Bank is constructed in Portland stone in a Neo-Classical style with arched windows and Corinthian columns.

628. The building derives historic interest as a mid-19th century purpose-built headquarters of a national bank. Commercial development of this period in this area of the City was defined by the design and use of buildings for banking and associated commercial activities. It also derives historic interest for its association with a prominent 19th century architect, John Gibson, who worked with Sir Charles Barry on the Houses of Parliament. The bank also draws architectural interest from its principal elevations that present a rich Neo-Classical façade with figures in high relief to the Bishopsgate Road.
Setting:

629. The immediate setting of Westminster Bank is the junction of Threadneedle Street and Bishopsgate. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the historic heritage value of the Bank. The development which surrounds the heritage asset is mixed with Victorian, Edwardian and inter-war buildings as well as modern tall buildings that show the historic evolution of this area of the City.

630. Directly opposite the listed building and within its rear backdrop can be seen a number of tall buildings of the Eastern Cluster, as demonstrated within HTVIA View 18. This includes 22 Bishopsgate directly opposite, which stands at 62 storeys (294.5m AOD in height) and Tower 42 and the existing building at 99 Bishopsgate. Overall, it is considered that the setting makes a neutral contribution to the understanding of the receptor's heritage value.

631. In views looking north along Bishopsgate, the current building on site is visible with the listed building being largely seen within the silhouette of the building at 15 Bishopsgate which sits to the south of the site. In the current context the existing building stands as an undistinguished element within the setting of the Grade I listed bank and has a neutral contribution to its setting.

Impact:

632. The proposed development would be a prominent new addition immediately to the north of this listed building which has its principal elevation facing onto Bishopsgate. The contemporary nature of the buildings form, including the southern service core with a distinctive articulation would contrast strongly with the Portland stone façade of the historic building which would continue to stand out prominently within the streetscape. The proposed development would add to the existing contrast established by modern skyscrapers and the historic environment which is at smaller scale. The scheme would be highly visible and a prominent addition within the setting of the listed building, adding to the backdrop of the listed building with other tall buildings within the City Cluster.

633. The listed building derives its principal significance from its exterior façade which fronts Bishopsgate on a prominent corner location with Threadneedle Street. It is a building that is best appreciated in close views where the ornate detailing can be seen. The series of Neo-Classical figures on the roof of the building would not be affected by the proposed development and they could still be appreciated in their current skyline condition.

634. HTVIA View 18 shows the setting relationship and the prominence of the proposed building in views looking north along Bishopsgate within the backdrop of the listed building. Officers consider that the development would be seen in the backdrop to the listed building forming part of the City Cluster along with other large towers. Within the cumulative scenario, the proposed development would have very limited intervisibility with this asset as a result of 55 Bishopsgate sitting between this asset and the development site. As such, it is considered in both cumulative and baseline scenarios the development would not harm the significance, appreciation or setting of the heritage asset.

<u>48 Bishopsgate (Grade II)</u>

Significance:

635. 48 Bishopsgate dates to the late 19th century and is a four-storey building, constructed of Portland Stone with richly designed architraves and pedimented windows and doorways. The windows also feature Juliet balconies, constructed of intricate, carefully crafted cast ironwork. The ground floor has a large round headed principal doorway entrance with intricate stonework detailing. The ground floor also features a large square headed opening, with a plate glass window.

636. The building derives historic interest as a well-preserved example of a late 19th century building in the Second Empire Style. The building derives further architectural interest for the flamboyancy of its design with ornate stonework that illustrates the quality of craftsmanship at the time.

Setting:

637. The immediate setting of the listed building is much changed with modern office buildings opposite and further along Bishopsgate Road. These contrast significantly with the small scale, ornate character of 48 Bishopsgate.

638. Further along Bishopsgate the areas origins are more apparent, but these are intersected by the presence of modern, infill development that is prevalent throughout the City.

Impact:

639. The proposed development would be a new, prominent feature to the north west of No.48 which has its principal elevation to Bishopsgate.

640. The scale of the proposed building and its low-level treatment would result in a change to the character of the urban realm in close proximity to the site. The ground floor colonnade with large dark bronze steel columns would be prominent in views with the listed building, introducing a new setting but this would not detract from the overall elements of significance.

641. The overall impact is therefore considered to be neutral on this asset. It is considered that there would be no harm to the significance of the listed building by way of impact on setting.

<u>Church of All Hallows, London Wall (Grade I)</u>

Significance:

642. The church was designed by George Dance the Younger, built in 1765-7 to replace a medieval church built up against the City wall. While the church's exterior is generally restrained, it features an ornate west tower that culminates in a circular cupola. The visual prominence of the tower, which is generally of small scale, is accentuating by the use of contrasting Portland stone to the stock brick of the main part of the church. The interior is particularly noteworthy and had a later influence on Dance's pupil, Sir John Soane.

643. The church has historic and architectural interest as an 18th-century church designed by George Dance the Younger. The unconventional aisleless floor plan of the church, its prominent tower made of Portland stone, and the grand arcade on its southern façade contribute to the significance of the Church. The church also holds additional historic and archaeological interest deriving from the foundations and remains of the Roman London Wall that incorporates. The interior is of interest and further contributes to the significance of the church.

644. An above-ground section of the medieval London Wall acts as the western boundary of the churchyard, and this segment is designated as a Scheduled Monument.

Setting:

645. The church is located on London Wall, a busy thoroughfare, to the north west of the development site. Its setting is defined by its location at the edge of the road, in a densely built urban setting. The location of the church by the foundations of the Roman London Wall upon which it stands makes a significant contribution to its significance. The small Churchyard, to the west of the Church is also an important and positive element of its setting. Tall buildings within the Cluster form part of the setting of the church as they appear as a backdrop to it, mainly in views from the west. These include Dashwood House, just northeast of the development site and 1 Rebel St Mary Axe and Heron Tower (110 Bishopsgate) which form the backdrop in views of the Church from London Wall looking east. These tall buildings, as well as the existing modern development on the application site, do not contribute to the significance of the Church.

Impact:

646. The London Diocesan Fund have stated that the proposed development would introduce a prominent and incongruous feature which would detract from the significance of this Church as a designated heritage asset within their response produced by DWD. Officers reach different professional conclusions and the reasons are set out below.

647. The proposed development would be a new prominent taller addition to the vicinity of the Church, particularly in views eastward along London Wall as demonstrated within HTVIA View 50. Given the much-altered context of the Church and the presence of tall buildings in and around the site that already affect views of the church and its tower, it is not considered that the proposed development would affect the prominence of the church or diminish any further from the existing context the church's ability to act as a focal point along London Wall. The increase in height and contemporary form would contrast strongly with the Church, emphasising the Church's tower as focal point.

648. The development would be seen as an addition to the existing and emerging tall building context along Bishopsgate and Wormwood Street which make a neutral contribution to this asset. As such this change is not considered to be harmful. Whilst the proposed development would be prominent in some views of the church, it would be consistent with existing tall development within the setting of the church, which is characteristic of this part of the City and is not a new element or disruptive feature out of context. In terms of its height and scale but also its architecture and materiality, Officers consider that it would not detract further from the Church of All Hallows and its prominence.

649. As such, Officers do not consider that the proposal would adversely affect any elements of the setting that make a positive contribution to the church. The proposed development, in baseline and cumulative scenarios, would not affect the ability to understand or appreciate the Church and would preserve its significance and the contribution of setting.

650. With additional consideration given to the comments made in the objection from the London Diocesan Fund that "the proposed development would impact views from Finsbury Circus which is a Registered Park and Garden and which the All Hallows sits within the setting of." By virtue of intervening development, there is no intervisibility between the Church and Finsbury Circus RPG and as such Officers consider that the Church is not within the setting of the Finsbury Circus RPG and there is no impact in this regard.

651. The impacts of the proposed development on the Finsbury Circus RPG and Conservation Area are assessed within the relevant heritage sections of this report.

<u>56-60 New Broad Street (Grade II)</u>

Significance:

652. This is an early 20th-century office building, in red brick and stone with a mansion block appearance, modified on the ground floor by C.F.A. Voysey The building has historic interest as a striking commercial building of the early 20th century and from its association with Voysey, a leading architect and designer in the Arts and Crafts movement. Architectural interest derives from its symmetrical and imposing exterior but also from its internal decoration on the ground floor that retains most of the internal fittings however, the context and positions of which has changed.

Setting:

653. The building is located on New Broad Street, a street is predominantly flanked by medium scale commercial buildings, creating a harmonious immediate setting that makes a positive contribution to the significance of this asset, including separately listed No. 62 New Broad Street. The street itself is narrow and runs straight, oriented from east to west, with a notable sense of enclosure. The buildings within the New Broad Street Conservation Area make a positive contribution to the significance of this asset. In the wider setting of this asset and as can be seen in views looking east along New Broad Street that include this heritage asset and the application site, the background of this view prominently features tall buildings such as Dashwood House and 110 Bishopsgate (Heron Tower). These buildings and sites make a neutral contribution to the significance of this asset.

Impact:

654. The proposed development would be visible in views looking eastward along New Broad Street, with the development seen as a prominent new element forming part of the City Cluster. The proposed development would be appreciated as an addition to the existing and emerging tall building context to the south / east of New Broad Street and would not introduce a new form of development within the immediate setting.

655. Officers consider that while visible, the proposals would not detract from or change the experience of the listed building or an appreciation of its heritage value. Where the development is visible, it is largely peripheral to the experience of the heritage asset and reinforces the existing urban context. The development would not harm the setting or significance of the listed building in both the baseline and cumulative scenarios.

<u>Cathedral Church of St Saviour and St Mary Overie (Southwark Cathedral) (Grade I):</u>

Significance:

656. Dating from the 12th Century, with numerous additions and alterations over time, Southwark Cathedral acts as the mother church for the Diocese of Southwark covering much of south London. Formerly known as St Saviour's Church, it was granted Cathedral status and became Southwark Cathedral in 1905. the Cathedral itself dates from the 12th century, there is evidence of Christian worship at the site since the 7th century. The tower of the cathedral dates from the 14th century, whilst its pinnacles date from the early 19th century. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic).

Setting:

657. In terms of setting, the cathedral sits on the south bank of the Thames with its tower visible from vantage points on the River and from the City including locations on London Bridge. However, the main body of the building is largely limited in visibility beyond the local vicinity it sits within with larger commercial buildings sitting to the north and railway lines on viaducts truncating the building from Borough High Street to the south. The setting of the building has been altered over time, and it is considered that setting makes a limited contribution to the significance and an appreciation of it.

Impact:

658. The GLA have stated within their consultation response that the proposed development would result in a low level of less than substantial harm to this asset. Officers disagree with this stance for the reasons set out within the assessment below.

659. Any intervisibility between the Cathedral and the proposed development would be very limited and to views from the South. The proposed development would be visible in the general background of views around this asset as part of the wider City cluster, but given the distance between the site and this asset alongside the existing presence of substantial buildings around the asset - including between it and the development site - it would read as a disassociated part of the City Cluster and would not further impact this asset. The proposals would not harm the setting or the significance of this listed building.

<u>City of Westminster Designated Heritage assets (HTVIA View 23,24,and 25)</u>

660. The GLA and Historic England in relation to HTVIA View 23 LVMF 26A.1 identify harm to designated assets. The LVMF view is addressed in the Strategic Views section of the report. The GLA identify a low degree of less than substantial harm to designated heritage assets in the view. Historic

England also identify a low level of less than substantial with a higher level of cumulative harm noting the development would compete with the picturesque roofline of the highly significant buildings.

661. Officers have considered representations carefully and generally there is a consensus of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Whitehall Court (Grade II*) (City of Westminster)

Significance:

662. A mansion block of flats, built in 1884 by Thomas Archer and A. Green. The north end of the block, historically occupied by the National Liberal Club by Alfred Waterhouse and completed in 1887.The block is constructed of Portland Stone, in a '*vast elaborated pile with Exuberant French Renaissance, Chateau de la Loire inspired details'* and an example of a late 19th century purpose-built block of luxury apartments, for the upper classes. Its architectural value is predominantly derived in its exterior facades, the principal of which fronts Whitehall Court Road and the picturesque roofline is best appreciated and understood from St. James's Park or in riparian views. It derives further historic interest in its associations with a number of prominent historic residents including William Gladstone, George Bernard Shaw and Lord Kitchener. During World War One the building was used by MI6.

Setting:

663. The surrounding context comprises a number of highly graded listed buildings. The spires of Whitehall Court form a picturesque backdrop and an ensemble of distinct roof forms , with the Baroque cupola of the War Office and cupola clock tower and pavilions of Horse Guards. This layering of roof forms is best appreciated from the Blue Bridge of St James's Park and uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the apartment block and connections with former prominent residents. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the St James Park to the west and the River Thames and Victoria Embankment to the east. These natural elements of setting provide opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect. This pastoral setting, from St James's Park over the lake within the

Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall.

Impact:

664. From the Blue Bridge (HTVIA View 23, 24 and 25) the proposals would appear backdropping the picturesque roofline of White Hall Court's sky etched silhouette and the ensemble grouping with Horse Guards and Old War Office. The development is strategically sited and some distance from the viewpoint and in HTVIA 25 with the much more noticeable and taller 22 Bishopsgate the development would clearly be understood as distinct of the foreground context consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition.

665. The height and scale with or erode the visual clarity and silhouette of the series of roofscapes which form the setting and contribute to the architectural significance and appreciation of Whitehall Court. Whitehall Court and its contribution to the ensemble of unique government buildings would be preserved. The principal sky-etched silhouette of Whitehall Court would be, on the whole, preserved but the development would encroach on the clarity of the roofscape. The presence of the development would be a slightly detracting feature within the setting and would compete with and slightly erode the visual clarity and silhouette of the roofscape a key element of significance.

666. In cumulative scenarios, 55 Bishopsgate would appear immediately to the right of the development of the development and reinforce the presence of the City Cluster albeit in the distance and detached from the foreground context there would be a further increase in the erosion of the pristine roofline of the designated heritage asset.

667. In baseline and cumulative scenarios, the proposal would slightly harm the significance of Whitehall Court by visually competing with the picturesque roof form a key architectural element of significance. The impact is evaluated at the slight end of the spectrum of less than substantial harm.

Horse Guards (Grade I) Westminster

Significance:

668. The building was constructed in c.1754-48 as army headquarters to the designs of William Kent and built by John Vardy and William Robinson. It is constructed of Portland Stone, in the Palladian architectural style. It replaced an earlier building, as barracks and stables for the Household Cavalry. It was,

between the early to mid-18th century, the main military headquarters for the British Empire. It originally formed the entrance to the Place of Whitehall and later St James's Palace. The significance of the building is derived in its existence as an exceptional example of a mid-18th century purpose-built army headquarters in the Palladian architectural style. Its principal significance is drawn from its important contribution to historic and current Royal and State ceremonies and the Horse Guard Parade Ground. Architectural values derive from its exterior elevations and roof form including cupola lantern and octagonal clock tower which can be viewed by the Horse Guards Parade. In particular, the unique and complex roof form of the building in the foreground including the clock tower together with that of the War Office and Whitehall Court roofscapes can be best appreciated from its pastoral settings when viewed from the bridge over the lake within St James's Park. Horse Guards occupies a central and prominent position within Whitehall itself both as an individual building but also as part of an ensemble of high value historic buildings on the processional route to Parliament.

Setting:

669. The surrounding context comprises a number of highly graded listed buildings. In this experience Horse Guards is backdropped by the War Office and Whitehall Court and collectively these form an elaborate cascade of unique spires and pinnacles and cupolas which uniquely capture London's character as a city that combines historic architecture with historic landscapes. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall including Horse Guards.

Impact:

670. The impact would be similar to that as to Whitehall Court and War Office with which the building and roofscapes which forms an intricate ensemble appreciated from St James's Park Bridge (HTVIA View 23, 24 and 25). The proposed new building would appear behind the historic roofline of Whitehall Court and within the setting of Horse Guards in views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes.

671. The principal sky-etched silhouette of Whitehall Court would be, on the whole, preserved but the development would encroach on the clarity of the roofscape and introduce a noticeable modern form in the backdrop of the historic roofline. The presence of the development would be a slightly detracting

feature within the setting and would compete with and slightly erode the visual clarity and silhouette of the roofscape a key element of significance.

672. In cumulative scenarios 55 Bishopsgate would appear immediately to the right of the development of the development and reinforce the presence of the City Cluster albeit in the distance and detached from the foreground context there would be a further increase in the erosion of the pristine roofline of the designated heritage asset.

673. In baseline and cumulative scenarios, the proposal would slightly harm the significance of Horse Guards by visually competing with the ensemble of picturesque roof forms a key architectural element of significance. The impact is evaluated at the slight end of the spectrum of less than substantial harm.

War Office (Grade II*) Westminster:

Significance

674. A Government office completed 1907 and designed by William Young which possess considerable architectural and historic values. Its significance derives from its monumental English Baroque references, distinguished by the bowed corner pavilions surmounted by Baroque cupolas which disguise the irregular plan of the deep island site; the cupolas an essential part of the Whitehall roofscape, in particular when viewed from St. James's Park. Historic significance is derived from its associations with Britain's former imperialism as the main base for British Military operations. Former occupiers include Kitchener, Churchill, Lloyd George and Profumo. The building has been converted into a high residential use.

Setting:

675. Positioned between Whitehall Court and Horse Guards the surrounding context comprises a number of highly valued listed buildings and spaces. These form an ensemble along Whitehall with Whitehall Court, Horse Guards, Banqueting House and other Government Offices. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its former functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the Grade I RPG of St James to the east. This naturalistic setting provides opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect including the defining cupolas. In

this experienced positioned between Whitehall Court and Horse Guards collectively this unique grouping forms an elaborate cascade of unique spires and pinnacles. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall.

Impact:

676. The impact would be similar to that as to Whitehall Court and Horse Guards with which the building and roofscapes which forms an intricate ensemble appreciated from St James's Park Bridge (HTVIA View 23, 24 and 25). The proposed new building would appear behind the historic roofline of Whitehall Court and within the setting of Horse Guards in views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes.

677. The principal sky-etched silhouette of Whitehall Court would be, on the whole, preserved but the development would encroach on the clarity of the roofscape and introduce a noticeable modern form in the backdrop of the historic roofline. The presence of the development would be a slightly detracting feature within the setting and would compete with and slightly erode the visual clarity and silhouette of the roofscape a key element of significance.

678. In cumulative scenarios 55 Bishopsgate would appear immediately to the right of the development of the development and reinforce the presence of the City Cluster albeit in the distance and detached from the foreground context there would be a further increase in the erosion of the pristine roofline of the designated heritage asset.

679. In baseline and cumulative scenarios, the proposal would harm the significance of the War Office as part of an ensemble visually competing with the picturesque roof forms a key architectural element of significance. The impact is evaluated at the slight end of the spectrum of less than substantial harm.

Ministry of Defence (I) Westminster

Significance:

680. The Ministry of Defence was designed in 1913 by Vincent Harris, but only built after World War II, completed in 1959. It was built on part of the former site of the Palace of Whitehall. It also comprises a 16th century vaulted undercroft as well as 18th century historic rooms, originating from the buildings formerly on the site. The building is constructed of Portland Stone in a Stripped Edwardian

Baroque style, also comprising some Neo-Classical features. The Ministry of Defence possesses historic and architectural interest as a well-preserved example of an early 20th century institutional building, purpose built as the headquarters of Britain's Ministry of Defence. It derives additional historic and architectural interest for incorporating 16th century vaulted under croft and 18th century historic rooms reconstructed into the interior.

Setting:

681. The buildings draws significance from its Whitehall location the surrounding context comprises a number of highly valued listed buildings and spaces. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its former functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. The landscape setting to the east and west and river frontage as well as the glimpse of the copper roof from St James's Park emphasise the status and important function of the Headquarters. These elements positively contribute to an understanding of the building's historical placement.

Impact:

682. The proposed new building would appear behind the historic roofline of the Whitehall Buildings ensemble (Whitehall Court, War Office and Horse Guards) in iconic views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. No 22 Bishopsgate already appears above the roofline of Ministry of Defence and the presence of the tall building has the effect of bringing the wider urban context closer to the receptor of the view, and a greater sense of awareness of the wider context. The proposed development would also be glimpsed within the setting of the Ministry of from St James's Park but the visual impact would be limited and would not backdrop the Ministry of Defence roofline.

683. The proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset or impact on other elements of setting which positively contribute to significance.

<u>Registered Historic Parks and Gardens</u>

<u>St James Park (Grade I) City of Westminster:</u> (HTVIA View 23,24,25)

Significance:

684. The heritage value of the Royal Park is of high significance and it is at the historic heart of the nation. Its origins as a Royal hunting ground on the edge of London, and subsequently a Royal Park are still recognisable in its verdant and pastoral character. The inner park survives today substantially to the picturesque manner of John Nash, with its naturalistic lake and islands, informal plantations and shrubberies. The Park is culturally significant in terms of its location, neighbours, and national ceremonial routes. They are both heavily used by visitors from all over the world due to their proximity to Buckingham Palace, Whitehall, Downing Street and Trafalgar Square. The Park continually hosts significant State, Ceremonial and National events.

Setting:

685. The setting of the Royal Park has undergone substantial change throughout the years. However, the ability to appreciate the significance of the Park is not diminished by the ongoing contextual development of London. The setting is varied bound by major roads The Mall to the north, Birdcage Walk to the south and numerous and the historic rooflines of 18th and 19th century buildings to the east principally Horse Guards, War Office/Ministry of Defence and Whitehall Court create a unique urban contribution to the significance of the landscape. Historic architecture and landscape complement each other to form a highly significant place.

Impact:

686. The proposed new building would appear behind the historic roofline of the Whitehall Buildings ensemble (Whitehall Court, War Office/and Horse Guards) in iconic views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. The principal sky-etched silhouette of Whitehall Court and the ensemble of Baroque cupolas, clock towers and pavilion roof forms which contribute to an understanding of significance of the Royal Park would be, on the whole, preserved but the development would encroach on the clarity of the roofscapes and introduce a modern form in the backdrop of the setting between the historic rooflines and the existing modern tower at 22 Bishopsgate. The height and scale of the development would be a noticeable feature within the setting very slightly distracting from the picturesque setting and erode the groups contribution to understanding and appreciation of significance of St James's Park. In cumulative scenarios 55 Bishopsgate would appear immediately to the right of the development of the development and reinforce the presence of the City Cluster albeit in the distance and detached from the foreground context there would be a further increase in the erosion of the pristine roofline of the designated heritage asset a key element of setting to St James's Park.

687. Attaching great weight to the iconic heritage status and significance the harm is considered be a very slight level of less than substantial harm.

Finsbury Circus (Grade II):

Significance:

688. The Finsbury Circus Registered Historic Park and Garden sits at the centre of the Finsbury Circus Conservation Area. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the Garden together with the Conservation Area as a group is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus.

Setting:

689. The Registered Historic Park and Garden is bounded by the significant buildings which sit around the oval shaped garden, with London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon Street to the north. The residential towers of the Barbican are visible to the west of the Gardens, with other, contemporary, taller buildings visible with in its immediate setting particularly to the south and east. Owing to the imposing buildings contained within such a tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited. Tall buildings set beyond the gardens within the City Cluster are a characteristic of the wider surrounding vicinity in which the asset is situated.

690. Due to the considerable distance and extent of interposing development, there is no function nor visual relationship with the RPG and the site.

Impact:

691. The upper levels of the proposed development would infill part of an existing skyline gap when appreciated in some views moving through the Garden looking south, by introducing a new building that bridges the gap in scale between 100 Bishopsgate and 22 Bishopsgate. The appearance of the building in some views looking south is in keeping with the established

commercial centre of the City Cluster and does not challenge an appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Registered Historic Park and Garden and would add to the varied Cluster of tall buildings which are clearly distinct from this historic space, as shown in HTVIA View 47.

692. There would be no harm to the setting or significance of the Finsbury Circus Registered Historic Park and Garden.

Conservation Areas

St Helen's Place Conservation Area:

Significance:

693. St. Helen's Place Conservation Area is a small, tightly defined area on the east side of Bishopsgate, in close proximity to the Bank Conservation Area and the heart of the City. It is the sole survivor of an intricate pattern of spaces and alleys which once connected Bishopsgate and St Mary Axe. The heritage value of St Helen's Place CA is derived from its historic character, articulated by its tight-knit urban grain, medieval layout of streets and alleyways, and inclusion of two nationally important pre 1666 churches. St Helen's Church in particular remains as one of the most important pieces of medieval fabric surviving in the City. Its 13th century origins are still seen, as well as the physical manifestation of the building's organic history. There is considerable archaeological potential for the extensive precinct of the Priory of St Helen which for centuries influenced the form of the area.

694. The area continues to have deeply rooted associations with the Leathersellers Company whose architectural patronage from the reformation onwards exerted a massive influence on the area and continues to shape its development. Associations with Canadian exploration through the Hudson's Bay company and St Ethelburga's church. St Helens Place is Edwardian, and a formally planned enclosure which is unusual in the City and provides a quiet and delightful contrast to the surrounding City Cluster and activity of Bishopsgate. There is an important group of three buildings with narrow plot widths that are the only survivors of the finely grained appearance of Bishopsgate before the combination and redevelopment of building plots from the 20th century onwards.

695. They give an indication of how Bishopsgate would have looked in the 19th century and with the larger buildings elsewhere illustrate the development of the street. Accordingly, they are significant components of the conservation area. They offer important contrasts to the ongoing planning and development of tall buildings along Bishopsgate as part of the Eastern City Cluster.

Hasilwood House provides an arched public entrance and enclosure to St Helens Place a discreet enclave of a type that is unusual in the City.

Setting:

696. The Conservation Area has a uniquely nationwide context, a dramatic setting among the tall buildings of the City Cluster. This is by virtue of the City's function as a commercial and financial hub. The Conservation Area's current setting contributes very little to an appreciation of its heritage value. The Conservation Area borders the site on its south eastern corner and therefore the site forms a component of its immediate setting, on the opposite side of Bishopsgate.

697. The current building on site is not considered to be of a notable architectural quality, and is an undistinguished, natural element to the Conservation Area's setting.

698. The published Character Summary for St Helen's Place CA does not note specific views, but the views into and within St Helen's Place are clearly of importance; here, again, the backdrop of the tall buildings of the Cluster makes for a dramatic juxtaposition with the Edwardian CA buildings in the foreground. Views up and down Bishopsgate and looking east at St Helen's Church share this quality; nowhere in the conservation area are the presence of tall buildings not felt to some degree and this is intrinsic to it setting.
Impact:

699. The Conservation Area lies within the heart of the City Cluster, and the dramatic setting among the tall buildings of the City Cluster is identified as a key characteristic which contributes to the special interest of the setting.

700. The proposed development would be a prominent feature immediately to the north west of the Conservation Area and would be seen almost in its entirety from within the quiet reflective area in St Helen's Place and this is where the change in the setting would be the most impactful, as displayed in HTVIA View 20. The eastern and southern elevations of the building would create a new backdrop to the buildings on the northern side of St Helen's Place, enclosing this view and thus changing the character and experience of this part of the Conservation Area.

701. The functional and structural nature of the building's form and materiality reinforces the deliberate juxtaposition between the natural stone and ornate facades of the historic buildings. The reflective materiality with expressive structural elements of the façade allows the object to appear legible in the background. In addition, the lift core would be visibly prominent in views within

St Helens Place with this structure again sitting juxtaposed to the classical ensemble below with its functional, but articulated appearance.

702. The background of views looking westward along the central corridor of St Helen's Place is currently dominated by Tower 42 which extends up behind nos. 3 and 5-7 St. Helen's Place to the left of the belfry of Hasilwood House. The tower is constructed of modern materials and its linear form contrasts strongly with the historic character of the traditional buildings in the foreground. The proposed development would appear to the right of the belfry tower which terminates views looking west within the Conservation Area and would introduce a considerable new building form within the view and would infill the skygap to the north west of the Conservation Area.

703. The proposed development would add to the existing contrast established by the presence of modern skyscrapers and the historic environment which is of demonstrable smaller scale. Moving around the Conservation Area, outside of St Helen's Place itself, the experience of the commercial centre and these juxtapositions is even more pronounced. The scale of more recent development in baseline and cumulative scenarios enclose the CA to the north (100 Bishopsgate), south (1 Undershaft and 22 Bishopsgate), east (30 St Mary Axe) and west (55 Bishopsgate). St Helen's Church is an isolated medieval element in this context, nestled in a layered townscape including a number of tall buildings. The scheme would be highly visible and prominent addition within the setting of the Conservation Area as is characteristic of the existing setting.

704. The proposal is seen as adding to the existing contrast established by the presence of modern skyscrapers and low scale historic development within the view that is borne out of the evolution of this part of the City. In the cumulative scenario, the building would sit alongside 55 Bishopsgate which would sit more prominently immediately to the south of 99 Bishopsgate. Officers consider that in the baseline and cumulative scenarios, the development would not harm the setting or significance of the Conservation Area with a neutral effect.

Bishopsgate Conservation Area:

Significance:

705. Bishopsgate Conservation Area was designated in 2007 and included the former Middlesex Street Conservation Area, designated in 1981. The Conservation Area is located to the north of the development site.

706. The Conservation Area extends from Wormwood Street on its southern boundary, to Brushfield Street in the north. Bishopsgate was originally a Roman route travelling north out of the City.

707. The heritage value of the conservation area is defined by its staggered, more piecemeal redevelopment that occurred in the 19th and 20th centuries. This is in contrast to other areas of the City, which saw dramatic and transformative commercial development. This, combined with the Conservation Area's variety of uses (industrial, residential, commercial and transport) has led to a diverse character. The historic street layout and orientation of alleyways and squares is still visible, despite few houses remaining from this period. A significant townscape feature within the Conservation Area is Liverpool Street Station.

Setting:

708. The immediate setting of the Conservation Area is much changed with the recent expansion of the Eastern Cluster and large complexes such as the Broadgate Estate. The southerly setting of the Conservation Area is dominated by tall modern buildings at the northern edge of the City's Eastern Cluster including Dashwood House, the Heron Tower and the subject site at 99 Bishopsgate.

Impact:

709. The Bishopsgate Conservation Area is located in the heart of the Square Mile's commercial district. The area is well contained with a collection of historic Victorian and Edwardian buildings which sit beyond the original City Walls and is read as separate to the tall buildings on its boundaries.

710. The proposed development would be a prominent addition to the skyline to the south of the Conservation Area which would be readily visible in views from within and at the boundary of the Conservation Area. The scale and appearance of the building reflects the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's setting.

711. Within views looking southward along Bishopsgate, as depicted within HTVIA Views 3 and 4, the development would provide a striking juxtaposition to the modest brick and masonry development of the Conservation Area within the foreground.

712. In the cumulative scenario when viewed from the south western boundary of the Conservation Area, the development proposed would form part of a stepping up of buildings within the City Cluster with 55 Old Broad Street in the

foreground, 55 Bishopsgate in the background. This enhances the legibility and coherence of the Cluster with the stepping up being clearly defined in the layering of new tall buildings.

713. Officers consider that the proposed development within the conservation areas wider setting would have no adverse impacts on the setting of the Bishopsgate Conservation Area nor its significance.

New Broad Street Conservation Area:

Significance:

714. New Broad Street Conservation Area was designated in December 1981. The Conservation Area lies to the east of Finsbury Circus and south of Broadgate in the north-eastern part of the City.

715. The heritage value of the Conservation Area is derived in its uniformity in building scale across New Broad Street, coupled with the historical character, variety in ornament and proximity to the City Wall. Further historic and architectural interest is derived in All Hallows on the Wall (Grade I), which is considered a significant listed building within the Conservation Area along with the remains of City Wall beneath All Hallows Church and churchyard, nos. 82 and 83 London Wall and the junction of London Wall and Blomfield Street which are designated Scheduled Ancient Monuments.

Setting:

716. The Conservation Area is surrounded by a number of other Conservation Areas including Bank, Finsbury Circus, and Bishopsgate. The proximity of the Conservation Area to Finsbury Circus, comprising a formal area of green space with a surrounding high quality architectural, forms an attractive feature within the immediate setting of the New Broad Street Conservation Area.

717. The Conservation Area is located within close proximity to the tall buildings which form the Eastern Cluster. There are also a number of contemporary buildings including the those along Bishopsgate and London Wall which illustrate the extent of post war change that has occurred within the City around the Conservation Area.

Impact:

718. The New Broad Street Conservation Area is located at the heart of the Square Mile's commercial district and its setting is characterised by tall development in the surrounds.

719. The proposed development would form a prominent addition to the skyline to the south of the Conservation Area which would be visible in views from within and at the boundary of the Conservation Area. The scale and appearance of the building reflects the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's setting.

720. In the cumulative scenario when viewed from the boundary of the Conservation Area along Old Broad Street, the development proposed would form part of a stepping up of buildings within the City Cluster with 55 Old Broad Street in the foreground, 55 Bishopsgate in the background and Tower 42 to the edge. This enhances the legibility and coherence of the Cluster with the stepping up being clearly defined in the layering of new tall buildings.

721. Officers consider that the proposed development within the Conservation Area's setting would have no adverse impacts on the character, significance and setting of the New Broad Street Conservation Area.

Bank Conservation Area:

Significance:

722. Bank Conservation Area was first designated in 1971 with the Supplementary Planning Document adopted January 2012. The area comprises the commercial heart of the City of London around Bank Junction.

723. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. The contrast of medieval street plan, 18th and 19th century buildings and modern office developments is the quintessential character of the City of London.

724. 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 connection of financial power 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. The Bank Conservation Area combines architectural, historic and social heritage value.

Setting:

725. 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 and Gracechurch Street. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east providing a strong contrast between old and new.

726. Bank Conservation Area is also bordered by Finsbury Circus Conservation Area to the north, Guildhall Conservation Area to the West and Leadenhall Market Conservation Area to the east which all form an important part of its setting.

727. The Thames and London Bridge also contribute to setting providing significant views of buildings within the conservation area including those of the Wren churches.

728. The character of Bank junction as a historical centre is 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.

729. The development site and Conservation Area are visually separated by intervening development and the existing building is not currently experienced in its setting.

Impact:

730. The proposed development would be visible in views moving north east through the Conservation Area, with HTVIA View 43 showing the proximity of the tall buildings within the City Cluster and the interaction between the historic townscape of the Conservation Area and the character of the 21st century commercial centre. The contrast illustrates the character of the City of London which is noted as an important part of that significance.

731. The proposed development would sit behind Tower 42, and in the cumulative scenario 55 Bishopsgate, as a lower tier of development which forms part of the stepping up of the buildings enhancing the legibility of the Cluster.

732. Officers consider that the proposed development would reinforce these well-established relationships and juxtapositions without harming the setting, intrinsic character and history or the significance of the designated Conservation Area.

<u>Leadenhall Market Conservation Area:</u>

Significance:

733. Leadenhall Market Conservation Area was designated on the 16th May 1991 and extended in June 2007 to include 37-39 Lime Street and 34-3 Lime Street.

734. The Conservation Area is relatively small being dominated by Leadenhall Market and its associated buildings. The street layout of the Conservation Area is a result of the various phases of development that the conservation has undergone. This has resulted in a combination of irregularly aligned medieval streets and narrow alleyways, overlaid with the Market complex creating a layout unique to this part of the City.

735. The heritage value of the conservation area is derived from the Conservation Area's dominance of the Victorian buildings of Leadenhall Market which are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience. This is enhanced by the contemporary vibrant mix of uses and activity, which strongly compliment the predominant financial and insurance activities in the area.

736. The conservation area derives further historic interest owing to its highly significant archaeological remains relating to the 1st century Basilica Forum and medieval Leaden Hall. As well as the preservation of the medieval street plan, comprising 19th century market buildings which offers an intricately layered plan form with retained historic thoroughfares throughout.

Setting:

737. The immediate setting of the Conservation Area comprises a rich mix of architectural styles and eras, which reflect the various stages of development that this part of the City has undergone. HTVIA Views 17 and 18 shows that the tall buildings of the Eastern Cluster are visible in views looking north along Gracechurch Street. These introduce a considerable new height element within the immediate setting of the market. Due to the enclosed and inward looking nature of Leadenhall Market and its associated buildings, its immediate setting, bar its historical location within the former commercial hub of the City contributes little to the appreciation of its heritage value.

738. The development site and Conservation Area are visually separated by intervening development and the existing building is not currently experienced in its setting.

Impact:

739. The Conservation Area covers the area of the enclosed nature of the market. The intrinsic significance of the Conservation Area lies in its architectural interest and commercial history as a shopping parade and is therefore enclosed and inward looking. As highlighted above, the immediate setting of the Conservation Area comprises a rich mix of architectural styles from a range of eras, which reflects the various stages of development that this part of the City has undergone including the tall buildings of the City Cluster in which the new development would form part of.

740. Officers consider that the proposed development within the Conservation Area's wider setting would have no adverse impacts on the setting or appreciation of the significance of the Leadenhall Market Conservation Area.

Guildhall Conservation Area:

Significance:

741. The Guildhall Conservation Area was designated in 1981 and its boundaries were readjusted in 1991 and 2007. It comprises the Guildhall buildings and adjoining urban blocks and those between Gresham Street and Cheapside. The Bow Lane Conservation Area lies directly to the south.

742. The City's civic administration developed in the early medieval period. The City flourished and became an important trading place that eventually established an independent governing body, the City Corporation headed by a mayor. A predecessor of the Guildhall building can be traced back to this time. The current building dates from the early 15th century and is today listed at Grade I. It was altered and extended in the 18th and 19th century.

743. Several livery companies established their halls along Basinghall Street in the proximity of the Guildhall. The Guildhall survived the Great Fire, but the surrounding livery halls were destroyed. Guildhall Yard is one of the few large squares in the City and provides the only public space in the conservation area. The street pattern, which had been retained after the Great Fire, is characterised by narrow alleys, courtyards and predominantly small building plots. Only King Street and Queen Street were cut through the surviving medieval fabric after the Fire to create a procedural route from the River Thames to the Guildhall Yard. Frederick's Place was a speculative development built by the Adam brothers. Gresham Street was laid out around the middle of the 19th century, connecting various older lanes. During World War II bombings, this area of the City was badly affected and many buildings lost.

744. The heritage value of the Conservation Area is derived in its historic commercial and administrative association with the Guildhall and Livery Companies which historically have dominated the form, function and architectural character of the CA.

Setting:

745. The Conservation Area borders Bank Conservation Area on its eastern boundary and the two have a close visual and functional relationship. There are significant views in and out of the area such as those towards Tivoli corner and along Old Jewry.

746. Beyond the conservation boundaries, various phases of development appear, which are more modern in character but of a similar scale, form and facing material to the historic / contemporary buildings within the Guildhall Conservation Area. These buildings sit quietly within the background and do not harm the setting of the Conservation Area.

747. More prominent buildings within the setting of the Conservation Area are set further afield comprising buildings of the City Cluster including 22 Bishopsgate, which establishes a datum height and forms the set piece of the City Cluster. It steps down to the north to the Leadenhall Building and to the south Tower 42. The presence of the tall buildings of the Eastern Cluster can be felt within the setting of the heritage asset introducing a considerable new height element. Their material palette of modern glazed panels contrast strongly with the more solid and decorative masonry buildings within the Conservation Area. The presence of the City Cluster is indicative of a wider area of transformative urban change within this part of the City and a key part of the Conservation Area's immediate setting.

Impact:

748. Visitors to the Guildhall Conservation Area would experience different kinetic views as they move around the area with the proposed tower and other buildings of the Eastern Cluster appearing in and out of view. The main focus, however, would be the immediate foreground of the view, comprising the historic architectural ensemble of buildings and the interaction between them.

749. The proposed tower would be understood as part of the existing City Cluster due to the similarity in architectural design, materiality and form. The skyline gap between the proposed development and other towers such as 22 Bishopsgate allows for the proposed development to be understood as a distinguished architectural form.

750. In the cumulative scenario, the development would be further consolidated with the City Cluster sitting slightly in front of 55 Bishopsgate, with the stepping up of the buildings enhancing the legibility of the Cluster as evidenced by HTVIA View 41. In this view, the proposed development would be visible above the Guildhall Art Gallery, which would obscure its lower levels with the proposals reading as part of the periphery to the ensemble of buildings before it.

751. Officers consider that the development would have a neutral impact as it would be seen against the backdrop of buildings with those of the Guildhall Conservation Area being within the foreground view. The experience would primarily consist of kinetic views where the proposed development would come into and out of view as one moves around the courtyard area. Where the building is visible it would be seen as forming part of the established City Cluster and read as part of this established tall building context. The effect on the Conservation Area is not therefore significant.

752. Officers consider that since the development would be seen in the backdrop of the conservation area as part of the City Cluster along with other large towers it would not be considered harmful to the heritage value or significance of the Conservation Area having a neutral effect on its setting neither enhancing nor detracting from an appreciation of the heritage asset.

Finsbury Circus Conservation Area:

Significance:

753. The Conservation Area is a small area comprising the registered park and garden of Finsbury Circus and its surrounding development. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the CA is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London.

754. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus. It features large 19th and 20th century commercial buildings with extensive ornamental detail and a generally uniform roofline. Buildings are of particular historic and architectural interest as impressive 19th and 20th century commercial buildings with extensive detailing, modelling, uniform height and varied rooflines.

755. There are a number of listed buildings in the Area: London Wall (Scheduled Ancient Monument), Lutyens House (GII*), Park House and Gardens (GII), Finsbury House (GII), London Wall Buildings (GII), Salisbury House (GII), Business School, London Metropolitan University (GII), Drinking fountain and shelter, north side of gardens (GII). The Finsbury Circus Registered Historic Park and Garden (Grade II) sits at the centre of the Conservation Area.

Setting:

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

757. Due to the considerable distance and extent of interposing development, there is no function nor visual relationship with the Conservation Area and the site.

Impact:

758. The upper levels of the proposed development would infill part of an existing skyline gap when appreciated in some views moving through the Conservation Area looking south, by introducing a new building that bridges the gap in scale between 100 Bishopsgate and 22 Bishopsgate. The appearance of the building in some views looking south is in keeping with the established commercial centre of the City Cluster and does not challenge an appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Conservation Area and would add to the varied Cluster of tall buildings which are clearly distinct from this historic space, as shown in HTVIA View 47.

759. There would be no harm to the setting or significance of the Finsbury Circus Conservation Area.

<u>Creechurch Conservation Area:</u>

Significance:

760. The Creechurch Conservation Area was recently designated in 2023 and sits on the eastern boundary of the City adjacent to the London Borough of Tower

Hamlets. It is a part of the City that holds strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory which is reflected within the modern street pattern. The area contains three places of worship, which unusually within a City context, contains diverse origins and of outstanding architectural historic interest including the Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church). The area is noted for its strong and continuing associations with the Jewish community following resettlement in the C17.

761. The area also holds a proliferation of historic open spaces of diverse scales, functionality and appearance, in addition to a characterful group of late C19 / early C20 warehouses on Creechurch Lane / Mitre Street which are fine examples of their kind and survivors of a type now rare within the City.

Setting:

762. The setting of the Creechurch Conservation Area comprises a variety of buildings with differing scales and sizes, modern development being prevalent. Tall buildings of the City Cluster form part of the immediate and wider setting of the Conservation Area to the west, including 30 St Mary Axe and the Aviva Tower. In general, this juxtaposition of contrasting architectural scales of the Conservation Area against the backdrop of the City Cluster's tall buildings defines the setting and contributes to the significance of the Conservation Area. However, the subject site itself is not considered to make any contribution to the significance of the Conservation Area.

Impact:

763. The proposed development would be partially visible from some locations within the Conservation Area looking west, introducing an additional building of significant height and scale. With HTVIA View 6 only part of the building would be visible, sitting behind 100 Bishopsgate, whilst in more local views as you approach the site as you move westward through the Conservation Area the development would be visible as part of an established group of tall buildings. The scale, form and appearance of the proposed development would align with the existing character of the Conservation Area's local and wider setting.

764. In the cumulative scenario, the proposed development would form part of the further consolidation by new tall buildings within the City Cluster including 100 Leadenhall and 55 Bishopsgate.

765. In both scenarios, the proposed development would be consistent with the striking backdrop of modern tall buildings in the City Cluster. It would remain district and separate from the Conservation Area, aligning with the existing character of the setting. As such, the proposals would not harm the setting, significance, character or appearance of the Creechurch Conservation Area.

St. Paul's Cathedral Conservation Area:

Significance:

766. The St Paul's Cathedral Conservation Area was designated in its present form with adjusted boundaries in 2007, but contains elements of the previous Amen Court Conservation Area and St Andrew's Hill Conservation Area which were designated in February 1971 and the Ludgate Hill Conservation Area designated in December 1981 (and adjusted in 1991). The Conservation Area encompasses the Cathedral and its immediate setting, extending west along Ludgate Hill, north to the Central Criminal Court, and south to Queen Victoria Street. The Newgate Street Conservation Area adjoins to the north.

767. An area of international significance, a focal point of the City of London, part of a major processional route and a focus of national celebration. The conservation area mainly defines the immediate setting of the Cathedral, a building of international historic, architectural and cultural significance and one of England's most important classical buildings and a seminal building in the history of English architecture. An area of great architectural significance, including one of the largest concentrations in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous non-designated buildings of high architectural quality from different periods. An area where the urban grain varies from tightly knit historic streets and alleys to open spaces around St Paul's Cathedral and churchyard. It is associated with nationally significant religious, cultural and historic events and notable people, including the burial places of numerous historic figures.

Setting:

768. The setting of the conservation area is defined by its location at the heart of London, and in the eastern part of the City. Modern structures, including One New Change, are an integral part of the immediate and nearby surroundings of the Conservation Area, while tall buildings from the post-war or modern era already constitute a component of the broader setting of the Conservation Area. The tall buildings of the central City Cluster are visible in the middle distance in views along St. Paul's Churchyard/ Cannon Street, looking east out of the Conservation Area. These elements make a neutral contribution to the significance of the conservation area. Longer range views towards the

Conservation Area, such as those of the River Thames, are principally of the Cathedral itself, the wider setting of which extends beyond the boundaries of the Conservation Area. While the Cathedral is seen in the context of the City Cluster in many such views, the Conservation Area as a whole cannot be appreciated in them.

Impact:

769. The proposed development would be visible from locations in the western element of the Conservation Area, looking eastward towards the City Cluster. HTVIA View 39, taken from St Paul's Churchyard, shows that the development would be visible and understood as part of the existing City Cluster due to the architectural design, materiality and form. The skyline gap between the proposed development and other towers such as 22 Bishopsgate allows for the proposed development to be understood as a distinguished architectural form. The proposed development would also be visible from views looking eastward north of the cathedral beyond the dense tree lines, where it would sit alongside existing tall building development including Tower 42.

770. In the cumulative scenario, the development would be further consolidated with the City Cluster sitting slightly behind the proposed tower at 55 Bishopsgate, with the stepping up of the buildings enhancing the legibility of the Cluster as evidenced by HTVIA Views 39 and 40.

771. Officers consider that the development would have a neutral impact as it would be seen against the backdrop of buildings within the St Paul's Conservation Area, including the Cathedral itself and St Augustine Watling Street still sitting prominently within the foreground of views. The development would be integrated and be clearly understood as part of the City Cluster along with other large towers it would not be considered harmful to the heritage value or significance of the Conservation Area having a neutral effect on its setting neither enhancing nor detracting from an appreciation of the heritage asset.

772. Officers note comments made by Surveyor to the Fabric of St Paul's Cathedral within their consultation response to the proposals that there has been limited consideration given to the setting of the St Paul's Conservation Area within the submission. Officers have reviewed the submitted information, including the ZTV of the proposed development and HTVIA Views from within the St Paul's Conservation Area, and consider the level of detail provided to be sufficient to make an assessment.

773. In addition, the GLA have concluded that the proposals would result in less than substantial harm to the St Paul's Conservation Area. Officers reach a different professional conclusion owing to the assessment above. Whilst the proposals would be visible in locations within the setting of the Conservation

Area , notably to the south and north of the Cathedral, the proposal would be embedded and understood as part of the established City Cluster that is distinct from the character and appearance of the Conservation Area.

Bunhill Fields and Finsbury Square Conservation Area (LB of Islington):

Significance:

774. Bunhill Fields and Finsbury Square Conservation Area is located in the south eastern corner of the London Borough of Islington, immediately to the north of the Moorgate entrance to the City of London. The Conservation Area comprises a small area which is centred around the burial ground of Bunhill Fields and Finsbury Square public space.

775. Bunhill Fields was a nondenominational burial ground on the outskirts of the City of London, which was used between 1665 and 1854. As London's population grew, the requirement of cemeteries increased. With the ceasing of burials in Bunhill Fields, London's authorities embarked on the construction of seven major new cemeteries on what was then the periphery of the city. Bunhill Fields then subsequently got smaller due to development pressure as Victorian development encroached upon the land. A large number of these buildings survive of traditional construction which are interspersed with more modern post war development.

776. Finsbury Square was developed in 1777 on the site of Finsbury Fields of which none of the original terraces remain. The Square has been developed to include large-scale buildings which include modern development such as 30 Finsbury Square and the University of Liverpool's London Campus.

777. The heritage value of the Conservation Area is derived from how the area lies within the open spaces throughout the Conservation Area and how they are enclosed. There is further historic interest and associations through the Wesley Chapel and tomb of John Wesley and other positively contributing buildings of different periods.

Setting:

778. Beyond the boundaries are various other Conservation Areas including St Lukes (LB of Islington), South Shoreditch (LB of Hackney) and Sun Street (LB of Hackney). Each conservation area has a character distinctive to itself with variations of building style and scale.

779. Views of the City and the Clusters of towers are prominent within the skyline of different vistas throughout the area. Views into the Barbican are also

experienced where the buildings terminate views at the end of roads. The urban setting of this Conservation Area is varied, with contemporary, tall buildings of mixed use predominating in views out of the Conservation Area.

780. The development site, due to the separation distance and the extent of interposing development does not share a visual or functional relationship with the Conservation Area.

Impact:

781. The proposed development would be partially visible from some locations within the Conservation Area looking southeast towards the commercial centre of the Eastern Cluster. HTVIA View 44 shows limited visual impacts from Bunhill Fields itself and there would be certain points where the visibility of the building is more pronounced, as shown in HTVIA Views 45 and 46 from the Honourable Artillery Company Grounds and Finsbury Square. Where the proposed development would be more visible it would be understood as part of the established Eastern Cluster of the tall buildings that are characteristic of the City.

782. Furthermore, in the cumulative context the City Cluster would be further consolidated by new tall buildings, which would be partially visible in the backdrop including at 2-3 Finsbury Avenue and 55 Bishopsgate. This would help to reduce it presence on the skyline further.

783. Officers consider that the proposed development would not harm the setting or significance of the Conservation Area.

<u>Wentworth Street Conservation Area (LB of Tower Hamlets):</u>

Significance:

784. This is within the London Borough of Tower Hamlets. It is located to the northeast of the site. It is an area with a fine urban grain which special architectural and historic interest due to its rich history dating from 19th century. The area has a mediaeval street pattern of yards and alleys which is still evident. The area is characterised by markets and associations with the clothing industry and wave of immigration which make it a culturally diverse part of London. The London Borough of Tower Hamlets have referenced that there has been no assessment of HTVIA Appendix View 2 and therefore an assessment has been undertaken by Officers as part of the wider Conservation Area.

Setting:

785. The south-eastern setting of the conservation is defined by the backdrop of the change in scale between the 19th century street network and the distant very tall buildings of the city and the foothills to the city Cluster.

786. Views of the City and the Clusters of towers are prominent within the skyline of different vistas throughout the area. The urban setting of this Conservation Area is varied, with contemporary, tall buildings of mixed use predominating in views out of the Conservation Area. The development site, due to the separation distance and the extent of interposing development does not share a visual or functional relationship with the Conservation Area.

Impact:

787. In baseline views from Wentworth Street and Cobb Street the proposed development would be largely concealed other than the uppermost parts by other tall buildings including Heron Tower and 100 Bishopsgate. The well-articulated distinctive form would enhance the character and quality of this northern edge of the city Cluster in approaches through the conservation area.

788. The character and quality of the visual setting of the conservation area would be preserved in both baseline and cumulative scenarios which would consolidate the city Cluster and tall building backdrop and wider setting and there would be no impact on the ability to appreciate the heritage significance of the designated heritage asset or its setting. Furthermore, in the cumulative context the City Cluster would be further consolidated by new tall buildings, which would be partially visible in the backdrop including at 55 Bishopsgate and in the foreground 115-123 Houndsditch. This would help to reduce its presence on the skyline further. The proposal would help consolidate the Cluster further with stepping up of development from 110 Bishopsgate towards the apex of the Cluster to the south.

789. Officers consider that the proposed development would not harm the setting or significance of the view from Wentworth Street or the wider Wentworth Conservation Area and enough detail has been provided for a sufficient assessment of the impacts.

<u>Whitechapel High Street Conservation Area (LB of Tower Hamlets):</u>

Significance:

790. Whitechapel High Street Conservation Area is located in the west of the London Borough of Tower Hamlets, close to the Aldgate entrance to the City of London. The Conservation Area comprises the western end of the ancient

route running from the City of London out towards Colchester, Essex. The development of the High Street over time was noted historically as catering for travellers and accommodating the 'nuisance' trades that had been refused entry into the congested City. Over time as the City grew swiftly in the 14th, 15th and 16th century, it marked the first emergence of the East End slums within the area. By the 19th century with the arrival of the docks and associated industry, the area became home to an important junction between Whitechapel High Street and Commercial Road known as Gardeners Corner which acted as the gateway between the City and Docklands.

791. At the centre of the Conservation Area is Altab Ali Park, formerly St Mary's Gardens. The park provides greenery and rest in the heart of a busy, tight knit urban environment as well as providing views towards the City Cluster. This park holds much value to the local community, containing a replica of the Shaheed Minar whilst also enabling long views of the unique surviving pre-war townscape set around the greenspace. The Conservation Area contains several listed buildings, including the Grade II* Whitechapel Art Gallery and Church Bell Foundry alongside other Grade II and Locally Listed Buildings.

792. The heritage value of the Conservation Area is derived from its special architectural and historic interest, illustrated by its rich history and significant architecture, dating from as long ago as the 16th century and including much of interest from the 19th century and early 20th century. Collectively, the rare surviving pre-war townscape is noted for its importance. The area is also noted for holding archaeological value.

Setting:

793. Beyond the northern boundary of the Conservation Area is the Fournier Street Conservation Area (LB of Tower Hamlets), with the Creechurch Conservation Area within the City of London close by across the borough boundary to the west.

794. The setting of the Whitechapel High Street Conservation Area, and especially the areas surrounding it to the south, east and west, contrast in scale and architectural articulation with the development within the conservation area. Development to the west of the Conservation Area provides a transition in scale between the intimate historic scale of the asset and the very large development within the City beyond.

795. Views of the City and the Clusters of towers are prominent within the skyline of different vistas throughout the area. The urban setting of this Conservation Area is varied, with contemporary, tall buildings of mixed use predominating in views out of the Conservation Area.

796. The development site, due to the separation distance and the extent of interposing development does not share a visual or functional relationship with the Conservation Area.

Impact:

797. The London Borough of Tower Hamlets have made observations that views from within the Conservation Area – notably Ali Altab Park – should have been assessed within the HTVIA given the visibility of the development in these views.

798. The proposed development would be partially visible from some locations within the Conservation Area looking west towards the commercial centre of the City Cluster, including from Altab Ali Park. HTVIA Appendix Model View 1 shows that the proposed development would have limited visual impacts from within the park itself, where it would sit within the background of existing tall building development including 100 and 110 Bishopsgate which would sit in front of the majority of the proposed building with just the upper most elements visible. Where the proposed development would be more visible it would be understood as part of the established Cluster of the tall buildings that are characteristic of the City.

799. Furthermore, in the cumulative context the City Cluster would be further consolidated by new tall buildings, which would be partially visible in the backdrop including at 55 Bishopsgate. This would help to reduce its presence on the skyline further. The proposal would help consolidate the Cluster further with stepping up of development from 110 Bishopsgate towards the apex of the Cluster to the south.

800. Officers consider that the proposed development would not harm the setting or significance of the Conservation Area and that the model views provide enough detail for a sufficient assessment of the impacts on this Conservation Area.

Non Designated Heritage Assets

Liverpool Street Arcade:

Significance:

801. Remains of the original Metropolitan Line Station, including the (much altered) post-electrification Edwardian Metropolitan Arcade, executed in a well-detailed French pavilion classical manner, drawing much significance from setting, namely at the heart of a major Victorian railway ensemble at Liverpool Street

with a strong group value with Liverpool Street Station (GII) (incl. 50 Liverpool Street, Hope Square and the 'Neo-Victorian' towers) and the former GEH (GII*). It is considered to be of a high level of local significance for its architectural and historic value, and considered a non-designated heritage asset.

Setting:

802. The arcade draws much significance from setting, namely at the heart of a major Victorian railway ensemble at Liverpool Street with a strong group value with Liverpool Street Station (GII) (incl. 50 Liverpool Street, Hope Square and the 'Neo-Victorian' towers) and the former GEH (GII*).

Impact:

803. There would be intervisibility between the arcade and the proposed development at Liverpool Street when looking southward at several locations, as demonstrated in HTVIA Views 52 & 53. The Non Designated Heritage Asset is part of the mid ground of low scale 19th century historic townscape that sits opposite the Station and the Great Eastern Hotel. This is articulated by varied and interesting roof profile and architectural features of note including the stucco treatment and round arched/ circular windows.

804. The proposed development would appear behind the non-designated asset, in the foreground of the existing tall building context. It is considered that the contemporary, expressive and functional nature of the proposed building's form and materiality would reinforce the contrast between the classical and rich detailing of the arcade in the foreground. The proposed development would add to the City Cluster of modern skyscrapers and would contrast strongly with the smaller scale of the historic environment. The increased height and scale of the proposal is mitigated by a number of design features including the landscaped promontories on the two northern corners which helps break down the façade, and the chamfered corner which reduces the perception of the building's mass.

805. Within the cumulative scenario, the inclusion of the development of 55 Old Broad Street would sit in front of the proposed development giving a sense of the rising City Cluster stepping up from the historic lower rise townscape in the foreground.

806. Giving consideration to the above, the proposed development would not harm the setting or significance of the non-designated heritage asset in both baseline and cumulative scenarios.

St Botolph's Churchyard

Significance:

807. St Botolph's Churchyard includes the open space to the south and south-west of the Church of St Botolph without Bishopsgate. Its origins date back to the 15th century, and it was expanded to its current size in 1760. In 1863, it was transformed into a public garden. It includes an east-west path that runs through the application site and connects Bishopsgate and Old Broad Street. The Church Hall is located within the north-western part of the Churchyard, as well as the Bishopsgate Parish memorial, two drinking fountains, three overthrows and lanterns, all of which are Grade II listed and discussed earlier in this section.

808. This historic area, despite changes over the years, holds historic interest as a historic churchyard associated with the Church of St Botolph. It is a defining element of the setting of the Church, the Church Hall, and the other listed structures with which it has group value. Some artistic interest derives from the design of the Churchyard, including paths and landscaping. There is a sense of calm within the Churchyard that contrasts with the busy roads that surround it.

Setting:

809. The setting of the Churchyard has changed drastically over the years, especially in the post-war period. The Church, Church Hall and listed structures it includes make a significance contribution to it. Tall buildings form part of the setting of the Churchyard, including Dashwood House, immediately to the west but also the Crosspoint building to the north, and One Bishopsgate Plaza and 110 Bishopsgate on the eastern side of Bishopsgate. These modern elements do not contribute to its significance.

Impact:

810. Tall buildings already form a part of the setting of this asset. The proposed development would replace an existing tall building with a taller one, which would be visible in views from the Churchyard looking southward. Given the extent of tall development within the vicinity of the asset owing to its location north of the City Cluster, the proposed development would form part of a consistent character, defined by tall buildings, and not as an isolated feature.

811. The relationship of the Churchyard with the Church, Church Hall and other associated structures within it, would not be affected as a result of the

proposal. Therefore, the significance of the Churchyard would not be affected by the proposed development in both baseline and cumulative scenarios.

30 St Mary Axe (The Gherkin)

812. 30 St Mary Axe comprises a 41 storey landmark building, constructed to designs by Foster & Partners and completed in 2003. The building is noted as an early 21st century office building of the highest architectural quality, awarded the Stirling Prize in 2004.

813. Its setting is not considered to be adversely affected by the proposal, a high-quality tall building which would be commensurate with the Gherkin's existing character and positioned and designed in such a way as to form a complimentary neighbour within the vicinity of this asset.

Other Designated Heritage Assets:

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

- 1 – 6 Lombard Street (Grade II)
- 1 Cornhill (Grade II)
- 1 Old Broad Street (Grade II)
- 1 Poultry (Grade II*)
- 1 Queen Victoria Street (Grade II)
- 12 Austin Friars (Grade II)
- 123 Old Broad Street (Grade II)
- 13 – 17 Old Broad Street (Grade II)
- 13 Austin Friars (Grade II)
- 13-17, and 18, Old Broad Street (Grade II)
- 14 Austin Friars (Grade II)
- 2 Royal Exchange (Grade II)
- 23 Austin Friars (Grade II)
- 23, 24, 25 Great Winchester Street (Grade II)
- 26 Throgmorton Street (Grade II)
- 3 – 5 Bishopsgate (Grade II)
- 32, 34, 41, and 43-47, Threadneedle Street (Grade II)

- 38 St Mary Axe (Grade II)
- 39 Threadneedle Street (Grade II)
- 46 Bishopsgate (Grade II)
- 62 New Broad Street (Grade II)
- 63 – 73 Moorgate (Grade II)
- 7 – 9 Bishopsgate (Grade II)
- 7 Lothbury (Grade I)
- 76 – 80 Old Broad Street (Grade II)
- 76 – 92 Moorgate (Grade II)
- 80 Coleman Street (Grade II)
- Adelaide House (Grade II*)
- Aldgate Police Callbox (Grade II)
- Aldgate School (Grade II*)
- Armourers and Braziers Hall (Grade II*)
- Bank of England (Grade I)
- Bank of England War Memorial (Grade II)
- Bevis Marks Synagogue (Grade I)
- Bishopsgate Parish Memorial (Grade II)
- Carpenters Hall (Grade II)
- Christ Church, Spitalfields (Grade I)
- Church of St Andrew Undershaft (Grade I)
- Church of St Andrew Undershaft, Iron Gates and Railings (Grade II)
- Church of St Botolph Aldgate (Grade I)
- Church of St Botolph Aldgate, Gateway (Grade II)
- Church of St Edmund (Grade I)
- Church of St Giles (Grade I)
- Church of St Katherine Cree (Grade I)
- Church of St Margaret (Grade I)
- Church of St Mary Woolnoth (Grade I)
- Church of St Michael (Grade I)
- Church of St Peter Cornhill (Grade I)
- City and Country War Memorial (Grade II*)
- City of London Club (Grade II*)
- Custom House (Grade I)
- Drapers Hall (Grade II *)
- Drinking Fountain North, Royal Exchange (Grade II)
- Drinking Fountain South, Royal Exchange (Grade II)
- Dutch Church (Grade II)
- Finsbury Circus Drinking Fountain (Grade II)
- Finsbury House (Grade II)
- Former Guildhall Library and Museum (Grade II*)

- Great Eastern Railway Memorial (Grade II)
- Guildhall (Grade I)
- Hyde Park (RPG)
- K2 Telephone Kiosk (Grade II)
- K6 Telephone Kiosks (Grade II)
- Liverpool Street Station Police Call Box (Grade II)
- Liverpool Street Station Signal Box (Grade II)
- Lloyds Building (Grade I)
- London Society War Memorial (Grade II)
- London Wall Buildings (Grade II)
- Lutyens House (Grade II*)
- Mansion House (Grade I)
- Merchant Taylor's Hall (Garde II*)
- Midland Bank (Grade I)
- National Westminster Bank (Grade II)
- Old Billingsgate (Grade I)
- Old Broad Street Police Callbox (Grade II)
- Park House and Garden (Grade II)
- Port of London Authority Warehouses, Cutler Street (Grade II)
- Port of London Authority Warehouses, Cutler Street Gate Piers (Grade II)
- Port of London Authority Warehouses, Houses to the East (Grade II)
- Port of London Authority Warehouses, Houses to the North (Grade II)
- Pump south of Royal Exchange (Grade II)
- Salisbury House (Grade II)
- St Botolph's Church Hall (Grade II)
- St Botolph's Drinking Fountains, Overthrows and Lanters (Grade II)
- Statue of Duke of Wellington (Grade II)
- Statue of George Peabody (Grade II)
- Sun Street CA (LB of Hackney)
- The Monument (Grade I)
- Tower and Remains of Church of All Hallows Staining (Grade I)

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

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

Conclusions on indirect impacts to designated heritage assets

817. Overall, the following impacts have been identified and evaluated:

- A low level of less than substantial harm has been identified to the significance of St Pauls Cathedral (grade I)
- Very slight levels of less than substantial harm (very much lower end of the spectrum) St James's Park (RPG);
- Slight levels of less than substantial harm have been found to the significance of Whitehall Court (grade II*), War Office (grade II*), and Horse Guards (grade I);
- Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.

818. The scheme is design-led and has accounted for heritage considerations, having been designed to accentuate the unique characteristics and spirit of the City of London.

819. Overall, the proposal would draw conflict with Local Plan Policies CS12 (1), DM 12.1 (1), draft City Plan 2040 policies S11(2) and, and London Plan HC1 (C), and special regard should be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, under the duty set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2024 policies.

820. The public benefits and harm to the setting of St Paul's Cathedral (I), St James's Park RPG I), Whitehall Court (II*), War Office (II*) and Horse Guards (I) are considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report. Objections on heritage impacts have been received from Historic England, The Surveyor to the Fabric of St Paul's Cathedral and the GLA. Officers have considered these representations carefully. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Archaeology

821. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

822. The site lies 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 Local Plan 2015 states that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

823. The planning application is accompanied by an Environmental Statement which contains an archaeological chapter and archaeological baseline report by MOLA. The archaeological baseline demonstrates that, despite the site being located within the Roman and medieval city walls, archaeological remains over the majority of the site have been removed by the current basement.

824. The baseline highlights that archaeological survival is likely to be limited to three areas: in the north-east of the site under the current mezzanine, the extreme west of the site next to Wormwood Street, and the access ramp in the south. It is therefore recommended that archaeological evaluation takes place in these three areas early in the development programme to establish the extent of archaeological survival on the site and allow a mitigation programme to be designed and programmed in.

825. GLAAS requested within the scoping response that public benefit relating to archaeology be included in the Cultural Plan for the site. It is therefore very welcome to see that the applicant has worked with the London Museum to provide publicly accessible display spaces for archaeological finds within the ground floor space in the Pavilion Building, the 'Glass Gallery'. This would be secured through the S106 agreement so ensure that any finds are taken forward in the final development.

826. Historic England GLAAS have advised that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. Although the NPPF envisages evaluation being undertaken prior to demolition, in this case considering the nature of the development, the archaeological interest and/or practical constraints are such

that Historic England consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. In addition, a condition requiring a detailed design and method statement for foundations and piling configuration is also attached.

827. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan 2015, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

Access and Inclusivity

828. The proposals have been assessed to ensure that they meet the highest standards of accessibility and inclusive design as required by London Plan policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1 and S8. These policies seek to ensure that the City is inclusive and welcome for all, with no disabling barriers and that it is responsive to the requirements of all users. Policy HL1 of the draft City Plan 2040 further seeks to ensure that the City is a place that promotes equity, diversity, and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access. Policy CV2 of the draft City Plan 2040 relates to the provision of Arts, Culture and Leisure Facilities and states that the provision of arts, culture and leisure facilities should be encouraged where they would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming, and accessible for all. Policy CS19 of the Local Plan 2015 encourages additional publicly accessible open space.

829. The environment at present is not welcoming and inclusive, with many barriers to access. There is potential for significant improvement including greater cross-site permeability, improved vertical access in both external and internal environments, creation of more green and quiet spaces, and better wayfinding. There is also potential for inclusive cultural provision.

830. The principles of inclusive design have been incorporated into the proposals and the scheme is designed to be highly accessible, with accessibility being considered for all levels of the building for both visitors and office workers.

831. The site features a substantial level change from west to east of approximately 2.75m. The sitewide layout and design has been optimised to overcome this, utilising a series of gradients of 1:20 or less. The landings between slopes and ramps would be level, with appropriate rest points for ambulant disabled people.

832. The ground floor of the main building is a publicly accessible open space providing a flexible public realm area and market hall. The flexible space provides pedestrian permeability across the entire site, previously closed off to public access. The entrance doors to all parts of the buildings are inclusively accessible – sliding drum doors would be used to access the office lobbies, removing the need for pass doors; access to the Pavilion building is via sliding doors; access to the City Market is via foldable doors set behind the iron gates, that would be kept open during opening hours; and access to the terraces at upper levels is via sliding doors. Details of automation of relevant doors would be provided through the Accessibility Management Plan secured by condition.

833. Escalators and passenger lifts would provide access to all upper areas of the main building. The pavilion building would have two entrances at ground level, with stairs and passenger lift access to the upper floors. All lifts within the development would be designed to meet Part M requirements.

834. Access to the wintergardens and terraces of the main building has been designed to provide level thresholds onto the terraces and access routes, with widths all in accordance with Part M and BS 8300-1:2018.

835. The submitted Fire Statement explains in detail the evacuation procedures, and the strategy has adopted best practice procedures for the evacuation of disabled people from all parts of the buildings.

836. Toilet facilities at the Ground Floor of the main building provides two unisex accessible toilets, an accessible baby changing facility, and a Changing Places facility. These would all be publicly accessible and is a benefit of the scheme.

837. Each office floor of the main building would include an accessible WC with a choice of either right or left-handed transfer layouts. The Pavilion building would provide a unisex wheelchair accessible WC at ground level, Level 1, Level 2 and Level 4. The provision of toilet facilities would be generous and consistent with best practice.

838. The accessible ‘Blue Badge’ parking bay would be provided at basement level in the servicing bay. Details of car parking management of this space would form part of both the Delivery and Servicing Management Plan (secured by obligation in the S106 agreement) and an Accessibility Management Plan (secured by condition).

839. For cyclists, 5% of cycle spaces should be suitable for larger cycles to meet London Plan policy T5B and London Cycling Design Standards 8.2.1, and this is proposed in this application. The dimensions of wider cycle storage locations

are indicated on the plans and the size of the cycle lifts should meet London Cycling Design Standards. The cycle parking would be subject to further design development with details contained within an Accessibility Management Plan which would be secured by condition.

840. The site accommodates significant level changes from north to south and east to west. Step free access would be provided from the surrounding streets into all parts of the development. The landscaping proposed would support greater accessibility and permeability of the site, with the removal of the raised City Walkway and instead bringing this accessible route down to ground level. There are clear benefits for inclusive access from new step-free routes connecting the site in all directions, navigating its difficult level changes. This would allow people who require step-free access to move through the site without dependence on mechanical lifting devices. At detailed design stage, further information should be provided on gradients, crossfalls, planting, details of security measures (for example bollards), seating, surface materials, boundary edges, lighting, hazard protection and appropriate resting points throughout the public realm. It is recommended that an Inclusive Public Realm Strategy be secured by obligations in the S106 agreement to cover these matters.

841. The Cultural Implementation Strategy (to be secured by obligations in the S106 agreement) should demonstrate how the proposed cultural spaces in the Pavilion Building would be inclusive in terms of procurement, programming, provision of opportunities, and layout.

Access Conclusion

842. In addition to the measures outlined above the following key design principles have been followed:

- All floorspace has level access, and lift access is provided to all floors;
- Level changes are mediated across the ground floor to allow level access throughout at acceptable gradients;
- Surface treatments, lighting, and design features would all be developed with access in mind;
- A compliant provision of accessible cycle parking spaces is incorporated into the scheme.

843. Overall, the proposal accords with the aims of the relevant policies. Further details of access and inclusive design would be secured via condition. The step-free access into the site at all the entrances and internally is a great benefit towards an inclusive City for all and is welcomed as part of the proposals, and the extent of the proposed publicly accessible open space and public realm is welcomed and is a benefit of the scheme. Subject to conditions

it is considered that the proposal would meet the highest standards of accessibility and inclusive design as required by London Plan policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1.

Highways and Transportation

Surrounding Highway Network and Site Accessibility

844. There is an established network of footways in the area immediately surrounding the Site, with footways provided along each of the adjacent roads.

845. The Site is bounded primarily by the A10 Bishopsgate, a TfL Red Route, to the east, and Wormwood Street to the north. Union Court is a small street to the west of the site, and is the main access point to the basement of the building for servicing and delivery purposes.

846. There are a number of signalised pedestrian crossings within the vicinity of the Site – the junction at A10 Bishopsgate and A1211 Wormwood Street and Old Broad Street, and a single crossing over the A10 Bishopsgate, near Great St Helens.

847. The surrounding road network enables pedestrians to travel directly to and from the Site and permeate through the City to public transport nodes and other destinations.

848. The Site is within close proximity to Bank, Liverpool Street, Aldgate, Monument, Aldgate East and Fenchurch Street stations. These stations provide access to various services on the London Underground, DLR, and National Rail networks. The Site is therefore considered well located to encourage sustainable trips, in accordance with policy T1 of the London Plan, which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

849. With regards step-free access at nearby stations, Liverpool Street features step-free access to the Elizabeth Line (linked with Moorgate station), Circle, Hammersmith & City and Metropolitan Lines. Bank station provides step-free access to the northern line and DLR.

850. The Site therefore benefits from being highly accessible by non-car modes, including excellent levels of access to public transport (PTAL rating of 6b), as well as walking and cycling links in the vicinity of the Site. There are well maintained footways connecting the application site and these offer

convenient access to the local area, local amenities as well as public transport opportunities such as the bus and rail services.

Trip Generation

851. A trip generation assessment was undertaken to determine peak hour and daily person trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.

852. The approach to calculating the trip generation was agreed with TFL and CoL and benchmarked against approved planning applications for office-led developments of similar scale within the City.

853. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 to 18:00 for the PM peak. The proposed development would attract office users, visitors to the proposed retail unit, and cultural building and their staff.

854. The trip generation assessment for the existing situation found that there were 1,651 Arrivals and 65 Departures 1,716 two-way trips during the AM peak, and 1,585 two-way trips during the PM peak. The full break down of arrivals, departures and modes of transport are captured in the Transport Assessment.

855. A trip generation forecast was carried out for the main proposed land use (office). The assessment anticipates 4,247 two-way trips for the AM peak, and 3,923 two-way trips for the PM peak.

856. Table 6.3 in the Transport Assessment (below) shows the net development trip generation for the proposed scheme. This represents the total proposed development trip generation minus the existing development trip generation.

857. As a result, 2,530 net total trips are forecast during the 0800-0900 AM peak, and 2,337 net total trips are forecast for the 1700-1800 PM peak.

Table 6.3: Net Trips to the Proposed Development

Mode	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)	
	Arrivals	Departures	Arrivals	Departures
Underground, metro, light rail, tram	748	30	30	689
Train	784	31	31	722
Elizabeth Line	269	11	11	247
Motorcycle, scooter or moped	35	1	1	32
Driving a car or van	0	0	0	0
Passenger in a car or van	15	1	1	14
Bicycle	173	7	7	159
On foot	169	7	7	156
Total	**2434**	**96**	**96**	**2241**

Servicing and Deliveries

858. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

859. The servicing area for the proposed development is accessed in the same way as the existing arrangement, off-street via a ramp to the west of the site, accessed via Union Court. Vehicles would be able to enter and exit in forward gear.

860. A speed limit of 5 mph and a height restriction of 3.65 metres is in place on the ramp. In the existing scenario, there are no loading bays associated within the Site located at the basement level, with delivery vehicles currently parking on the ramp itself. The ramp is then used for vehicle egress, before vehicles travel west and out of the Site, back onto Old Broad Street.

861. A framework delivery and servicing plan has been produced for the proposed scheme.

862. As this proposed scheme is to be car free, any vehicle movements associated with it are for deliveries and servicing only.

863. It is proposed that vehicles up to 8m in length would be permitted to access the service yard. Vehicles would be able to turn within the basement in order to access and egress from the site in a forward gear, in accordance with DM16.5.

864. The existing site generated 164 one-way trips for servicing and deliveries. It is anticipated that the proposed development would generate 96 trips per day, split into 72 car/van trips and 24 MGV trips, to cater for all the associated land uses proposed on Site. The proposals include trips associated with refuse collection and facilities management.

865. The predicted vehicle mode split for deliveries is presented below, noting that any differences in trip frequency could be attributed to rounding.

Land Use	Cars / Vans less than 3.5T	Frequency	MGVs	Frequency
E(c)(iii) Office	75%	68	25%	23
E(b) Restaurant / Café	85%	4	15%	1
E(a) Non-food Retail	65%		35%	
F1(e) Public Halls or Exhibition Halls	80%	1	20%	1

866. As part of the delivering and servicing strategy, three loading bays are proposed to accommodate the maximum servicing demand per hour of the proposed scheme. One of these loading bays would operate as a hybrid loading / blue badge bay, should a blue badge holder require parking for the workday. This provision fulfils the scheme's requirements for disabled car parking for the proposed development.

867. The blue badge bay adjacent to the loading bay would act as a third loading bay, in the event that it is not used and if there are no requests to park there during the day. This flexible arrangement would be fully managed by the on-site facilities management (FM) team.

868. In the event that the blue badge bay is occupied, deliveries would still be able to take place throughout the day, but more deliveries could be received later in the evening once the blue badge bay user has departed the office. It is anticipated that there would be minimal conflict between the blue badge bay

user and delivery/servicing activity, as most deliveries and servicing would take place outside of typical office hours (i.e. 0800-1900).

869. The proposed servicing trip generation was based on the following daily trip rate assumptions:

- Class E(c)(iii) Office – 0.21 vehicles per 100sqm Net Internal Area (NIA)
- Class E(b) Restaurant / café – 1.80 vehicles per 100sqm NIA
- Class E(a) Non-food Retail – 0.59 vehicles per 100sqm NIA
- Class F1(e) Public Halls or Exhibition Halls – 0.15 vehicles per 100sqm NIA.

870. The proposed servicing trip generation analysis anticipates a total of 96 vehicle trips servicing the site per day, including refuse vehicles and facilities management. The number of trips has been achieved after using a consolidation strategy. Without a consolidation strategy, the estimated number of daily trips would be 219.

871. The draft City Plan 2040 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. It is anticipated that most delivery trips would take place between 1900 and 0700 the following day, under a managed strategy with a booking system to ensure the even distribution of delivery trips.

872. Servicing area access points are away from the highway, complying with Policy VT2 of the draft City Plan 2040, to ensure that arriving vehicles have a place to wait off the highway, preventing any congestion or delays for pedestrians, cyclists, and other vehicles and therefore ensuring road safety. The proposals for delivery and servicing comply with City Plan policy S9, due to the provision of on-site servicing facilities and encouragement of deliveries by cargo bike.

873. Overall, subject to a S106 obligation to secure a Delivery and Servicing Plan, it is not considered that the proposed servicing arrangements would result in any undue implication on the public highway, nor highway safety in general and are considered acceptable. The proposals comply with Local Plan 2015 policies DM16.1 and DM16.5 securing the provision of blue badge spaces and car-free requirements. The proposals also comply with the emerging City Plan 2040 policies S9, VT2 and VT3.

Refuse Management and Waste Strategy

874. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

875. The waste generated by the existing site is collected privately at the following frequencies for the different waste streams:
- General Waste: five times weekly (on weekdays)
- Mixed Recycling: twice weekly
- Glass: twice weekly
- Food: twice weekly

876. A Waste Management Strategy has been produced by the applicant, within the Framework Delivery and Servicing Plan, to outline details of how waste generated from the scheme would be collected/recycled.

877. The refuse/recycling collection is proposed from the servicing yard at basement level, accessed from Union Court. A single waste store is proposed at basement level 1 which all building occupants would have access to and be required to use. Tenants or the facilities management team would be responsible for transporting waste to the service yard immediately prior to collection.

878. The waste store layout includes an in-bin compactor with compaction ratios of 1:3 and 1:2 applied for general waste and mixed recycling respectively. There is no portable or skip compactor proposed.

879. A height restriction of 4.2m is proposed within the service yard, as any area where a refuse vehicle would travel should have a minimum 4.75m clear headroom provided. This is secured by condition. It is proposed that the waste strategy would be privately managed, as per the existing arrangement, with waste collection taking place daily and overnight to avoid conflict movements with cyclists and pedestrians.

880. Private refuse collection vehicles would enter the site from the north and travel down the ramp to the basement. The collection would take place within the basement, and then the vehicles would travel up the ramp to ground level and exit in forward gear onto the public highway.

881. Similar to other deliveries for the development, refuse vehicles would also need to pre-book a delivery slot to ensure no conflicts with delivery/servicing activities.

882. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facility complies with their requirements.

883. The proposals comply with the current Transport Strategy, Local Plan 2015 on Policy DM 16.1, Policy 16.5 and Policy 17.1 ensuring that waste facilities are integrated within the building design.

884. The proposals are also in accordance with the emerging City Plan 2040 and its Strategic Policy S10 complying with Policy VT2 (freight trips).

885. Overall, the proposed refuse collection strategy is considered acceptable and in accordance with policies DM17.1, DM16.1 and DM16.5 of the Local Plan, as well as emerging City Plan 2040 policies S10 and VT2. Full details are to be secured within the Delivery and Servicing Plan under the S106.

Pedestrian Comfort

886. Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort based on the level of crowding a pedestrian experience on the street.

887. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that these results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc).

888. Pedestrian Comfort Levels are graded A+ (Comfortable) to F (Uncomfortable) and a target of B+ is commonplace across the City. TfL's own guidance suggests that scores of C+ are acceptable for office and retail developments.

889. A PCL assessment has been undertaken on key footways and crossings within the local area based on thresholds set by TfL's 'Pedestrian Comfort Guidance for London' document.

890. A Pedestrian Comfort Level (PCL) assessment and pedestrian movement forecasts were carried out for the following footways and junctions:

- Old Broad Street eastern footway
- Wormwood Street southern footway
- Bishopsgate western footway
- Wormwood Street / Old Broad Street junction, southern crossing
- Wormwood Street / Old Broad Street junction, western crossing
- Wormwood Street / Bishopsgate junction, southern crossing
- Wormwood Street / Bishopsgate junction, western crossing

891. Four scenarios were modelled:

- Scenario 1: 2031 Future Baseline (without Development)
- Scenario 2a: 2031 Future with Development (without pedestrian route) – Conservative S278 works
- Scenario 2b: 2031 Future with Development (with pedestrian route) – Conservative S278 works

- Scenario 3: 2031 Future with Development (with pedestrian route) – Aspirational S278 works

892. The PCL assessment showed that a conservative footway extension on Wormwood Street, secured via S278 agreement, would ensure the PCL target of B+ was achieved on all analysed footways for the scheme. Without any intervention, the PCL score for the main pinch point on Wormwood Street would be an F, as is presented in Table 6.4 (Scenario 1) in the Transport Assessment.

893. In order to secure that an appropriate PCL rating is achieved on Wormwood Street, it is recommended that works to meet a minimum of the tested scenarios are secured through S278 agreement. The results demonstrate that with this intervention, the net uplift in walking trips expected can, from a pedestrian comfort perspective, be satisfactorily accommodated via the proposed pedestrian network and highways interventions.

894. The scope of the Section 278 works can be found later in this report. The indicative design of the highway would also align with the City's aspirations for the area (London Wall Corridor Study) and be fully funded by the developer. The proposals comply with the current Local Plan 2015, in particular policy DM16.2, ensuring acceptable pedestrian movements, and with the emerging City Plan 2040 policy S10 (Active Travel and Healthy Streets) and Policy AT1 (Pedestrian Movement, Permeability and Wayfinding).

Car parking

895. London Plan policy T6 (Car parking) states car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity, and Local Plan 2015 policy DM16.5 and the draft City Plan 2040 policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

896. Local Plan 2015 policy DM16.5 (2) states that designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements.

897. London Plan policy T6.5 (non-residential disabled persons parking) sets out that a disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. All proposals should include

an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

898. The existing building provides 23 car parking spaces at the first basement level. The existing trip generation assessment revealed that there were no trips associated with private cars. This is proposed to be removed and replaced with cycle parking and associated facilities.

899. Seven car club parking bays are located within a 960m radius of the development site. Four along A1202 Commercial Street, north east of the site, and two near Worship Street, north west of the site.

900. The nearest Taxi Rank is a TfL appointed one located outside Liverpool Street Station, north of the site. It operates 24 hours a day and accommodates 14 taxis.

901. Motorcycle parking bays within the local context are available around Finsbury Circus, which is operational 24 hours a day. Further motorcycle parking is available on Devonshire Square and Harrow Place.

902. The proposed scheme would be 'car free' in accordance with relevant policies, except for one on-site disabled parking bay located within the servicing area. Due to site constraints, the parking bay only has the full 1.2m clearance on the driver side and rear of the parking space.

903. The bay itself is provided in the form of a hybrid Blue Badge/delivery bay, where the bay is bookable for Blue Badge holders only from 7am to 7pm. In the event that a Blue Badge holder is not parked in the bay, it would be used as a typical delivery bay.

904. The Blue Badge bay would be bookable for use only by Blue Badge holders from 07:00 to 19:00 and used for deliveries between 19:00 and 07:00. Should building users with Blue Badges require use of the bay outside of these hours, it is considered that there is sufficient spare capacity across the loading bays to arrange for up to three additional hours of parking in the Blue Badge bay on any given day. This would be managed by facilities management in conjunction with the travel plan.

905. Following engagement with TfL, it is also proposed to provide an on-street Blue Badge bay on Old Broad Street, within the proposed extension of the Old Broad Street western footway. The location of this bay is subject to further discussion with CoL, consultations, feasibility studies, and road safety audits.

906. Policy T6 of the London Plan sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons' parking for Blue Badge holders is to be provided in accordance with Policy T6.5 for non-residential elements of the development. The proposals are also in accordance with the emerging City Plan 2040 Policy VT3 and the Local Plan 2015 Policy DM16.5.

Cycle Parking

907. London Plan Policy T5 (Cycling) requires cycle parking to be provided at least In accordance with the minimum requirements set out within the plan. Policy T5 also requires cycle parking to be designed and laid out in accordance with the guidance contained within the London Cycling Design Standards, and that developments should cater for larger cycles, including adapted cycles for disabled people. The emerging City Plan 2040 Policy AT3 also accords with London Plan Policy T5.

908. The table below shows the cycle parking requirements of the scheme according to the London Plan Policy Standards (2021) with that proposed:

Land Use	London Plan Requirement		Site Requirement	
	Long Stay	Short Stay	Long Stay	Short Stay
Class E(g) – Office	1 space per 75sqm GEA	1 space per 500sqm up to 5000 sqm, then 1 space per 5000sqm GEA	1988	39
Class F1(e)	1 space per 8 staff members	1 space per 100sqm GEA/100 staff	1	10
Class E(a/b)	1 space per 175sqm GEA	1 space per 20 sqm GEA	11	95
Total	**2,000**	**144**	**2000***	**144**

909. 144 short stay cycle parking spaces are proposed within the standalone public cycle hub, which meets the London Plan requirements. The spaces would be accessed via the publicly accessible ground floor of the cycle hub building, where a concierge service would be available for parking visitor's cycles on the first and second floors. Appropriate signage and wayfinding would be provided for the cycle hub for the benefit of office workers, visitors, and members of the public.

910. 1,600 long-stay cycle parking spaces are proposed within the basement, which equates to 80% of the London Plan requirement. As such, the proposal does

not currently meet the London Plan requirements, but the retention of the existing building raft and foundations has meant that the basements are very constrained, and the cycle parking provision has been designed around this.

911. The retention of the building shaft was agreed upon with CoL officers and TfL. Removing it would have a considerable impact on the embodied carbon and the design of the building. Therefore, Officers have agreed that such a departure from policy is sufficiently outweighed by not only the provision of a still significant number of cycle parking spaces, but that a public cycle hub is proposed which would deliver employment opportunities and a high-standard facility for bicycle maintenance services and repairs to the public.

912. The 1,600 long stay cycle parking spaces, housed within a dedicated facility, would be accessed via stairs with gullies from Bishopsgate, two lifts located within the cycle hub to the south-west of the building, or by the basement access ramp on Old Broad Street. 96 Sheffield stands would also be provided in level 2 of the cycle hub, which would be separated from the short stay cycle parking spaces.

913. The cycle parking mix for long stay spaces is presented in the table below.

Type of Cycle Stand	Proportion	Numbers
Enlarged Sheffield Stand	5%	80
Combination of 2 and 3 tier cycle stands	74%	1,184
3 tier folding bike lockers	15%	240
Sheffield stands	6%	96
Total	100%	1,600

914. In addition to the long-stay cycle parking spaces, the scheme proposes 195 showers, including 10 accessible WC/showers, and 1,320 lockers.

915. Accessible end-of-trip facilities would also be provided for cyclists using larger or adapted cycles, to be designed and implemented using LCDS guidance. Larger accessible cycle parking spaces would be located at the first basement level in the main cycle store for people using adapted and larger cycles. These spaces represent 5% of the overall long-stay cycle parking provision, the proportion of which is fully compliant with the London Plan.

916. Overall, despite the shortfall in long stay cycle parking spaces, Officers and Transport for London are in agreement that the constraints of the Site and benefits of the proposal outweigh the non-compliance with the London Plan requirements. The final design of the end-of-trip facilities and cycle parking facilities is secured by condition, and they should be designed using LCDS guidance as per London Plan Policy T5. This accords with the emerging City

Plan 2040 Policy AT3. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required by Section 106 obligation to produce a Cycling Promotion Plan as part of a Travel Plan, which is required to address both the long stay spaces and also ensuring public access to the short stay spaces. It would need to be submitted to the City for approval in line with the London Plan Policy T4.

Travel Plans

917. The emerging City Plan 2040, sets out "a strategy for the future planning of transport in the City of London which provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion."

918. It includes: "a long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements."

919. The travel plan would need to be approved by the CoL prior to the occupation of the development. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

920. It should set out a detailed strategy designed to encourage safe, healthy, and sustainable travel options. This would assist in supporting the trips generated from this proposed development and its impact on the highways network as an effective tool for managing visitors, volunteers, and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

921. In addition to the aforementioned, the travel plan should also be supporting disabled people of this development, through inclusive travel planning measures. Each disabled staff to have a tailored travel plan, on how they get to/from the site, and supported through different initiatives. Similarly, disabled visitors of this development, could request support to get to/from site, if the public transport is lacking to meet their needs. Not all underground stations nearby have step free access, which means until all stations nearby are step-free, some users of this development may require additional support. Measures such as arranging a pick up from nearby underground station, or other pre-arranged locations should be considered, and could form part of the travel plan measures.

922. If records show that on-street demand for disabled parking is higher than the available spaces nearby, the developer is obliged to provide additional travel plan measures to support parking needs for the disabled persons of this development.

923. With an expected uplift of over 2,500 trips generated from this proposed development, it is essential that the City seek to mitigate the impact on this development through requiring a Travel Plan. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

924. If planning permission is granted, a Travel Plan with a Cycling Promotion Plan, would need to be secured as part of the Section 106 planning obligation to meet London Plan policy T4, Local Plan Policy 16.1 and the emerging City Plan 2040 strategy Policy S9 and Policy VT1.

Construction Logistics

925. The London Plan, Policy T7 on deliveries, servicing and construction, the Local Plan 2015 and the emerging City Plan 2040, indicates that the development must address the impacts during the construction phase, and when the site becomes operational.

926. The detailed deconstruction/construction logistic plans shall be developed in accordance with TfL guidance per the latest standards and approved by CoL and TFL, prior to the start of the construction of this development.

927. A preliminary Construction Logistics Pan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which would need to be in line with TfL's Construction Logistics Plan Guidance.

928. The logistics arrangements would be developed in consultation with the City's Highways Licensing and Traffic Management teams and TfL to minimise the disruption to neighbouring occupiers and other highway users. TFL has raised the need of a temporary highways scheme (to be secured under a Section 278 Agreement and prior to the permanent works).

Oversailing & Undersailing

929. No permanent oversailing and undersailing have been identified at this stage as part of the planning submission. An oversailing application for the proposed Building Maintenance Unit (BMU) would be made following development of this element of the scheme design at a later design stage, and would be subject to highways licenses prior to its operation. A condition is also recommended requiring the BMU to be housed within its enclosure at all times when not in use.

Highway Boundary/Stopping Up and Adoption

930. There would be no stopping up of the public highway as a result of the development. The new route through the site would be designated as permissive path to ensure free and safe passage of pedestrians over the land for the majority of the year, save for maintenance purposes and to ensure the developer retains ownership rights over the land and it does not become a public right of way. The area around the perimeter of the building where the building line has been pulled back from the existing would be accessible to the public but would remain as private land.

City Walkways

931. To implement the proposals, the existing City Walkway (Wormwood Street to Bishopsgate) would need to be rescinded.

932. The City Walkway route (which is currently not in use), would be replaced by new pedestrian routes at ground level, which are fully accessible, and as above would be designated as permissive path to ensure the free and safe passage of pedestrians over the land in perpetuity, save for closure one day a year in order for the landowner to maintain ownership rights over the land.

933. The rescission of the City Walkway would form part of a separate process under the City of London (Various Powers) Act 1967.

Section 278 and Section 38 Highways Works

934. The future development would attract a substantial number of pedestrians to the area. As part of these proposals, plans to enhance the public areas and the highways within the vicinity of the site are included.

935. It is acknowledged that significant changes are ongoing in the area due to the construction of tall buildings, leading to an increase in pedestrian flows, which can currently be accommodated within the existing highways network but increased future demand from the completion of such developments requires significant improvement works to local highways infrastructure to accommodate the anticipated pedestrian numbers.

936. The necessary highway works to mitigate the impact of the development and improve the pedestrian experience (including post-construction) would be carried out as part of a Section 278/38 Agreement of the Highways Act 1980, in alignment with the City's requirements and aspirations for the area.

937. The works proposed to the public highway adjacent to the Site are (and are not limited to):

Wormwood Street/Old Broad Street

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials (Yorkstone or other approved material);
- Resurfacing of the carriageways adjacent to the site;
- Removal of redundant street furniture;
- Improvements to highways drainage;
- Provision of road markings and associated traffic orders;
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops, including rails to support rising; and
- Provision of greenery, if feasible.

Bishopsgate

938. The A10 Bishopsgate forms part of the TfL Network red route. The applicant would either need to enter into a Section 278 Agreement with TfL for all highways, walking, cycling, and public realm improvement works, or pay a sum of £900,000 towards the A10 safety, walking and cycling improvement project. This is in addition to a temporary Section 278 Agreement with TfL during the construction phase. This is all subject to final agreement by TfL.

939. A financial contribution towards the A10 safety, walking and cycling improvement project would be made. This has been calculated by TfL as £900,000. Further, if a £100,000 contribution for the extension to the Wormwood Street cycle hire docking station made to TfL by the developer cannot be used by TfL for such purposes, this sum would transfer over to the A10 improvement works contribution, totalling £1,000,000.

940. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy, and City of London's Public Realm vision. This would be secured through the Section 106 agreement, and an indicative plan is appended to this report (Appendix F).

Highways and Transportation Conclusion

941. Subject to the recommended conditions and planning obligations, the proposal would accord with relevant transport related policies including London Plan policies Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T6 Car Parking, T7 Deliveries, Servicing and Construction. It accords with the Local Plan 2015 Policy DM16.1, DM16.2, DM16.3, DM16.4, and DM16.5, as well as DM3.2 and London Plan Policy D11 Safety, Security, and Resilience to Safety. It also accords with the emerging City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. The proposals fail to comply with London Plan policy T5 Cycle Parking, but Officers and Transport for London consider that this is sufficiently outweighed by the constraints and benefits of the scheme. As such, the proposals are considered acceptable in transport terms.

Environmental Impact

942. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

943. 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.

944. 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.

945. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for

Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

946. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists. The City of London Lawson criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe. The threshold would be breached if wind speeds exceed 15m/s for more than 1.9 hours of the year (0.022% of the time).

947. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.

948. 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

949. There are also four criteria for determining the magnitude of change/impact to a receptor:

- Large: Safety exceedance
- Medium: two categories above criteria
- Small: one category above criteria
- Negligible: within suitable criteria.

950. Assessments have been carried out for both the windiest season and the summer season. Throughout design development, over 130 model options were tested. In the submission, there are eleven configurations that have been tested:

- Configuration 1: Existing site with existing surrounds and landscaping (Baseline);
- Configuration 2: Proposed development with existing surrounds (without mitigation measures);

- Configuration 3: Proposed development with existing surrounds, proposed on-site landscaping, and wind mitigation measures;
- Configuration 4: Existing site with Tier 1 cumulative surrounds (Future Baseline);
- Configuration 5: Proposed development with Tier 1 cumulative surrounds (without mitigation measures);
- Configuration 6: Proposed development with Tier 1 cumulative surrounds, proposed on-site landscaping, and wind mitigation measures;
- Configuration 7: Existing site with Tier 2 cumulative surrounds (55 Bishopsgate and 55 Old Broad Street) only;
- Configuration 8: Proposed development with Tier 2 cumulative surrounds (55 Bishopsgate and 55 Old Broad Street only) with existing off-site landscaping (without mitigation measures);
- Configuration 9: Proposed development with Tier 2 cumulative surrounds (55 Bishopsgate and 55 Old Broad Street only) with proposed on-site landscaping and wind mitigation measures;
- Configuration 10: Proposed development with Tier 3 cumulative surrounds (without mitigation measures); and
- Configuration 11: Proposed development with Tier 3 cumulative surrounds, proposed on-site landscaping, and wind mitigation measures.

951. The Tier 1 Assessment (configurations 4, 5 and 6) comprises 18 cumulative schemes in total which have either been granted or received resolution to grant. It is considered that Tier 1 Assessment represents a reasonable worst-case scenario given the small-scale nature and distance from the Site of the Tier 3 schemes.

952. The Tier 2 Assessment (configurations 7, 8 and 9) comprise the cumulative impact of the proposed development with only the consented schemes at 55 Bishopsgate and 55 Old Broad Street, given their proximity to the Site.

953. The Tier 3 Assessment (configurations 10 and 11) comprises all of the Tier 1 cumulative schemes (which includes 55 Bishopsgate and 55 Old Broad Street), with two additional cumulative schemes at 75 London Wall and 1 Appold Street. These two schemes were major developments but are of an overall small scale and in the case of 1 Appold Street, is at considerable distance from the Site, with a number of much taller obstructions between.

954. Because the proposed tower and pavilion buildings are over 50m AOD, both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing have been undertaken by independent experts.

955. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance, this would only be by one category and in either category the condition would remain suitable for its intended use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Wind conditions at street level – off-site

956. The following section will focus on the wind conditions at street level, that is off-site receptors, in each of the tested scenarios.

Baseline and Future Baseline - Configurations 1, 4 and 7:

957. In configuration 1 (existing site and existing surrounds) in the windiest season, wind conditions generally range from frequent sitting to walking use. There are isolated instances of uncomfortable conditions in Great St Helen's. There are also two safety exceedances, at the entrance into Great St Helen's and nearby areas along Bishopsgate (south), and Camomile Street junction with Bishopsgate (east).

958. The following conditions are observed in the windiest season in the baseline (configuration 1):

- Off-site thoroughfares – frequent sitting to walking range, suitable for intended use;
- Off-site entrances – majority standing and occasional sitting use, suitable for intended use. Isolated instances of uncomfortable condition, two categories windier than suitable for intended use, at 42-44 Bishopsgate;
- Off-site bus stops – occasional sitting and standing use, suitable for intended use;
- Off-site pedestrian crossings – occasional sitting to walking use, suitable for intended use;
- Off-site ground level amenity (benches) – majority occasional sitting in summer season, suitable for intended use. Benches at Tower 42 (south) and One Bishopsgate Plaza (northeast) vary between one and two categories windier than suitable for the intended use, between standing and walking use;
- Off-site ground level amenity (café) – majority frequent sitting in summer season, suitable for intended use. Some café style seating at Tower 42 would vary between one and two categories windier than suitable for intended use. North of 55 Old Broad Street experience one category windier than suitable for intended use. One Bishopsgate Plaza experiences between one and two categories windier than suitable for intended use. 64 Bishopsgate seating experiences two categories windier than suitable for intended use; and

- Off-site roof level amenity – frequent sitting and occasional sitting uses during summer season, suitable for intended use.

959. A number of safety exceedances (or near safety exceedances) of wind speeds greater than 15m/s have been observed in the baseline, as follows with receptor number in brackets and speed shown exceeding 1.9hrs per year (0.022% of the time):

- Bishopsgate Great St Helen's junction (3) – 14.7m/s
- Bishopsgate Great St Helen's junction (7) – **17.4m/s**
- Great St Helen's (8) – 14.9m/s
- Great St Helen's (22) – **15.6m/s**
- Great St Helen's (23) – 14.8m/s
- Great St Helen's (24) – **17.2m/s**
- Bishopsgate Great St Helen's junction (27) – 14.7m/s
- Bishopsgate (355) – 14.9m/s
- Bishopsgate (363) – 14.6m/s

960. In the future baseline (configurations 4 and 7), the wind tunnel test results show an increase in windiness compared to configuration 1 along Wormwood Street and Bishopsgate near Great St Helen's, showing that nearby cumulative schemes would have an adverse impact on these receptors without the proposed development in place. Any worsening of conditions with the proposed development in place (configurations 2, 3, 5, 6, 8, 9, 10, 11) is therefore consistent with consented cumulative schemes shown on their own in configurations 4 and 7.

961. Of particular note in configuration 4:

- Off-site throughfares through the north of 22 Bishopsgate would have uncomfortable wind conditions during the windiest season, not suitable for intended use;
- Entrance to 42-44 Bishopsgate would experience conditions one category windier than suitable for their intended use;
- Bench seating and café seating to Tower 42 would experience conditions one to two categories windier than suitable for their intended use;
- Café style seating at 55 Bishopsgate undercroft area would experience wind conditions two categories windier than suitable for their intended use;
- Café style seating at One Bishopsgate Plaza would experience wind conditions one category windier than suitable for intended use; and
- Café style seating at 64 Bishopsgate would experience wind conditions two categories windier than suitable for intended use.

962. Further, of particular note with regards strong winds (safety exceedances) comparing baseline (configuration 1) to future baseline (configuration 4):

- Bishopsgate Great St Helen's Junction (7) increases from 17.4m/s in baseline to 18.5m/s in future baseline;
- Great St Helen's (8) increases from 14.9m/s to 17.4m/s;
- Great St Helen's (22) decreases from 15.6m/s to 9m/s;
- Great St Helen's (23) increases from 14.8m/s to 16.5m/s;
- Great St Helen's (24) decreases from 17.2m/s to 15.8m/s;
- New exceedance introduced at Bishopsgate (291) at 15.1m/s.

963. Configuration 7, which tests the baseline with the two Tier 2 cumulative schemes in place with the existing 99 Bishopsgate, is broadly consistent with the baseline (config. 1) and tier 1 future baseline (config. 4). However, configuration 7 shows that the bus stop along Wormwood Street would experience conditions one category windier than suitable for the intended use with just 55 Bishopsgate and 55 Old Broad Street in place. As discussed below, these conditions remain with 99 Bishopsgate in situ, before mitigation, and so the impact of the proposed development on this bus stop can be considered consistent with the Tier 2 future baseline. Other than this specific receptor, all other receptors that would be windier than suitable for their intended use in configuration 7 are consistent with the existing and future baselines, with some minor changes to wind speeds at those receptors highlighted above that would experience safety exceedances in all baseline scenarios.

Demolition and Construction effects

964. The likely effects of nearby receptors from wind during demolition and construction have been assessed qualitatively, taking into account the baseline conditions described above and having regard to the CFD analysis of the completed proposed development. Demolition and construction activities are less sensitive to wind conditions (given their protection from site hoardings, and site access being restricted to site workers) than the completed development with full public access. There would be variety in the effects during demolition and construction given the phased nature of such works, and all effects would be temporary.

Operational effects – Proposed development with existing surrounds (Configurations 2 and 3 – with and without mitigation)

965. The results below primarily focus on configuration 2, discussing configuration 3 where relevant (where mitigation measures have been deemed necessary from the results outlined in configuration 2 or there are other changes in results between the two configurations).

966. For the proposed on-site receptors, all would be suitable for their intended uses or sufficient mitigated by the design of the proposed development, without the need for further specific mitigation measures. The on-site new thoroughfares would experience a moderate beneficial impact over the baseline, the effect of which is not significant.

967. Wind conditions off-site around the proposed development would range from frequent sitting to standing during the windiest season, with some isolated instances of walking use. The areas outlined above that are close to exceeding or exceed the safety threshold around Great St Helen's and Bishopsgate remain unaffected by the proposed development.

968. At nearby thoroughfares, conditions range from frequent sitting to walking use during the windiest season with the proposed development in place, which are suitable for their intended uses. These represent a negligible impact consistent with the baseline, and as such the effect is not significant.

969. Off-site thoroughfares to the west of St Botolph's Church Hall and to the south of 110 Bishopsgate would experience some walking use conditions during the windiest season, which would be one category windier than the baseline. This would represent a moderate adverse impact, but the effect of which is not significant as the conditions would remain suitable for their intended uses despite being windier, and mitigation measures would not be required.

970. The majority of off-site entrances around the proposed development would experience wind conditions ranging from occasional sitting to walking use during the windiest season, which is consistent with the baseline. The impact is negligible and the effect is not significant.

971. However, some locations at off-site entrances would experience conditions different to the baseline. At Great St Helen's, the conditions would be one category windier than the baseline, representing a moderate adverse effect where the effect is not significant as the conditions remain suitable for their intended use.

972. The off-site entrance to 42-44 Bishopsgate would experience walking use conditions which is one category calmer than the baseline, representing a negligible effect that is not significant.

973. Measurement location 62 on Old Broad Street would experience walking use conditions, one category windier than the baseline and not suitable for the intended use, representing a major adverse impact, the effect of which is significant. Therefore, mitigation measures are required as shown in configuration 3, which reverts the receptor to being suitable for its intended use and the effect therefore becomes no longer significant.

974. The nearby bus stops on-and-off-site would see standing use conditions, experiencing a negligible (not significant) effect.

975. Nearby pedestrian crossings would see standing and walking use conditions during the windiest seasons, consistent with the baseline and representing a negligible (not significant) effect. To an isolated number of locations around Wormwood Street, crossings would experience conditions one category windier than the baseline which represents a moderate adverse impact. However, conditions would still remain suitable for their intended use, so the effect is not significant and mitigation is not required.

976. For off-site ground level amenity areas in the summer, the receptors would experience occasional and frequent sitting use wind conditions in configuration 2 and 3, which is either consistent with or calmer than the baseline representing a negligible (not significant) effect. There are some receptors at St Botolph's Church Hall that would experience standing use conditions in the summer season, one category windier than the baseline. Although a moderate adverse impact, the effect is not significant as they remain suitable for their intended uses and mitigation is not required.

977. Finally, off-site terrace conditions would experience frequent and occasional siting use in the summer season, suitable for their intended uses, which is either consistent with or calmer than the baseline. The roof level amenity area at 55 Bishopsgate would be one category windier than the baseline (occasional sitting), but remains suitable for its intended use so the moderate adverse impact is not significant and mitigation measures are not required.

978. The strong winds outlined above would change slightly in configurations 2 and 3, as follows, but these are considered marginal:

- Bishopsgate Great St Helen's junction (3) – increase by 0.3m/s in config. 2
- Bishopsgate Great St Helen's junction (7) – increase by 0.4m/s overall (0.3m/s in config. 2)
- Great St Helen's (8) – increase by 0.9m/s overall (0.2m/s in config. 2)
- Great St Helen's (22) – increase by 0.1m/s overall (0.3m/s in config. 2)
- Great St Helen's (23) – increase by 0.8m/s overall (1m/s in config. 2)
- Great St Helen's (24) – decrease by 2.6m/s overall (2.4m/s in config. 2)
- Bishopsgate Great St Helen's junction (27) – increase by 0.4m/s overall (0.5m/s in config. 2)
- Bishopsgate (355) – increase by 0.4m/s overall (0.9m/s in config. 2)
- Bishopsgate (363) – increase by 0.5m/s overall.

979. There is good general agreement between the wind tunnel test (results outlined above) and the CFD results. One difference is that the major adverse

(significant) effect identified in configuration 2 is recorded as a negligible (not significant) effect in the CFD assessment.

Operational effects – Tier 1 Cumulative (Configurations 5 and 6)

980. Configurations 5 and 6 represent the proposed development with Tier 1 cumulative schemes with and without mitigation measures. In particular, configuration 5 represents a reasonable worst-case scenario given the lack of mitigation on site and the tier 1 cumulatives being those most likely to have a significant impact upon the results.

981. To off-site receptors, configuration 5 is consistent with configuration 2, showing that the majority of off-site receptors would experience wind conditions suitable for their intended use year-long, or would be consistent with or calmer than the future baseline (configuration 4). As such, this is considered negligible to moderate adverse, with non-significant effects.

982. Some off-site thoroughfares, in particular those to the north of 22 Bishopsgate near Great St Helen's, would see uncomfortable conditions during the windiest season. However, this is consistent with the future baseline (config. 4), showing that it is neighbouring developments that would cause the bulk of this impact, and therefore the proposed development itself would have a negligible impact and the effect is not significant.

983. The bus stop to the north of the Site along Wormwood Street would experience uncomfortable conditions during the windiest season, three categories windier than the future baseline, which is a major adverse impact and the effect is significant. However, with mitigation measures in place (configuration 6), the bus stop then reverts to wind conditions suitable for the intended use and the significant effect is removed.

984. The strong winds identified in the earlier configurations remain around Great St Helen's and 22 Bishopsgate, consistent with the future baseline. However, there would be a new safety exceedance to Wormwood Street and within the 55 Old Broad Street proposed undercroft in configuration 5, representing a significant effect. The ES notes this is mainly due to prevailing winds from the west and southwest, and downwash and acceleration of wind around the corner of the proposed development. In configuration 6, with the mitigation measures introduced, these strong winds are removed and the effect is no longer significant.

985. There is broad overall agreement between the wind tunnel tests presented above and the CFD results for configuration 5. They do, however, disagree on the level of impact to Wormwood Street, with the WTT concluding major

adverse (significant), and the CFD concluding negligible (not significant). Within the new pedestrian passageway to 55 Old Broad Street, the CFD analysis shows additional localised instances of uncomfortable conditions and strong winds at the entrance to the passageway. This is without mitigation in place and it is also considered that the locations identified are ones in which pedestrians and cyclists would not dwell.

986. Configuration 6 is considered the most reasonable assessment given that the proposed development would have suitable mitigation measures in place, whilst also highlighting the impact that surrounding cumulative schemes continue to have on wind microclimate to nearby receptors.

987. Configuration 6 is consistent with configuration 2, being that the majority of off-site receptors would experience wind conditions suitable for their intended use, and/or wind conditions would be consistent with or calmer than the future baseline (config. 4).

988. The strong winds previously identified around Great St Helen's and 22 Bishopsgate would remain consistent with configuration 5. There would be no strong wind exceedances to two areas under the 55 Bishopsgate undercroft with the mitigation measures in place, which is negligible (not significant).

989. The aforementioned impacts to Wormwood Street and the 55 Bishopsgate undercroft would be sufficiently mitigated through the proposed measures, resulting in an improved wind environment over configuration 5, with only one location remaining with winds over the 15m/s threshold. This, however, is only a marginal exceedance of 15.5m/s, and Officers consider this has been appropriately balanced against introducing or retaining worse wind conditions elsewhere across the Site and to nearby off-site receptors.

990. It is also recognised that the landscaping proposals to 55 Bishopsgate as part of the planning permission are modelled on the boundary wall between that site and 99 Bishopsgate remaining, which of course would not be the case if and when 99 Bishopsgate was to progress with construction should planning permission be granted.

991. As part of the 55 Bishopsgate permission, it was written into the S106 agreement that should 99 Bishopsgate come forward, the landscaping proposals along the boundary wall between the sites should be amended to facilitate permeability between the sites. This would therefore change the modelled landscaping for the purposes of the wind assessment.

992. As part of the proposed development's mitigation strategy, off-site landscaping in the undercroft of 55 Bishopsgate was modelled and altered to reduce down

washing and channelling of winds from the west. Reducing obstructions in this area through the mutual requirement in the S106 agreement to encourage permeability would sufficiently mitigate the windy conditions in this area to a point where the safety exceedances would be removed and the impact would be negligible.

993. Overall, strong wind exceedances in configuration 6 would be similar to the future baseline when all mitigation measures are in place.

Operational effects – Tier 2 Cumulative (Configurations 8 and 9) and Tier 3 Cumulative (Configurations 10 and 11)

994. The results of the Tier 2 and Tier 3 cumulative assessments are significantly similar to those of Tier 1, assessed above. There are some instances where the results are different, but they are all considered negligible or would be removed with all appropriate mitigation measures (to 99 Bishopsgate and surrounding cumulative schemes) being in place.

995. Overall, it is considered that the worst-case scenarios as a result of the proposed development have been adequately assessed through the configurations tested, and show that the proposed development would not have a materially worse effect than other nearby consented schemes with mitigation measures in place. The results presented are therefore consistent with the future baseline scenario or can be adequately mitigated.

Wind conditions on-site

996. Wind conditions on-site, including for thoroughfares, boundaries, and the upper-level terraces, have been assessed in all tested configurations.

997. On-site, all wind microclimate effects are either considered negligible or moderate beneficial (not significant) and all are suitable for their intended uses.

998. Mitigation measures are proposed on-site to ensure that the receptors remain suitable for their intended uses. These include: inclusion of the proposed landscaping scheme at ground level, inclusion of landscaping to terraces, 3m tall screens on the roof of the pavilion building, replacing 2 deciduous trees with evergreen trees at each terrace, and the inclusion of 1.5m tall hedging that is 2m wide between the western and eastern sections of landscaping to the terraces. These are all secured by condition.

Wind Microclimate Conclusion

999. Overall, the wind microclimate impact of the Proposed Development with proposed landscaping is considered to be acceptable. The vast majority of residual effects are not significant, with only one remaining in the worst-case (Tier 1) scenario, within the 55 Bishopsgate site. However, with the mutual requirement to coordinate the boundary treatment should both sites come forward, and the removal of obstructions to allow for permeability, this safety exceedance and significant effect would be removed. There are a number of residual significant effects in the Tier 2 and Tier 3 scenarios, which are the result of surrounding neighbouring developments (consented), to which the proposed development at 99 Bishopsgate would not have a materially different or worsened effect. There are also a number of moderate beneficial impacts as a result of the proposed development when compared with other Tier 1 schemes, including along Camomile Street and at the Bishopsgate Junction where conditions for cyclists travelling east would be safer, and which are welcomed.

1000. A number of objections have been received regarding the wind microclimate impact to the St Ethelburga's Centre for Reconciliation and Peace, and in particular the Peace Garden, which sits to the east of the Site. The objections refer to the potential for strong winds outside St Ethelburga's, and allege that the 'wind modelling has not taken into account the fragility of [the] Grade I listed building, nor [its] unique situation'. Further, the objection alleges that the church has 'noticed a wind tunnel effect between St Ethelburga's and the adjacent 100 Bishopsgate building… the wind force caused by the tunnelling effect has already caused significant damage to [the] building' and that the church 'have been forced to board up one of the large windows in the Nave because it was buckling under the force of the wind'.

1001. Whilst this is noted, Officers do not have any evidence as to the severity of the wind tunnel effect and its impact on the church windows to the Nave. Nonetheless, Officers acknowledge that the existing wind microclimate along Bishopsgate is particularly windy, noting as above the strong winds experienced in the baseline scenario. These existing winds of course cannot be attributed to the Proposed Development.

1002. It is noted that the Applicant has undertaken both CFD tests and Wind Tunnel Tests which provide a holistic, realistic prediction of wind speeds and occurrences as a result of the Proposed Development. These tests, which are conducted separately by independent experts and cross-checked as part of the Environmental Statement, have shown that the Proposed Development would have a negligible impact to wind along Bishopsgate when compared with the future baseline – that is, that other consented developments would have a similar impact even if the Proposed Development was not granted and built. Further, the results show that all spaces around St Ethelburga's would remain suitable for their intended uses, in line with the City of London Wind

Microclimate Guidelines. Overall, the Proposed Development would not have a material or harmful impact on St Ethelburga's in this respect.

1003. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the Local Planning Authority, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.

1004. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan 2040 policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight and Overshadowing

Policy Context

1005. 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.

1006. 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.

1007. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable standards of daylight and sunlight taking account of the Building Research Establishment's guidelines.

1008. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states that when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative impact of development proposals.

Assessment methodology

Daylight and Sunlight

1009. The BRE guidelines “Site layout planning for daylight and sunlight – A guide to good practice” (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

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

Overshadowing

1010. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG) and transient overshadowing. The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

1011. **Sun Hours on Ground** is undertaken on the equinox (21st March and 21st September), and tracks the sun’s path to determine where the sun would reach the ground and where it would not. It is recommended that at least half an amenity area should receive at least 2 hours of sunlight at the equinox, or that it should not be reduced to less than 0.8 times its former value.

1012. **Transient overshadowing** consists of a series of shadow plans illustrating the location of shadows cast from the proposed buildings at different times of day and year. This includes 21st March (spring equinox), 21st June (summer solstice), and 21st December (winter solstice).

Interpreting results

1013. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable, or negligible. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

1014. With regards the impact of a development on overshadowing, as above it is recommended that at least half the area should receive at least two hours of sunlight on the equinox, OR that it should not be reduced by 20% from the baseline.

Assessments undertaken

1015. An assessment of the impact of the development on daylight, sunlight and overshadowing to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE7 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.

1016. An assessment of Daylight Illuminance or ‘radiance’ has also been undertaken for the properties to Wormwood Street. This method provides a more detailed assessment that includes the main factors that affect the daylight appearance of a room including the area of sky visibility, the area of the windows serving the room, the glazing transmittance, the size and shape of the room, reflectance from external surfaces including the proposed development and the internal reflectance of the room, as well as considering climatic data for the site location. The BRE proposes daylight illuminance as a test only for new build accommodation where these design factors are commonly available, but reasonable estimates can be taken from the BRE guidance and applied to

existing neighbouring residential rooms. BRE recommends targets of at least 150 lux for a living room, 100 lux for a bedroom, and 200 lux for a habitable kitchen; no criteria based on relative change and its impact is provided in the BRE guidelines, as this criteria has mainly been set for new build rooms rather than applying this methodology to assessing the impact on existing neighbouring residential properties. Therefore, as the assessment has been applied to the neighbouring properties, Officers consider that the same negligible, minor, moderate, and major categories for relative change for the more traditional assessments is suitable, and has been adopted here.

1017. Three scenarios have been tested: (1) Existing Baseline; (2) Proposed Development with existing surrounds; and (3) Cumulative Assessment.

1018. The residential buildings to be considered are those at:

- 3 flats within 33 Great St Helen's
- 4 flats at 50 Bishopsgate
- 1 flat at 26 Wormwood Street
- 3 flats at 25 Wormwood Street
- 8 flats at 10 Wormwood Street

1019. The religious, educational or community receptors to be considered are those at:

- St Helen's Church Bishopsgate
- St Ethelburga's Centre for Reconciliation and Peace (78 Bishopsgate)
- St Botolph Without Bishopsgate
- All Hallows-on-the-Wall

1020. An assessment for the following eleven neighbouring amenity areas with regards overshadowing has also been undertaken:

- Finsbury Circus Gardens
- 5 terraces at 100 Liverpool Street
- St Botolph-without-Bishopsgate Gardens
- Jubilee Gardens
- 3 areas at Devonshire Square.

1021. Finally, an assessment has been undertaken of the commercial 'apart-hotel' at 48 Bishopsgate.

Assessment of impacts

1022. When referring to the degree of adverse 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. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse

impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement. In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE7), it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

1023. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms in adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include places of worship, schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight.

1024. In this case, Officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and Officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight and Sunlight

1025. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is

the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC of the NSL guidelines are not met.

1026. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

1027. Both the London Plan 2021 and Local Plan 2015 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered when considering any reductions in daylight and sunlight assessed under the BRE methodology.

Existing Baseline results

1028. A total of 10 buildings have been considered as sensitive receptors and assessed in the baseline. Within these 10 buildings, there are 219 windows serving 54 rooms.

1029. In the baseline condition across all properties tested, none of the 219 windows tested would receive the BRE recommended levels of 27% VSC. Only 15 of the 54 rooms tested for NSL would receive the BRE target of 80% NSL.

1030. With regard sunlight for these properties in the baseline, there are 8 relevant buildings facing within 90-degrees of the proposed development to be considered. There are 132 windows, of which none would meet the BRE criteria of 25% APSH of which 5% is during winter (WPSH) in the baseline. Of these 132 windows, 37 (28%) would see reductions of less than 20% their former value, meeting the BRE criteria.

1031. As such, it is evident that the locality is significantly affected by the existing context of tall buildings in the baseline, consistent with the dense urban environment of the City.

Proposed development and cumulative impacts

1032. Para 10.108 of the Environmental Statement Volume 1 outlines that during the design evolution process, the massing of the proposed development evolved in response to initial assessments on daylight and sunlight potential effects, to mitigate where practicable.

1033. When comparing the proposed development to the baseline, 118 out of 219 total windows tested would meet the BRE guidelines for VSC, that is a reduction of no greater than 20%. This equates to 54.9% compliance.

1034. In this same scenario, of the 54 total rooms tested for NSL, 30 would meet the BRE guidelines being a reduction of no greater than 20%. This equates to 55.6% compliance.

1035. Three of the ten buildings assessed would meet the BRE criteria for both VSC and NSL and as such would experience a negligible impact where the effect is not significant. These are St Helen's Bishopsgate, 50 Bishopsgate, and All Hallows-on-the-Wall.

1036. The assessment below will therefore focus on the seven buildings with windows/rooms that see a reduction in VSC and/or NSL as a result of the proposed development.

1037. Radiance, or daylight illuminance, was undertaken as requested for the three residential buildings at 10, 25 and 26 Wormwood Street. 33no. habitable rooms were tested. It is noted that all 33 rooms experience Median Daylight Factor (MDF) values below the BRE criteria for their target lux levels in the existing scenario (baseline). Therefore, the impact over and above these low existing values attributable to the Proposed Development has been assessed. With the Proposed Development in place, 16 of these rooms would experience no change. A further 12 rooms would experience a very small absolute change to MDF of between 0.1 and 0.2%. The remaining 5 rooms would experience a small absolute change in MDF of 0.3 to 0.4%. Considering that none of the rooms tested meet the BRE criteria for their target lux levels in the baseline, the Proposed Development would have a negligible impact on the available daylight illuminance to these properties. The overall daylight and sunlight impact to these properties is discussed below.

1038. For sunlight, of the 132 relevant windows tested, 37 (28%) would see reductions of less than 20% their former value, meeting the BRE criteria. This equates to four of the eight tested buildings – St Helen's Bishopsgate, 33 Great St Helen's, 78 Bishopsgate (St Ethelburga's), and All Hallows-on-the-Wall.

33 Great St Helen's

1039. 33 Great St Helen's is a residential building located southeast of the Site. It features 11 windows that serve 4 rooms. Layouts have been obtained by the Applicant and these show that the rooms are three bedrooms and one living room.

1040. For VSC, 10 of the 11 windows (90.9%) would meet the BRE criteria and therefore would experience a negligible impact.

1041. The remaining window that would be affected would experience an alteration in VSC of 27.8%, which is only marginally beyond the target criteria and as such is considered a minor adverse impact. Using a weighted mean of VSC to the room instead of the window, the assessment shows that the room overall would meet the BRE criteria with its mitigating windows.

1042. For NSL, all rooms would meet the BRE criteria, which is a negligible impact.

1043. For sunlight, all windows tested meet the BRE criteria for APSH.

1044. Overall, for 33 Great St Helen's in the existing versus proposed scenario, there is a high level of BRE compliance, and considering the negligible-to-minor adverse impact, the effect is not significant.

1045. In the cumulative scenario, 33 Great St Helen's, which is located 60m to the east of the consented 55 Bishopsgate development, there would be a moderate adverse (significant) effect for both daylight and sunlight. The change from negligible-minor adverse impact (daylight) and BRE compliant (sunlight) in the existing versus proposed scenario to the moderate adverse impact in the cumulative scenario shows that 55 Bishopsgate would have a larger impact than the Proposed Development.

1046. An objection has been received from The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London with regards the daylight and sunlight impact to 33 Great St Helen's. The letter notes that in the cumulative scenario, citing paragraph 10.272 of the ES (Volume 1), that there would be a 'major adverse impact' with significant effect to the property. Officers note that the effect as at 10.272 of the ES is 'moderate adverse' as described and assessed above. The letter goes on further to state that 'whilst this establishes clear planning harm, it is also an infringement of private law rights to light by creating a substantial interference with the use and enjoyment of [the] properties'.

1047. Officers wish to note that rights to light is not a material planning consideration, and as the letter rightly points out, is a matter of private law. The potential for interference into use and enjoyment of the property is assessed in the Human Rights Act section of this report.

1048. Overall, as above it is considered the impact to 33 Great St Helen's is negligible-minor adverse where the effect is not significant. The impact is therefore acceptable.

St Botolph-without-Bishopsgate

1049. St Botolph-without-Bishopsgate is a Grade II* listed church of the late 1720s, that is located to the north of the Site.

1050. The submitted analysis has assessed the nave, two mezzanines and a tower room. A total of 50 windows serving 4 rooms have been assessed.

1051. For VSC, 34 out of the 50 windows (68%) would meet the BRE criteria.

1052. Of the remaining 16 windows, two would experience a minor adverse alteration (between 20-29.9%), two would experience a moderate adverse alteration (between 30-39.9%). The remaining 12 windows would experience a major adverse impact, that is an alteration of more than 40%.

1053. Of these 12 windows, all of them receive less than 10% VSC in the baseline scenario, meaning that any percentage reduction as a result of the proposed development appears disproportionately large. When considering the absolute values of the losses, these are between 2.2% and 4%, which are unlikely to be perceptible by occupants. Further, when using the weighted mean for the rooms affected by these windows, all rooms overall would meet the BRE criteria.

1054. The building features stained glass above the altar which faces east. The stained-glass window would meet the BRE criteria.

1055. For NSL, all rooms assessed meet the BRE criteria.

1056. For sunlight, of the 23 windows tested, 7 would meet the BRE criteria for both APSH and WPSH. Of the remaining 16, one would see a minor alteration, three would see moderate alterations, and 12 would see major alterations above 40% for APSH.

1057. Most of these windows serve the Nave, which also has multiple windows that are unaffected by the proposed development with regards sunlight. The room as a whole would meet the criteria, when using a weighted mean the room would meet the 25% APSH target.

1058. For WPSH, 10 windows would see a major alteration above 40%, with 13 of the 23 windows meeting the criteria (56.5%). Of the 10 windows seeing major impacts, the WPSH is extremely low in the baseline (between 1-3%) so the percentage alterations appear disproportionate. In absolute terms, no window would see more than a 3% loss of WPSH.

1059. Overall, in the existing versus proposed scenario, with regards daylight the percentage alterations would equate to a minor to moderate adverse impact where the effect is significant. However, Officers consider that the impact is acceptable given the overall room compliance for both VSC and NSL, and it is important to note that the stained glass would be unaffected. With regard to sunlight, the effect is considered minor adverse (not significant).

1060. In the cumulative scenario, the overall impact to this property is raised from minor-moderate adverse to major adverse (significant) for both daylight and sunlight, showing that the majority of impacts to this property would be from the consented schemes at 55 Bishopsgate and 1 Undershaft.

1061. A letter of objection from the London Diocesan Fund has been received in respect of daylight and sunlight impacts to St Botolph (along with St Ethelburga's and All Hallows on-the-Wall). The letter notes that the impact of the Proposed Development to St Botolph's is minor to moderate adverse, which is correct. However, as assessed above, when testing the room rather than individual windows, there is overall compliance for both VSC and NSL. The impact is considered acceptable, particularly when compared with the future baseline scenario which shows that surrounding developments would have a much larger impact than the Proposed Development.

48 Bishopsgate

1062. 48 Bishopsgate is a property located to the south of the site. It is commercial at ground floor, with aparthotel rooms from first to fourth floors. Apart-hotels and hotels are considered less sensitive to daylight and sunlight impacts that traditional residential properties. A total of 13 windows serving five rooms were assessed.

1063. For VSC, 92.3% of the windows would meet the BRE criteria, producing a negligible impact.

1064. The one remaining affected window would see a VSC reduction of 23.8%, which is considered a minor reduction. In the baseline results, this window only received a VSC value of 6.3%, well below the target of 27%, so any reduction is therefore seen as disproportionately large. The absolute change would only be 1.5%, which is unlikely to be perceptible.

1065. For NSL, all rooms assessed meet the criteria.

1066. This property features no windows that are within 90-degrees of due south of the proposed development so has not been tested for sunlight.

1067. Overall, in the existing versus proposed scenario, considering the transitory nature of the apart-hotel and the overall high compliance, the effect would be negligible to minor adverse (not significant).

1068. In the cumulative scenario, where this property is located just 20m away from the 55 Bishopsgate consented development, the impact to 48 Bishopsgate would be increased from negligible-minor in the existing versus proposed scenario to major adverse (significant) for daylight and sunlight. This impact can be attributed to 55 Bishopsgate rather than the Proposed Development.

26 Wormwood Street

1069. 26 Wormwood Street is a mixed-use property located immediately north of the application site. It is in commercial use at ground floor with one flat above, set over three floors with one room served by one south elevation window per floor, and is dual aspect. The rooms that face north of the proposed development have not been assessed as they would be unaffected. As such, in total three windows serving three rooms have been assessed.

1070. For VSC, all three windows would experience a major adverse impact, experiencing losses of more than 40%. However, each window sees VSC values of below 10% in the baseline, so any reasonable massing increase on the Site would appear to disproportionately affect the windows.

1071. Of the impacted windows, based on the obtained floor plans, one of the windows serves a galley kitchen only 3.6sq.m in size, which is considerably below the usual criteria of 15sq.m for a habitable room. The remaining two windows serve bedrooms which are considered less important than primary living spaces with regards daylight.

1072. For NSL, all rooms would see losses of above 40%, a major adverse impact. To supplement this assessment, radiance based median daylight factor (MDF) studies have been undertaken. This shows that in the existing baseline, none of the rooms tested meet the target lux values. The development would have small absolute changes to MDF of between 0% and 0.2%, which is unlikely to be perceptible.

1073. With regards sunlight, three windows were assessed, and none would meet the criteria for either APSH or WPSH. One would experience a moderate adverse impact, and two would experience a major adverse impact of losses of more than 40% APSH.

1074. For WPSH, one of the three windows would meet the criteria. The remaining two windows would see major adverse losses, but in the existing scenario

experience very low existing WPSH values of 1%, so any change appears disproportionate to what would actually be experienced. Further, one of the windows serves a small galley kitchen which is too small to be considered a habitable room, and the remaining two windows serve bedrooms which have a lesser requirement for sunlight.

1075. Overall, in the existing versus proposed scenario, the impact to this residential unit is considered major adverse, where the effect is significant. However, Officers note that given the proximity of the property to the Site, any reasonable and relatively minor increase in massing over the existing would likely lead to major adverse losses, especially considering the low existing values. Further, the losses are mitigated by the fact that the property is dual aspect with supplementary windows that would be unaffected by the proposed development, and the rooms in question are either too small to be considered habitable, or are bedrooms which have lesser requirements for light.

1076. In the cumulative scenario, there is no change to the scale of losses that would be experienced by this property. The cumulative effect remains major adverse (significant).

25 Wormwood Street

1077. This is a mixed-use property to the north of the Site, comprising a commercial unit at ground floor, and three residential units above. The flats are dual aspect with windows to the north that would be unaffected by the proposed development. As such, a total of 14 windows serving 6 rooms were assessed.

1078. For VSC, all 14 windows would see major adverse losses of above 40%. Three of these windows serve galley-kitchens that are only 3sq.m in size, which is too small to be considered habitable. The remaining 11 windows serve three rooms. Nine of these experience VSC of less than 10% in the baseline, with the further two experiencing VSC of 12% in the baseline. These are relatively low values when compared to the BRE VSC target of 27%, and as such any impact appears disproportionately large.

1079. For NSL, all 6 rooms assessed would experience major adverse losses of above 40%. Three of these six rooms are galley kitchens that are too small to be considered habitable. The remaining three rooms are living rooms.

1080. Considering that three living rooms (habitable rooms) would experience major adverse losses, the effect is considered significant. To supplement this assessment, radiance based median daylight factor (MDF) studies have been undertaken. This shows that in the existing baseline, none of the rooms tested meet the target lux values. The development would have small absolute

changes to MDF of between 0.2% and 0.4%, which is unlikely to be perceptible.

1081. Officers note, however, that the proximity of this property to the proposed development again means that any reasonable increase in massing on the Site was likely to have adverse impacts on light levels received by these flats, which is consistent with the dense urban environment of the Cluster.

1082. With regards sunlight, 14 windows were assessed, and none would meet the BRE criteria for APSH or WPSH. All windows see losses of over 40%, which is considered major adverse. Three windows serve small galley-kitchens which have a lesser requirement for sunlight.

1083. For WPSH, six of the 14 windows would meet the criteria, experiencing a negligible impact. The remaining 8 windows would see losses of over 40%, major adverse. Of these 8 windows, two serve small galley kitchens.

1084. Overall, in the existing versus proposed scenario, the effect is considered to be major adverse (significant) with regards sunlight, with Officers noting that some rooms are considered not habitable for long periods due to their small size.

1085. In the cumulative scenario, there is no change to the scale of losses that would be experienced by this property. The cumulative effect remains major adverse (significant).

10 Wormwood Street

1086. 10 Wormwood Street is a mixed-use property to the immediate north of the Site. It is commercial at ground floor with 8 dual aspect flats on the first to fourth floors. 68 windows serving 24 rooms were assessed.

1087. With regards VSC, eight of the 68 windows (11.8%) would meet the BRE criteria. The remaining 60 windows would experience major adverse losses of above 40%.

1088. Each of these windows receives very low existing values in the baseline, all of less than 10% VSC.

1089. Using a weighted mean for the rooms as a whole, 8 out of the 24 rooms would meet VSC criteria overall, and all of these rooms are considered to be habitable (living/dining rooms).

1090. All of the remaining 14 rooms are bedrooms which have a lesser requirement for daylight as secondary living spaces.

1091. For NSL, nine of the 24 rooms tested (37.5%) would meet the BRE criteria.

1092. Of the remaining 15 rooms, one would experience a moderate adverse impact and 14 would experience major adverse losses of above 40%. Of these rooms, one is known to be a small galley-kitchen, and the remaining 14 rooms are bedrooms.

1093. Overall, for daylight the impact is considered major adverse where the effect is significant in the existing versus proposed scenario. To supplement this assessment, radiance based median daylight factor (MDF) studies have been undertaken. This shows that in the existing baseline, none of the rooms tested meet the target lux values. The development would have small absolute changes to MDF of between 0% and 0.2%, which is unlikely to be perceptible.

1094. With regards sunlight, 60 windows were assessed, none of which would meet the BRE criteria for APSH and WPSH.

1095. Of the 60 windows, three would experience minor losses, 15 would experience moderate losses, and 42 would experience major losses.

1096. Of these 60 windows, 28 serve small galley kitchens of less than 3sq.m, or bedrooms. Both of these room types have a lesser requirement for sunlight.

1097. For WPSH, 35 of the 60 windows would meet the criteria, experiencing a negligible impact. The remaining 25 windows would see major losses of above 40%. Of these 25 windows impacted in winter, 15 have existing very low values of WPSH (1%), nine have existing low values of 2%. These very low existing values result in a disproportionate effect with any losses incurred as a result of the proposed development.

1098. Overall, in the existing versus proposed scenario, for sunlight the impact is considered major adverse and the effect is significant, with Officers noting the use, small size, and existing low levels of sunlight.

1099. In the cumulative scenario, there is no change to the scale of losses that would be experienced by this property. The cumulative effect remains major adverse (significant).

St Ethelburga's Centre for Reconciliation and Peace (78 Bishopsgate)

1100. St Ethelburga's Centre for Reconciliation and Peace is a religious property to the southeast of the Site. It contains a garden to the rear (east) known as the Peace Garden.

1101. A total of 18 window serving one room were assessed. For VSC, 12 out of the 18 windows (66.7%) would meet the BRE criteria.

1102. Of the remaining 6 windows, four would experience a moderate alteration of between 30-39.9%, and two would experience a major alteration of above 40%.

1103. The baseline assessment shows relatively low existing values of 10.7% to 11.9%, to be expected from the dense urban environment. The absolute changes to the four windows experiencing moderate adverse impacts would be between 3.6% and 4.4%, which is considered small and only negligibly perceptible to occupiers. The remaining two windows are primarily due to very low existing VSC values of 0.3% and 0.7%. The absolute changes to these windows would be 0.2% and 0.7%, which would not be perceptible.

1104. Using a weighted mean for the one room as a whole, it would see a VSC reductio of 20.9%, which is considered minor adverse and only marginally over the criteria of 20% where under this the change would not be perceptible.

1105. For NSL, all rooms assessed would meet the BRE criteria.

1106. For sunlight, St Ethelburga's would meet the BRE criteria.

1107. Overall, the impact to St Ethelburga's is considered to be minor adverse where the effect is not significant in the existing versus proposed scenario.

1108. In the cumulative scenario for daylight, the impact to St Ethelburga's is raised from minor adverse to moderate adverse (significant), with the impacts stemming from 55 Bishopsgate and 1 Undershaft. There is no change to the impact on sunlight.

1109. As above, a letter of objection has been received from the London Diocesan Fund with regards the daylight, sunlight and overshadowing impact to St Ethelburga's, as well as a number of other related objections including from St Ethelburga's Centre for Reconciliation and Peace themselves.

1110. The latter states that they believe the applicant has not had proper consideration for the rights to light of the church, and that the church would be overshadowed that would severely impact the fragile ambience of the church and garden. The letter also states that the church has not been considered in the radiance assessment.

1111. As above, rights to light is not a material planning consideration and is a civil law matter. Overshadowing is discussed below. The church was not considered in the radiance based MDF assessment as the Proposed Development would only cause a minor adverse impact to the church, which is unlikely to be perceptible, whilst noting that the church has low levels of light as existing. Further, other consented neighbouring developments, including 55 Bishopsgate, would have a larger impact on the amount of available light to the church than the Proposed Development. Overall, the impact is acceptable.

All Hallows on-the-Wall

1112. This religious property to the north west of the Site would meet the BRE criteria for daylight, as above.

1113. For sunlight, 7 windows were assessed, four of which (57.1%) would meet the BRE criteria for APSH and WPSH.

1114. For APSH, all windows assessed meet the criteria, a negligible impact.

1115. For WPSH, four of the seven windows would meet the criteria. The remaining three windows would see losses of above 40% (major adverse). These windows experience very low WPSH values of just 1-2% in the existing baseline, so the small absolute changes are unlikely to be perceptible to occupants.

1116. Overall, the impact to All Hallows-on-the-Wall is considered minor adverse (not significant) in the existing versus proposed scenario.

1117. In the cumulative scenario, for daylight this impact is raised to moderate adverse (significant), with the adverse impacts being caused by 55 Bishopsgate and 1 Undershaft consented schemes. For sunlight, the impact would be minor adverse (not significant) given the full APSH compliance and low existing WPSH figures.

Other cumulative impacts

1118. A number of properties that would achieve BRE compliance in the existing versus proposed scenario, that is that the property is not materially affected by the Proposed Development, would experience daylight and sunlight transgressions in the cumulative scenario.

1119. For daylight, these include:

- 50 Bishopsgate (residential) which would experience a major adverse (significant) impact, primarily attributable to 55 Bishopsgate;
- St Helen's Church, Bishopsgate (place of worship) which would experience a moderate adverse (significant) impact, primarily attributable to neighbouring schemes including 55 Bishopsgate and 1 Undershaft.

1120. For sunlight, of the 8 relevant buildings assessed, five would experience no additional impacts in the cumulative scenario. The remaining three would experience additional impact. Two are discussed above (33 Great St Helen's and St Botolph-without-Bishopsgate), and the third is as follows:

- St Helen's Church, Bishopsgate which is unaffected by the Proposed Development, would experience a major adverse (significant) impact to its available sunlight, attributable to neighbouring consented developments, particularly 1 Undershaft.

Conclusion on Daylight & Sunlight impact

1121. The submitted Daylight and Sunlight chapter of the Environmental Statement shows an overall high level of compliance with the BRE Guidelines 2022 on many of the properties tested. Where there are transgressions, it is noted that the dense urban environment of the City, and in particular the Cluster, is such that properties experience low values in the existing baseline scenarios, and any reasonable increase in massing, done in order to meet the aims of the development plan and priorities for the CAZ on delivery of office floorspace, would appear to disproportionately affect residential properties.

1122. 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 unacceptable impacts overall and is therefore in compliance with Local Plan Policy DM10.7, London Plan Policy D6(d), and Draft City Plan 2040 Policy DE7.

Overshadowing

1123. The BRE guidelines advise that sunlight amenity is measured on 21st March (spring equinox) and the result is expressed as a percentage of the amenity area that receives at least two hours of sunlight on 21st March. The sunlight amenity and transient overshadowing analysis was undertaken in accordance with the guidelines. As explained above, a total of 11 amenity spaces have been tested.

1124. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.

1125. In the baseline, of the eleven amenity areas tested for overshadowing, eight would meet the BRE's criteria of receiving two hours of sun on March 21st on at least 50% of their total area. These are Finsbury Circus, 100 Liverpool Street (terraces 2, 3, 4 and 5), Jubilee Gardens, and Devonshire Square areas A and B. The remaining three areas – 100 Liverpool Street terrace 1, St Botolph's Garden, and Devonshire Square area C do not meet the criteria.

1126. With regards Sun Hours on Ground (SHOG), of the 11 amenity areas tested with the proposed development in situ, 10 would meet the BRE criteria, experiencing less than a 20% alteration.

1127. Finsbury Circus Gardens would see only a negligible reduction in the amount of area which receives at least two hours of sun on March 21st.

1128. There are five roof terraces on 100 Liverpool Street that were tested and would see a nil reduction.

1129. The gardens at St Botolph-without-Bishopsgate receives 2 or more hours of sun on ground on 21st March on less than 1% of its total area due to the existing built-up surroundings. As a result of the proposed development, this falls to 0% of the area of the gardens receiving 2 or more hours of sunlight. Whilst this appears as a 100% reduction, a major adverse impact, in reality the reduction would equate to a short period of time where overall sunlight is reduced. The existing extremely low part of the garden that receives the target 2 hours of sun is also noted, making any alterations appear disproportionately large. Overall, this effect is considered minor adverse (not significant).

1130. Jubilee Gardens would see no reduction in the amount of area that receives at least two hours of sun on March 21st, which is considered negligible (not significant).

1131. Finally, the three areas at Devonshire Square tested would see no reduction to the amount of area that receives at least two hours of sun on March 21st, a negligible (not significant) impact.

1132. Transient overshadowing was also undertaken. At the equinox (21 March/September), shadow would be cast from the proposed development at 8am, moving clockwise. At 9am, Finsbury Circus would become partially overshadowed, which clears by 10am. At 10am, the shadow cast by the proposed development would move to 100 Liverpool Street amenity areas, clearing by 11am. Finally, at 12pm, the proposed development would cast a small shadow on the garden at St Botolph's, which moves throughout the

afternoon. The shadows would not reach Devonshire Square or Jubilee Gardens at the equinox.

1133. At the summer solstice, shadow is cast from the proposed development from 6am, moving clockwise. No amenity areas are affected by the development until 1pm, where a small area of St Botolph's garden would become partially overshadowed, clearing at 4pm. On this day, the shadows would not reach Finsbury Circus, 100 Liverpool Street, Jubilee Gardens, or Devonshire Square.

1134. At the winter solstice, shadow is cast from the proposed development from 9am, moving clockwise. No additional shadows cast from the development would reach any of the 11 tested amenity areas on this day.

1135. In the cumulative scenario, in the transient overshadowing test at the Equinox, there would be an additional impact through additional shadows cast to Jubilee Gardens and Devonshire Square from 10am to 5pm. This occurs only in the cumulative scenario so is not attributable to the Proposed Development.

1136. Further in the cumulative scenario, in the Sun Hours on Ground test, Devonshire Square would see a percentage reduction of 40.7%, 100% and 70.3%, respectively, in the three areas tested, which is considered major adverse (significant). This shadowing only occurs in the cumulative scenario, so is not attributable to the Proposed Development.

1137. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area or surrounding properties 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.

1138. As discussed above, letters of objection have been received from the London Diocesan Fund with regards the overshadowing impact to St Botolph-without-Bishopsgate, All Hallows on-the-Wall, and St Ethelburga's Church, with the latter also drawing a number of other objections on this topic. The letter from the LDF highlights that the proposed development with cumulative surrounds scenario would result in the garden at St Botolph's experiencing a minor adverse impact.

1139. With regards St Botolph's, it is noted that the garden does not meet the BRE criteria for Sun Hours on Ground in the baseline scenario, that is, without the Proposed Development in place. In fact, only 1% of the total area of the gardens would receive 2 or more hours of sun on ground on the 21st March. With the Proposed Development in situ, this drops to 0%. As above it is noted that this appears as a major-adverse impact of 100% percentage reduction,

but in reality, this equates to only a very short period of time when sunlight is reduced to this very small area. Overall, this is not considered significant.

1140. With regards St Ethelburga's, none of the existing open space, the 'Peace Garden', receives more than 2 hours of sun on ground at the equinox, which fails the BRE criteria in the baseline. With the proposed development in situ this would remain at 0%. Therefore, there would be no impact.

Solar Glare

1141. Glare is the discomfort or impairment of vision caused by excessive or large contrasts 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 luminance source within a low luminance scene which impairs vision).

1142. For discomfort glare, the key issue is the total duration of time for which the sun can be reflected to the sensitive location. Durations 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.

1143. The assessment assumes a day with no cloud cover and so the maximum potential sunlight is assessed. No change in climate will alter the effect of the analysis.

1144. 29 road locations have been identified in the ES as sensitive to solar glare within just over 500m of the site. 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 locations are as follows (receptor number):

- Bishopsgate (N1, N2, N3, N4, N5)
- Old Broad Street (N6, N7, N8, N9)
- Bevis Marks (NE1, NE2, NE3, NE4)
- Finsbury Circus (NW1, NW2)
- Blomfield Street (NW3, NW4)
- Bishopsgate (S1, S2)
- Gracechurch Street (S3, S4, S5, S6)
- Old Broad Street (SW1, SW2)
- London Wall (W1, W2, W3, W4).

1145. The technical assessment considers the potential occurrence, proximity, and duration of solar reflections from the facades of the proposed development to 21 of the 29 viewpoints. The proposed development would not be visible from the following viewpoints and therefore no technical assessment was necessary:
- N5, N6, N7
- NW4
- NE4
- S5, S6
- SW1.

1146. At the following 14 viewpoints, the instances of reflection would occur on very small areas of glazing and occur beyond 30-degrees of a road user's line of vision, meaning the glare would occur only for very short periods of time and in th peripheries of user's vision, which is considered a negligible impact and the effect is not significant:
- N2, N3, N8
- NE1, NE2, NE3
- NW1, NW2, NW3
- S1, S2, S3, S4
- W1.

1147. At location N4, looking south from the northernmost viewpoint on Bishopsgate where the proposed development is visible, there is the potential for solar glare within 20-degrees to 30-degrees of a driver's line of sight for a short period of time. This would be approximately one hour between 8 and 9am on a portion of the uppermost northeastern façade between March to May and July to September. This is considered a minor adverse impact and the effect would not be significant.

1148. At the remaining 6 locations, two viewpoints have been identified in each location – one looking straight to a traffic light, or forward.

1149. At viewpoint N1, the southerly most point on Bishopsgate looking south towards the proposed development, there is the potential for solar glare between the hours 8am and 9am when looking straight at the traffic light at the junction. This glare would occur only from the lower floors of the northeastern corner of the proposed tower from march to September. However, when looking forward from this location, any potential glare would occur outside of 30-degres of the driver's line of sight. When looking at the traffic light, any potential glare would occur above the visor line, which would shield the potential effects on sight when deployed.

1150. At viewpoint N9, the southerly most point on Old Broad Street looking south towards the proposed development, there is the potential for solar glare within 10-degrees to 30-degrees of the driver's line of sight when looking at the traffic light. This would occur on the upper portion of the northern façade of the Pavilion Building, from 3pm-5pm from March to May, and July to September.

1151. When looking at the junction as opposed to the traffic light at viewpoint N9, there is the potential for solar glare mostly outside 20-degres of the driver's line of sight between March-April and August to September. Similarly to viewpoint N1, when looking at the traffic light, potential glare would occur mostly above the visor line.

1152. At viewpoint SW2, the southerly most viewpoint on Old Broad Street looking north towards the proposed development, there is the potential for solar glare to occur within 15-degrees to 30-degrees of the driver's line of sight between 5pm-6pm from the southwestern elevation from April to August. There are also isolated occurrences of potential solar glare at this viewpoint from the south façade from 5pm-6pm, but this would be broken up by more solid elements of the building.

1153. At viewpoints W2, W3 and W4, located along London Wall to the west of the Site looking east, there is the potential for solar glare visible within 10-degrees to 30-degrees of the driver's line of sight, both when looking at the traffic light or forward on the road. This would occur on the portion of the western façade of the Tower, mostly between 1pm and 3pm January to April, and August to January.

1154. However, this potential glare would be broken up by more solid elements of the building which would mitigate the full sun disk being visible.

1155. On a small portion of the west elevation of the main core, there is the potential for solar glare to occur between 4pm and 5pm from March to May and August to October within 10-degres to 30-degrees of the driver's line of sight. However, when looking forward at the junction rather than at the traffic light, this potential glare would occur outside of 20-degres of the driver's line of sight, between March and May and August and October. When looking at the traffic light, the potential glare occurs mostly above the visor line.

1156. Whilst there is the potential for solar glare impacts at these 6 locations, overall, the effects are considered minor adverse and the effect would not be significant.

<u>Solar Glare Conclusion</u>

1157. Overall, the potential impact of solar glare from the proposed development on nearby road and rail receptors is considered negligible-minor adverse and the effects are not considered significant.

1158. It should be noted that the assessment for solar glare assumes the worst-case scenario, that the sun will shine every day during daylight hours. Climate data indicates that this is not the case in the UK generally.

1159. None of the anticipated instances of solar glare would occur within the central field of view, and in any case, mitigating measures can and would be put in place.

1160. The final materials and design would act to reduce both the incidence of solar glare and the light pollution by restricting the passage of light or reflected light from the façade of the proposal to sensitive receptors. The potential glare from the proposed new buildings could be tempered through the use of non-reflective glass coatings or fritting. It is also considered that the cladding on the pavilion building would act to minimise any potential instances of glare to westerly viewpoints, breaking up the sheer glazed façade behind and therefore the glare would not be continuous. The design of the buildings has been optimised and glazing would be broken up by less reflective parts of the buildings, so the proposals do not generate solar glare effects that pose danger to users of the transport network.

1161. Further details of the external materials would be provided by condition in order to ensure safe and comfortable levels of solar glare and solar convergence.

1162. The external lighting scheme has also been designed to minimise light spill beyond the paths and roads around the proposed development and to preserve darker spaces adjacent to the site including for nearby residential receptors. Final details of the proposed solar glare mitigation measures are secured through detailed design conditions and S106 obligations.

1163. Overall, subject to the mitigation measures identified it is considered that the effects on solar glare would be acceptable.

1164. If planning permission were to be granted, an obligation within the s106 Agreement would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft 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 Spill

1165. Light spillage is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from commercial buildings onto residential accommodation, where this would cause nuisance to the occupants. It is measured through light intrusion assessments – this is the spilling light beyond the boundary of a proposed development, and it is assessed through vertical illuminance in lux, measured flat at the centre of the sensitive receptor.

1166. Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. Draft policy HS3 (Residential Environment) states that light spill from development that could affect residential areas should be minimised in line with policy DE8.

1167. The Site and its surroundings are defined as a high distinct brightness, which the Institute of Lighting Practitioners (ILP) Guidance Notes classify as Environmental Zone 4 (E4). Within E4, the recommended limit of light spillage is 25-lux pre-curfew (11pm) and 5-lux post-curfew.

1168. The potential light spillage impacts arising from the Proposed Development upon the surrounding existing residential and religious receptors has been assessed. The following properties have been identified as light spill receptors of moderate-high sensitivity:

- 10, 25, 26 Wormwood Street
- All Hallows on the Wall
- St Botolph Bishopsgate
- St Ethelburga's Centre for Reconciliation and Peace
- 48-50 Bishopsgate
- 33 Great St Helen's
- St Helen's Church Bishopsgate

1169. At all receptors identified and assessed for light spill pre-curfew, the levels of light trespass would be limited and would be well below the 25-lux threshold set out within the ILP Guidance and the CoL Lighting SPD.

1170. The technical assessment shows that post-curfew (after 11pm), the levels of light trespass would be below the 5-lux threshold set out within the ILP guidance for the majority of the buildings assessed and concludes a negligible impact and no significant effects.

1171. At the remaining residential receptors, 10, 25 and 26 Wormwood Street, some windows would see transgressions beyond the 5-lux post-curfew threshold.

However, the assessment considered a worst-case scenario whereby the proposed buildings are fully lit at nighttime (around 500-lux luminance). In reality, this is extremely unlikely as the assessment has not taken into account mitigation measures, such as the required Lighting Strategy, secured by condition.

1172. The post-curfew breaches identified at 10, 25 and 26 Wormwood Street would result in a major adverse impact where the effect is significant. However, subject to condition and appropriate mitigation measures, the lighting strategy as submitted with the application suggests that the breaches would be mitigated and the impact would therefore be negligible and the effect not significant.

1173. A condition has been recommended which requires a detailed lighting strategy to be submitted for approval 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.

1174. Subject to the relevant lighting condition, the development would comply with the Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3, and has been designed as to avoid light spill.

Thermal Comfort Assessment

1175. London Plan Policy D8 and D9 and the emerging City Plan 2040 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood - must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

1176. In accordance with the City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

1177. 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.

KEY	USAGE CATEGORY	% OF HOURS WITH ACCEPTABLE UTCI	DESCRIPTION
	All Season	>90% in each season	Appropriate for use year-round (e.g. parks).
	Seasonal	>90% spring-autumn AND >70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
	Short-term	>50% all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.
	Short-term seasonal	>50% spring-autumn AND >25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
	Transient	<25% winter <50% any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

1178. Six configurations have been assessed, including; the existing site with existing surrounding buildings (baseline), the proposed development with existing surrounding buildings, the existing site with Tier 1 cumulative schemes (future baseline), the proposed development with Tier 1 cumulative schemes, the proposed development with Tier 2 cumulative schemes, and the proposed development with Tier 3 cumulative schemes.

<u>Baseline and Future Baseline - Ground Level</u>

1179. In the baseline, the lowest comfort levels are experienced to the south of the Site, to Bishopsgate and Great St Helen's, and to the northeast of the site at Camomile Street, which is to be expected considering the existing wind microclimate in these locations. These are short-term seasonal.

1180. The existing conditions at ground level entrances are largely suitable for all-season, seasonal, or short-term use.

1181. Similarly, conditions at nearby bus stops as existing are suitable for seasonal or short-term uses, which are suitable for their intended uses.

1182. Amenity spaces at ground level around the site, including benches, café style seating, and mixed amenity, are typically suitable for their targets for their intended uses.

1183. However, there is an area of seating outside 64 Bishopsgate that would experience only short-term comfort where the target is seasonal. This is to be expected given the existing wind microclimate in this location causing wind chill. There are also some areas that fall short of the target condition by one category in the baseline, again linked to existing windy areas, notably to the base of Tower 42, St Botolph's Church, One Bishopsgate Plaza, and 100 Bishopsgate.

1184. At terrace level on neighbouring properties in the baseline, including those at 55 Bishopsgate, 64 Bishopsgate, and 33 Old Broad Street, all conditions are suitable for their uses in the baseline.

1185. In the future baseline, that is the inclusion of the tier 1 cumulative schemes to the existing surrounds (without the proposed development), they would make conditions less comfortable to off-site areas, with substantial areas of short-term seasonal conditions experienced to Wormwood Street, Old Broad Street, and within 55 Bishopsgate and 55 Old Broad Street developments.

1186. In particular, the north-west entrance to 22 Bishopsgate becomes suitable only for short-term seasonal use; the bus stop to the northern pavement of Wormwood Street would also only be suitable for short-term seasonal use. Local amenity areas including seating, particularly that to Tower 42, 64 Bishopsgate, 100 Bishopsgate, and St Botolph's Churchyard, would also not meet the target condition. This is consistent with the windy conditions in these areas also experienced in the existing baseline.

1187. Off-site terraces would satisfy the target conditions in this scenario.

Proposed development (with existing surrounds)

1188. In the proposed with existing surrounds scenario, the overall results are very similar to the baseline. The only difference here is that the proposed development would introduce marginally less comfortable conditions, with increased areas suitable for short-term seasonal use) in Wormwood Street and Bishopsgate directly east of the site.

1189. Surrounding entrances and bus stops would achieve suitable thermal comfort conditions for their uses in this scenario. Outdoor amenity areas including seating would be consistent with the baseline.

1190. With regards on-site terraces in this scenario, conditions are generally suitable for short-term use, with some small regions suitable for seasonal or short-term seasonal use, which is one category less comfortable than suitable. However, these terraces would primarily be used in the summer months, where each terrace on the proposed building would achieve comfortable conditions for 96.7% of the season, which is suitable for the intended uses.

1191. For neighbouring off-site terraces in this scenario, all would meet the target criteria for their uses.

Proposed development (with tier 1 cumulative surrounds)

1192. With the proposed development inserted into the future baseline (tier 1), the conditions would be consistent with those results. The inclusion of the proposed development would, however, have a beneficial impact on conditions on Camomile Street, consistent with the beneficial impact the proposed development would have on wind in this location. However, there would be instances of the proposed development making conditions marginally less comfortably within the 55 Bishopsgate and 55 Old Broad Street developments.

1193. All on site entrances would meet the target conditions. The conditions for all off-site entrances is consistent with the future baseline.

1194. In this scenario, there is one entrance (to 65 Old Broad Street) which would not meet the target condition, with only short-term seasonal use. However, when the tier 3 schemes are introduces, this entrance would then satisfy the target.

1195. All off-site bus stops are either suitable for their intended comfort levels or consistent with the future baseline.

1196. To ground level amenity areas off-site, all receptors would either be consistent with the future baseline or would achieve their target categories. However, in this scenario, there are a number of instances where the proposed development would improve conditions over the existing or future baselines, particularly those at St Botolph's Church and Tower 42, which would have a minor beneficial impact.

1197. For terraces in this scenario, all on-site terraces would be suitable for their intended uses, and all off-site terraces would also satisfy the target conditions.

Proposed development (with tier 2 cumulative surrounds)

1198. Other than a slight improvement to conditions on Camomile Street and a slight worsening to conditions on Bishopsgate directly east of the site, this scenario is consistent with configuration 4 (proposed development with tier 1 cumulative surrounds).

Proposed development (with tier 3 cumulative surrounds)

1199. The overall results for this scenario are consistent with configuration 4 (tier 1 surrounds), with a slight worsening along Old Broad Street, although this area would still remain suitable for its intended uses. The entrance to 65 Old Broad Street that would not meet the target conditions in the tier 1 assessment would meet the target conditions when the tier 3 schemes are in place.

Thermal Comfort Conclusion

1200. The application has suitably and sufficiently assessed the thermal comfort impact of the proposed development, in line with the City of London guidance.

1201. When compared to the baseline (existing surrounds), the proposal would not have a material impact on thermal comfort conditions for any existing off-site receptors including entrances, bus stops, seating and benches, ground level mixed amenity and roof terraces.

1202. New receptors within the proposed development (including entrances and roof terraces) would all experience suitable thermal comfort conditions.

1203. There are elements in the future baseline condition where conditions are improved when the development is tested against tier 1 cumulative schemes, such as the off-site benches by Tower 42 and St Botolph's Gardens – all suitable for their intended uses.

1204. When tested against the Tier 1 cumulative schemes, the proposed development would improve some conditions over the baseline, changing from unsuitable in the future baseline scenario and instead becoming suitable.

1205. There would be a temporary seasonal impact on the suitability of conditions as a result of the proposed development in the cumulative scenario within the 55 Old Broad Street redevelopment, but once the Tier 3 schemes are introduced, this would become suitable.

1206. The Tier 2 cumulative schemes would not materially alter conditions over and above the Tier 1 cumulative schemes. The tier 2 schemes single out 55 Bishopsgate and 55 Old Broad Street, separate from the rest of the tier 1 schemes, and show that all other tier 1 schemes would have a negligible impact on conditions around the site. Similarly, the impact of the tier 3 schemes would be similar to that of the tier 1 schemes.

1207. Overall, the impact of the proposed development on local thermal comfort conditions on and off site is consistent with that of the future baseline, with only marginal alterations to results as a result.

1208. It is considered that the thermal comfort in and around the site would be acceptable and in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Noise and Vibration

1209. Noise and vibration from the development is a concern for those raising objection to the scheme, particularly the impact to St Ethelburga's Centre for Reconciliation and Peace.

1210. The development plan sets out a series of noise policies that need to be taken into consideration in the assessment of each case. This includes policy DM15.7 of the Local Plan, which relates to noise and light pollution. A summary of the main noise related points from policy DM15.7 are set out below:

- Developers will be required to consider the impact of their development 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 and quite open spaces;
- Any potential noise conflict between existing activities and new development should be minimised;
- 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; and
- Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

1211. Policy DM21.3 of the Local Plan further seeks to protect the amenity of existing residents by resisting uses that would cause undue noise disturbance and

seeks to ensure that noise generating uses are sited away from residential uses where possible.

1212. Policy DM3.5 of the Local Plan states that proposals for new night time entertainment related uses 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 and environmental amenity, taking account of the potential noise, disturbance and odours arising for the operation of the premises, customers arriving at and leaving and the servicing of the premises. Applicants would be required to submit Management Statements detailing how these issues would be addressed during the operation of the premises.

1213. The draft City Plan 2040 has policies relating to the prevention of noise pollution (policy HL3) and preventing noise disturbance from terraces and viewing galleries (policy DE4). Policy SA2 of the Plan sets out a requirement for major commercial development to provide a management plan setting out proposals for the dispersal of patrons and workers from premises to reduce instances of noise nuisance.

1214. Policies D13 and D14 of the London Plan 2021 further seek to ensure that harmful noise impacts are mitigated.

1215. The City of London Noise Strategy identifies the strategic approach to noise in the City in line with the Noise Policy Statement for England, and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise impacts of development.

1216. Chapter 7 of the Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic which could be attributed to the development, and the likely significant environmental effects of these matters.

1217. In most City redevelopment schemes, the main noise and vibration issues occur during demolition and early construction phases. The Assessment identifies a Major Adverse (significant) impact to 10, 25 and 26 Wormwood Street from basement construction and noise from superstructure works, and a Moderate Adverse (significant) impact from vibration from piling.

1218. Nine other receptors (eight commercial and one place of worship at St Ethelburga's) would experience moderate adverse (significant) noise from demolition, basement construction, and superstructure works.

1219. 48-50 Bishopsgate would experience a minor adverse (not significant) effect during demolition works. Minor adverse (not significant) effects would be experienced at 8no. surrounding receptors due to vibration from piling.

1220. All other receptors would experience a negligible impact, the effect of which is not significant given the temporary nature.

1221. The ES acknowledges that the presented noise levels are a worst-case scenario, without any mitigation measures being applied. In practice, the development would be required to comply with the City's Code of Practice for Deconstruction and Construction Sites (9th Edition, January 2019), which sets out standards for how construction sites are to be maintained and operated with a view to limiting disturbance and disruption to neighbours and users of the surrounding area. A scheme of protective works for the development would be required by condition prior to any works commencing, setting out how noise, dust, and environmental effects of the works would be minimised.

1222. The statement has identified that there would be no significant effects during the operational stage of the development, either from road traffic noise associated with the development itself, or operational noise from the development, including from entertainment noise emission from the use of internal and external spaces in the proposed development, due to the design of the development including optimised layouts and suitable insulation from materials.

1223. In respect of vibration, the potential significance of construction vibration associated with the piling phase of the proposed development has been assessed. The ES concludes that construction vibration could have an effect on 10, 25, and 26 Wormwood Street given their proximity to construction activity. As above, a number of objections have been received relating to the impact of vibration on St Ethelburga's Centre for Reconciliation and Peace. The impact of the vibration on this property has been assessed as negligible (not significant). In any case, vibration would be controlled as far as practicable through the scheme of protective works which would be required by condition, and a condition is also recommended requiring the applicant to submit a detailed construction method statement which includes details to show the methods of structural monitoring and preservation of historic building features and fabric to St. Ethelburga's.

1224. Information is not yet available regarding the type, number or exact location of the mechanical plant which could be installed in the completed development. Such information would be expected at detailed design stage. As a result, should planning permission be granted details of the type

of plant, location of the plant, noise levels from the plant and details of plant mounting would be required by condition. The plant would need to comply with the City's standard of 10dba below background noise level. As such it is not considered that operational plant noise would give rise to any adverse or significant adverse effects.

1225. The ES considers the effects of noise from delivery and servicing activities associated with the operation of the proposed development. The service yard for the new buildings is in the same location as existing, in an underground basement which is an enclosed space. Access to the yard would be via a ramp accessed from Old Broad Street, located away from the majority of the sensitive receptors. Subject to a Delivery and Servicing Plan (DSP) to be secured through S106, it is anticipated that there would be no significant noise from delivering and servicing activities at the sensitive receptors due to the screening from built structure and separation distances. As such negligible impacts are expected from delivery and servicing noise and no significant effects are anticipated.

1226. Technical consideration has been given to potential noise from the proposed entertainment/cultural spaces and any use of amplified music. The potential impact from the Pavilion building has been assessed, but it is important to acknowledge that the assessment has been prepared in the absence of having operators and tenants for such spaces, and therefore it is not known how they would operate in practice. Reference is made to the licensing regime as a means to place conditions on the operators when such information is known, to minimise impacts on surrounding sensitive uses. It is recommended that an Events Noise Management Plan be prepared for internal events greater than 50 people.

1227. The following conditions are recommended by the City's Environmental Health team to prevent undue operational noise from the site, noting that the Licensing Act 2003 should not be relied on to control noise:

- Ensure that no live or recorded music is played from the Site that is audible within any residential or other premises in nearby relevant buildings, which includes use of the external terrace areas;
- That the Class E/Sui Generis premises/uses shall not be open to customers between the hours of 11 pm on one day and 7 am the following day;
- That the office roof terraces are not used or accessed between the hours of 11pm on one day until 7am the following day and at no time on Saturdays, Sundays or Bank Holidays other than in the case of an emergency; and
- That there be no promoted events on the terraces of the Tower.

1228. Policy 3.5 of the Local Plan and policy CV4 of the Draft City Plan 2040 refer to the provision of management plans for evening and nighttime uses. A clause within the S106 agreement would require a management plan is provided for the proposed City Market and Pavilion cultural uses, setting out information such as:

- Hours of operation;
- Noise mitigation plans both internal and external noise, including measures to reduce sound transfer, such a soundproofing, noise controls and double entry lobbies;
- The dispersal of patrons;
- Arrangements for the storage, handling and disposal of waste;
- Information on deliveries and servicing; and
- Measures to deal with odours and the location of ducts and plant.

1229. In conclusion, the submitted ES considers the impact of the development on the noise environment. Subject to conditions controlling noise levels from entertainment uses and plant equipment, hours of operation, and S106 clauses regarding the management of the premises, it is not considered that operational noise would adversely affect neighbours. Noise from construction and deconstruction has been identified as potentially having temporary significant effects on sensitive receptors. The developer would be required to mitigate the impact of the works and would need to provide a Scheme of Protective Works to demonstrate compliance with the City of London's Code of Practice for Deconstruction and Construction sites. A condition is recommended to ensure that any new plant would be 10dba below background noise level. Subject to conditions it is considered the proposals would comply with London Plan Policies D13 and D14, Local Plan 2015 Policies DM15.7, DM21.3 and DM3.5 and draft City Plan 2040 policies HL3, SA2 and DE5.

Air Quality

1230. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts, and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

1231. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction, and operational phases of the development. The Air Quality

Positive approach as recommended by policy HL2 of the emerging City Plan 2040 has been undertaken throughout the design of the proposed development in line with the GLA Air Quality Positive Guidance 2023, and an Air Quality Positive Statement has been submitted with the application as an appendix to the main Air Quality chapter of the ES.

1232. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

1233. The development has proposed the installation of four backup diesel generators, with the potential of an additional two to be installed at a later date. The four would be for life-safety emergency operation for the Tower, and the further two would be operated by the future tenant of the Pavilion Building. All generators should be fitted with mitigation, such as SCR, to reduce NOx emissions to comply with the City of London Air Quality SPD, and only tested in-line with manufacture guidance. Alternatives for backup generators have been assessed, and in the event future generators are installed this process would need to be repeated. If any future generators are utilised for a level of business continuity, they should be included in a Air Quality Neutral Assessment.

1234. The proposed development would be car free save for the disabled parking bay, and the energy strategy is all-electric, with heating provided through air source heat pumps which is welcomed. No combustion plant is proposed for the primary energy strategy, but there are emergency generators proposed for life safety purposes. The BREEAM Pre-assessment demonstrates that the scheme would achieve 'Outstanding' in the pollution category. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. There are substantial impacts upon NO_2 concentrations predicted during the construction phase, but not during the operational phase.

1235. Measures that were considered during the design phase to have a positive impact on air quality include separating sensitive uses from pollution hotspots and a robust ventilation strategy, use of green infrastructure, minimising traffic generated, and utilising a low or zero emission energy strategy. The development is also targeting WELL credits for indoor air quality which would have positive health and wellbeing benefits for building occupants.

1236. The City's Air Quality Officer has no objections following some clarifications on the ES Chapter. Conditions are recommended in relation to Non- Road Mobile

Machinery Register details, details of ventilation and extraction equipment specifically in relation to the City Market, and the requirement for a Local NO2 Monitoring Strategy as part of the Construction Environmental Management Plan.

1237. Subject to conditions, the proposed development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy SI of London Plan which all seek to improve air quality.

Contaminated Land

1238. Local Plan policy DM15.8 and draft policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

1239. Policy S1 of the emerging Draft City Plan expects developers to address land contamination. The application is accompanied by a Phase 1 Land Contamination Desk Study Report, prepared by RMA Environmental and contained within Volume 3 of the Environmental Statement by Trium.

1240. There are five available borehole records on the Site, none of which have reported any past land contamination in those areas. The unexploded bomb risk maps confirmed the Site is located in an area of high risk of Unexploded Ordnance (UXO). The Site is not currently classified as contaminated land under Part 2A of the Environmental Protection Act 1990, nor has it been identified for further review under the CoL's Contaminated Land Strategy. There are no records of current or former landfills on Site. The assessment has considered the effect of made ground across the City.

1241. The applicant has identified that the site has a long history of occupation, including for commercial purposes since 1872. The current building, including significant basement excavation dates from the 1970s (as refurbished following bomb damage in 1996). The main potential contaminant has been identified as asbestos. There are a number of small scale potentially contaminative uses within a 250m radius of the Site, but none within the Site boundary.

1242. The report confirms that there is no risk to future site users from potential contamination within soils and groundwater. During construction, there is moderate risk for construction workers from potential soil and groundwater

contamination, but that can be sufficiently mitigated against through safe working practices.

1243. A condition is recommended that requires a Preliminary Risk Assessment to be completed prior to commencement of development to identify potential for contamination, and if this finds the potential for contamination, that intrusive investigations are required to provide information to support a suitable remediation strategy and mitigation measures, with investigations required to confirm both geotechnical and geoenvironmental ground conditions. As part of any future investigation the work should also include groundwater and gas monitoring, and screening of samples for the presence of asbestos.

1244. Overall, subject to condition the proposals are in accordance with policy DM15.8 of the Local Plan and policies S1 and HL4 of the emerging City Plan.

Health Impact Assessment

1245. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

1246. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HIA sets out an overall positive impact on health arising from the proposed development and advises on the benefit of adopting strategies that would ensure health impacts are positive, such as a Construction Environmental Management Plan and Cycling Promotion Plan.

1247. There are a number of residential properties surrounding the development site. The HIA addresses potential disturbance from construction noise for the neighbouring sensitive receptors and states that the Construction Environmental Management Plan and Demolition and Construction Logistics Plans would enable mitigation of disturbance.

1248. The HIA has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Promoting walking through clear and comfortable pedestrian routes and an enhanced public realm, and suitable inclusively accessible routes;
- Excellent cycle facilities which would encourage and support active transport by building users;

- Focus on pedestrian and cyclist safety through clear signage and wayfinding, active and passive surveillance across the Site, and a robust lighting strategy to allow for an enhanced feeling of security;
- The Site is well located with good links to a wider pedestrian, cycle and public transport network, promoting users to choose active modes of travel coming to and from the Proposed Development;
- The provision of high-quality public realm at grade would improve the physical environment and contribute to social cohesion, including integrated seating and green infrastructure that would encourage people to linger and promote an improved sense of wellbeing;
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
- Provision of significant greened areas and external terraces for future commercial occupiers to promote access to nature and a sense of wellbeing;
- Incorporation of public toilets in the City Market and a public drinking fountain in the Cycle Hub;
- Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site;
- A car-free (except the disabled bay) development minimising vehicles travelling to the Site, encouraging active travel, and reducing emissions;
- Building design that has considered the context of the Site and site layout optimised through the co-location of office, retail and community uses with enhanced public realm;
- Pavilion Building purpose built for community use, to promote social interaction through special events and programming, whilst the City Market encourages drop-ins, both promoting social cohesion;
- The proposed buildings would employ systems to reduce energy usage, and the Proposed Development targets a BREEAM Outstanding rating; and
- Consideration to sustainability and inclusive design.

1249. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:
    - Preparation and agreement of Construction Environmental Management Plan (CEMP)/Scheme of Protective Works to address any adverse amenity impacts arising from demolition and construction; and
    - Provision of affordable creative workspace within the Pavilion Building which would be made available to a range of potential occupiers, including local businesses – to be agreed through S106 obligation.

1250. Potential temporary negative impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations contained within the S106 Agreement. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and

the proposals would comply with London Plan policy GG3 and draft City Plan 2040 policy S1.

Overall impact on residential amenity

1251. Local Plan policy DM21.3 and draft City Plan 2040 policy HS3 seeks to protect the amenity of existing residents by resisting uses that would have an undue impact on amenity through noise disturbance, fumes and smells and vehicular and pedestrian movements likely to cause disturbance. Proposals should be designed to avoid overlooking and protect privacy, daylight and sunlighting levels to adjacent residential accommodation. This section of the report draws together an assessment of the impacts of the scheme on residential amenity.

1252. A detailed assessment of the impact of the scheme in terms of noise and disturbance is set out in the Noise and Vibration section of this report. The Environmental Statement identifies that noise from the piling and building phase could have a temporary significant effect on nearby residents as sensitive receptors. To minimise the impact of noise and disturbance on residents, conditions and S106 obligations are recommended to cover:

- Noise levels from operational plant;
- A Scheme of Protective Works to manage noise from the construction and demolition phases of development;
- A Delivery and Servicing Management Plan to manage noise from vehicular traffic using the loading bay;
- An Events Management Plan to limit the impact of any internal/external events;
- Control of noise levels from entertainment uses and on-site terraces; and
- Hours of operation of the entertainment and retail/f&b spaces.

1253. The scheme has been assessed with regard to daylight, sunlight, overshadowing, solar glare and light spillage as is set out in the relevant section of this report. There would be some adverse impacts on daylight to residential properties at 10, 25 and 26 Wormwood Street. This is due to the existing low levels of light experienced by these properties, that would appear disproportionately worsened with any reasonable increase in massing on the proposed development Site, which is to be expected from the dense urban environment of which the Site is located. It is otherwise considered that a good a good level of daylight and sunlight would continue to be experienced by other surrounding properties, which is consistent with the baseline and future baseline scenarios. Subject to further details in respect of the design of the building facades and a lighting strategy being secured by condition, it is not considered that the proposal would have any undue impact in respect of solar glare or light spillage. Proposed mitigation measures for potential light spillage, including designing the interior lighting in line with the requirements

of the City Environmental Zones as outlined in the Lighting SPD, would be secured through the condition.

1254. The proposed Tower features a number of quadruple height terraces on its western promontory, which would have some views towards and over residential properties to the north. Subject to conditions on details of a landscaping strategy to each terrace to minimise users being able to access the very edge, given that the terraces are mostly at a high level in the Tower that would look out above the roofs of the residential properties to the north, it is not considered that the potential for overlooking from the terraces to the residential properties would be to a harmful level. The residential properties nearby are already significantly overlooked in the existing situation.

1255. Subject to conditions it is considered that the proposal would comply with residential amenity related polices: Local Plan policies DM10.3, DM15.7 and DM21.3, and emerging City Plan 2040 policies HL3, HS3, DE4(b), DE7, and DE8.

Sustainability

Circular Economy

1256. London Plan policy SI7 (‘Reducing waste and supporting the circular economy’) sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 set out the City’s support for circular economy principles. Emerging City Plan 2040 Policy S16 sets out the City’s support for Circular Economy principles.

1257. In particular, policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites.

1258. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 strategic policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options.

1259. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

Existing building

1260. The site is currently occupied by a 28-storey building with a single basement level, and has a five-storey podium. The building is 121.5m (AOD) high and includes office accommodation totalling 54,344sq.m (GIA).

1261. The original building on site was constructed in 1976. In 1993 the building was extensively damaged by a truck bomb. In 1995 the building was fully refurbished introducing much larger, open plan floor plates. The buildings original core and steelwork remain but the façade was fully replaced. The new façade was bonded to the structure to prevent major damage in case a similar event was to occur again. This would mean an extremely complex, long and expensive process to demount the façade without damage.

1262. Down stand beams make façade demounting and floor plate extension challenging.

1263. The existing superstructure is made of a structural steel frame, precast concrete slabs, and a concrete core. Most of the weight sits in the concrete part of the structure. The structural steel has the potential to be reused, though it is important to note that uneven openings in the steel beams would make it less desirable on the re-used steel market for direct reuse. The pre-cast slabs have a screed topping which would make deconstruction difficult, and today there are limited options for reuse of concrete planks in that quantity.

1264. An estimated 48% of the total mass of the existing building is found in the substructure (28% in the 2.5m thick raft foundation, 15% in the piles and 4% in the retaining walls). As such, it is a key design priority to retain as much as possible.

1265. The typical existing floor-to-floor height is 3.49m whilst the clear height (floor-to-underside of structural beams) is 2.55m. The applicant cites that the low clear height would limit the quality of space and energy performance achievable, and reduce commercial viability as the development would not be competitive with best-in-class office space. According to the applicant, it would not be possible to install underfloor air systems on existing floorplates which are better for occupant wellbeing, whilst changes required to the servicing strategy would lead to complexity of installation and poor aesthetic appeal of exposed services.

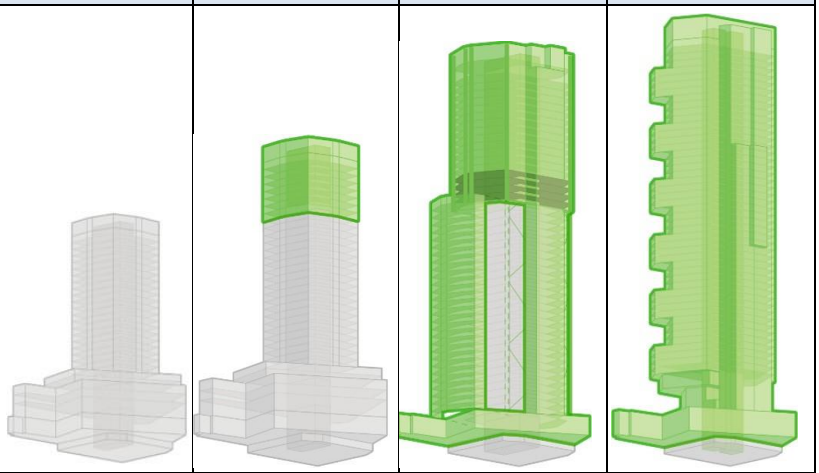
1266. The application includes a pre-redevelopment assessment exploring opportunities for differing levels of refurbishment and retention in line with the City Carbon Options Guidance. Compliance was confirmed by third party review by Heyne Tillett Steel. Four options were assessed initially but Option 1 was excluded from the final round of evaluation, as it was not considered a feasible option by the applicant team due to shortcomings in performance and quality.

Option 1: Light refurbishment – No major structural intervention. Full replacement of MEP systems only. Would not meet current building regulations.

Option 2: Minor refurbishment with limited extension (7 additional storeys) - The maximum extension the existing structure can support. Full replacement of the façade, internal finishes, lighting and MEP services, plus additional elevators to meet regulations.

Option 3: Lateral extension & 20-storey extension - Maximum structurally viable vertical extension above existing building, plus maximum lateral extension of existing floor plates. Significant demolition of existing substructure to support overbuild.

Option 4: Redevelopment - Retention of existing basement raft slab, piles and retaining wall. Demolition of superstructure and podium and creation of a new, best in-class sustainable tower.

	Option 1	Option 2	Option 3	Option 4
				
Gross Internal Area (GIA) m^2	42,522	51,188	101,896	135,355
Substructure % retained by mass	100	100	80	100
Superstructure (Frame, Upper floors, roof, stairs, ramps) % retained by mass	100	94	60	0
Facade (External walls, windows, doors) % retained by area	100	0	0	0
Estimated / target Energy Use Intensity (EUI) kWh/m^2	180	98	90	70
	CARBON INTENSITY (emissions per m^2)			
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *excl. sequestration*	243	411	893	756
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	615	783	1,265	1,128
Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	316	211	158	123
Total WLC Intensity (inc.B6 & pre-demolition) ($kgCO_2e/m^2$ GIA)	931	997	1,430	1,264
	ABSOLUTE CARBON EMISSIONS			
Upfront Embodied carbon (A1-A5) (tCO_2e)	10,333	21,038	90,993	102,328
Operational Carbon for building lifetime (B6) (tCO_2e)	13,438	10,785	16,101	16,635
Total WLC (incl. B6 and pre-demolition) (tCO_2e)	39,589	51,018	145,713	171,075

1267. **Option 1** offers maximum retention but with no upgrade of the façade, roof or cores, this option would not offer sufficient operational improvement or climate resilience to be considered a long-term solution.

1268. **Option 2** achieves a high level of retention and significantly improved operational performance resulting from full MEP and facade replacement. It extends the building's lifespan and resilience but falls short of new-build standards including reduced floor to ceiling heights and daylighting, inferior indoor air quality and lack of upper-level external amenity space. Ground level urban greening and public realm improvements, in addition to the office space quality, are more limited than other options. While its carbon emissions are substantially lower than (around a third of) Options 3 and 4, leasing and densification opportunities to meet the City's future office demand do not meet the site's potential.

1269. **Option 3** achieves a medium-high retention level and offers a large increase in floor area in addition to a significant improvement in performance. Retention in this scenario comes at a high cost in terms of construction costs and in carbon emissions due to the complexity of building over the existing structure. The new space would meet Grade A office standards, and provide added sustainability benefits like urban greening and improved rainwater management. Lower floor levels, however, have constraints on thermal comfort, daylight, and quality of space due to existing floor heights, while public realm opportunities are severely limited due to the building's large footprint.

1270. **Option 4**, through careful structural design, is able to retain 48% of the existing building mass (substructure only), whilst providing 54 storeys of best-in-class office space with excellent thermal comfort, daylighting, and adaptability/flexibility. The new build structure can capitalise on material/structural optimization while offering extensive greening and public realm improvements not possible in the other options. Option 4 maximizes site density and future-proofs the building for market demands, operational performance, and climate resilience, albeit at a carbon premium.

1271. In terms of carbon emissions, **Option 2** is the lowest, with a significantly reduced upfront and whole life carbon footprint due to extensive retention. **Option 3** results in the highest WLC emissions per sqm due to the challenging build-over structure, although it provides more floor area than Option 2. **Option 4** has the highest carbon impact but offers the greatest floor area and quality, a 33% increase in GIA compared to Option 2 at 3.35 times the lifetime carbon emissions cost.

1272. Whilst **Option 2** remains the most carbon-efficient and cost-effective solution for improving performance and extending use of the site, ultimately**, Option 4** was pursued by the applicants, supported by the overall planning balance, as the best choice for maximizing site potential and quantum of office floorspace, tenant experience, flexibility, and climate resilience. As such, the development

should demonstrate best efforts to minimise carbon and to deliver exceptional performance and wider sustainability benefits.

1273. The explored refurbishment, extension, and new build options are considered to comply with the GLA's Circular Economy Statement guidance, the Local Plan 2015 policies CS15 and DM17.2, the CoL Carbon Options Guidance, and the emerging City Plan 2040 policies S8 and DE1, which require a robust exploration of options as part of redevelopment assessment.

Application proposal:

1274. The proposed development aims to retain 100% of the substructure (foundation raft, piles, retaining wall) which constitutes ~48% of the existing building by mass. This approach has required the development of a highly efficient structure to reduce weight. The entire building above ground and existing basement levels would be demolished. It is important to note that the amount of retention possible is uncertain at application stage due to challenges outlined by the structural engineers below:

- Structural capacity of the existing raft is limited. Invasive investigations required to confirm capacity which will follow in later project stages
- To reuse existing piles, loads must be aligned with them and distributed equally along the load curves.
- Dense arrangement of perimeter columns may preclude alternative load distribution.

1275. Certain aspects of the existing building design outlined in more detail under the Existing Building section above (façade bonded to slab, concrete screed poured on pre-cast planks, irregular openings in steel beams) demonstrate that the existing building has not been designed with adaptability and deconstructability in mind, and are likely to reduce the quantity of material which can be deconstructed and the opportunities for reuse of these elements on or off site.

1276. A pre-demolition audit has been carried out to identify opportunities of recovery, reuse and recycling. The most significant key demolition products by weight are concrete and metal, which constitute 78% and 14% respectively of total estimated waste arisings. Timber, glass, and gypsum make up a total of 5% combined. There is little reuse potential for concrete in current industry practice. The audit provides a list of materials assessed to have reuse potential from the existing building. Approximately 7.9% by weight of the total demolition/deconstruction arisings are considered suitable for onsite reuse. Key reuse opportunities and targets are shown in the table:

Element	Estimated demolition quantity (tonnes)	Quantity proposed for reuse on site (tonnes)	% proposed for reuse
Raised access floor	873	699	80%
Metal ceiling tiles	147	74	50%
Precast concrete slabs	5,774	116	2%
Steel frame	2,658	1,329	50%
Carpet tiles	91	64	70%

1277. For the materials in the table, on site reuse should be prioritised, and excess materials offered to reuse contractors and/or listed on a material exchange platform.

1278. The Circular Economy Statement (CES) submitted with the planning application describes the strategic approach to the incorporation of circularity principles and actions into the proposed development. The strategy includes measures to support reuse and recycling of existing materials within the new built elements as well as durable materials and construction, and sustainable procurement. The strategy meets the requirements of the GLA's Circular Economy Guidance, meeting or exceeding the targets set out therein.

1279. Some of the key measures proposed are:

- Maximum possible retention of the existing substructure (survey dependent);
- Façade predominantly uses a highly repetitive unitised curtain wall system. Modules can be prefabricated off-site, designed for ease of disassembly, maintenance and reuse. Glass is intended to be replaceable from inside the building. Laminated glass has been used only where necessary to aid solar control further maximising reusability/recyclability;
- Steel frame would prioritise bolted connection (where loads allow) to enable future disassembly;
- On floor air handling systems located near lift core allow easy replacement;
- Dry connections (avoiding adhesives) would be prioritised in new partitions and finishes of landlord areas;
- Construction and demolition waste would be minimised through a robust resource management plan;
- Prioritise manufacturers that offer take-back schemes;
- Repeatability of the office floor plates means that services distribution can be coordinated and standardised. This provides excellent opportunities for prefabrication, resulting in more efficient installation, reduced costs and improved quality control; and

- Targeting minimum 20% recycled content by value for new materials in line with the GLA recommended target. At application stage recycled content is tracking at 36% as estimated by the cost consultant.

1280. The new structure has been designed to adapt to different occupancy splits and densities, future uses and climate change by considering:

- Maximised floor-to-floor heights;
- Changes to wind, rainfall, drought, flooding in structural and civil engineering design due to climate change; and
- Thermal loading and expansion and contraction with change in temperature of external structures.

1281. The development area is maximised within the constraints of the site and building heights so there is no opportunity for future addition of massing. As such, the structural design has not been 'over-dimensioned' to allow for uses with significantly higher load capacities. Elements for further exploration during detailed design phase include:

- Prefabrication of major building elements, including the steel frame, façade modules, precast slabs and elements of the MEP services.

Operational Waste

1282. The Proposed Development is committed to achieving a municipal waste recycling target of 70% as a minimum by 2030, exceeding the GLA and City of London current target of 65%.

1283. An update to the detailed Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved is required by conditions.

BREEAM and other certifications

BREEAM

1284. Given the different use types proposed for the development, the building is split into 3 distinct BREEAM assessments. The pre-assessment results as shown in the table below indicate that each area should achieve the target rating comfortably. The development is on track to achieve a high number of credits in the City of London's priority categories of Water, Pollution and Materials, as well as the climate resilience credit in the Waste category. The office area is predicted to achieve a high number of credits in the City's other

priority category, Energy, whilst the retail and cultural areas are predicted to achieve a medium number of Energy credits.

BREEAM Standard	Target Rating	Pre-assessment Score
New Construction 2018 'Office' Shell & Core	Outstanding (≥ 85%)	90.8%
New Construction 2018 'Retail' Shell & Core	Excellent (≥ 70%)	79.3%
New Construction 2018 'Exhibition' Shell & Core	Excellent (≥ 70%)	78.7%

1285. 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.

Other certifications

1286. A WELL building assessment focuses on human health, requiring design and operation to prioritise health and wellbeing. A WELL version 2 Core Building 'Platinum' rating is being pursued; the highest rating available.

Whole Life Cycle Carbon Emissions

1287. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants of development proposals referable to the Mayor to submit a Whole Life-Cycle Carbon assessment (WLCA) and encourages the same for all major development proposals. Emerging City Plan 2040 Policy DE1 requires all major developments to submit a WLCA. The assessment captures a building's operational carbon emissions (regulated and unregulated energy use), as well as embodied carbon emissions, i.e. those associated with raw material extraction, manufacture and transport of building materials, construction, maintenance, repair and replacement as well as dismantling, demolition and eventual material disposal. The Circular Economy Strategy is closely interlinked, addressing reuse and recycling of existing buildings and materials, as well as the longevity, flexibility and adaptability of the design proposal.

1288. Policy DE1: Sustainable Design of emerging City Plan 2040 states that "development proposals should take a retrofit first approach thoroughly exploring the potential for retaining and retrofit existing buildings as the starting point for appraising site options". The policy continues "where new buildings are assessed to be the most sustainable and suitable approach, they should deliver exemplar low carbon development and the highest environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area."

Application Proposal

1289. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The tall building structure and design present particular challenges to the need to reduce whole life-cycle carbon emissions. Key design features to minimise carbon emissions include:

- Retention of 100% of the existing substructure (~48% of existing building mass), retention subject to further invasive surveys;
- Avoiding heavy concrete core;
- Optimised diagonal bracing to create efficient and lightweight structure enabling retention and reuse of existing raft slab;
- New main servicing core located outside of the existing raft foundation also to facilitate retention of raft slab;
- Light weight structural steel sections adopted following assessment of options;
- Steel connections optimised in line with lighter weight structural steel sections;
- High recycled content steel specified (subject to procurement);
- Unitised double glazed (DGU) curtain walling selected instead of closed cavity façade (CCF) following façade embodied carbon analysis;
- High recycled content aluminium for façade components (subject to procurement);
- Electric Arc Furnace (EAF) steel, sourced from Europe and transported via train and vessel (to minimise A4 emissions);
- Exposed or self-finishing materials are selected to minimise the amount of ceiling required; and
- Underfloor air supply system specified is largely ductless which reduces embodied carbon.

1290. Other opportunities have also been identified and quantified which would allow the Proposed Development to reduce its whole life-cycle carbon further. These are subject to feasibility and will be investigated during developed design stage:

- Increase cement replacement with precast concrete slabs from 25% GGBS to 40% GGBS;
- High recycled content and renewable energy electric arc furnace (EAF) steel columns and bracing;
- Glass with high recycled content; and
- High recycled content and renewable energy electric arc furnace (EAF) steel connections.

1291. The table below shows the estimated WLC emissions of the development proposal and the GLA benchmarks for embodied carbon emissions.

Floor Area = 144,140m2 GIA		Carbon Intensity (kgCO2e/m²GIA)		
Stages	Lifecycle Carbon Emissions (tCO2e)	Development proposal carbon intensity (kgCO2e)	GLA standard benchmark*	GLA aspirational benchmark *
Upfront Embodied carbon (A1-A5)	119,295	846	<950	<600
In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7)	63,673	452	<450	<370
In-use Operational carbon (B6-B7)	128,905	915	n/a	n/a
Lifecycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	182,971	1,297	<1400	<970
Whole lifecycle carbon (A-C, incl. B6-B7 inc. sequestration)	311,936	2,212	n/a	n/a

**GLA benchmark figures include FF&E and MEP for CAT-B however the application proposal WLC assessment excludes these elements The application assessment likely underestimates emissions when compared to the GLA benchmark values.*

1292. At application stage, the total WLC emissions of the proposed development over a 60-year period are estimated to be 311,936 tCO_2e (2,212 $kgCO_2e/m^2$ GIA). Upfront embodied carbon emissions (A1-A5) have been estimated at 119,295 tCO_2e (846 $kgCO_2e/m^2$ GIA), accounting for ~38% of the total whole life carbon emissions. Operational emissions are calculated at 128,905 tCO_2e (915 $kgCO_2e/m^2$GIA), equating to ~41% of whole life carbon emissions.

1293. As this assessment is based on the Stage 2 cost model information, there are still considered to be a number of uncertainties in the design that would be developed as the scheme develops.

1294. The proposals include the creation of additional two-level basement area skirting the existing retained substructure as well as new pile foundations, strategically located to support the new buildings as efficiently as possible. New concrete associated with the new basement works and precast slabs in the new superstructure comprises approximately two-thirds of the material mass and 20% of the product stage (A1-A3) embodied carbon emissions of the proposed development. The steel frame accounts for almost 50% of product stage emissions.

1295. A detailed Whole Life-Cycle carbon assessment incorporating improvements that are achieved through the detailed design stage, and a confirmation of the post-construction results are required by conditions.

Operational energy strategy and related emissions

1296. London Plan Policy SI 2 requires major development to be net zero-carbon, with a minimum reduction in regulated emissions (i.e. those associated with heating, cooling, ventilation, hot-water and lighting) of 35% beyond Part L of the Building Regulations. Non-residential developments should target 15% reduction in emissions, through energy efficiency measures alone (Be lean stage).

1297. Site wide, the application proposal has been calculated to achieve a total 16% reduction in regulated carbon emissions compared to a Part L 2021 compliant building, falling short of the London Plan target of 35%.

'Be Lean' (Demand Reduction)

1298. The energy strategy outlines the passive and active measures proposed to reduce energy demand and the risk of overheating. Key passive design measures include:

- The majority of the south façade of the building is shaded by an opaque lift core to control solar gains
- High-performance glazing with low g-values to minimise solar gains. G-values have been tailored according to height and orientation of glazing within the façade.
- 54.3% of façade in the occupied areas is solid (not glazed) due to the presence of external structure, spandrel panels and framing elements
- facades have been designed so that the average peak solar gain always achieves 40-50 W/m2 (or lower)
- Extensively vegetated terraces to the east and west would reduce direct solar gains in the adjacent areas
- Glare control blinds in areas identified by solar analysis
- Low temperature hot water distribution
- Optimised pipe runs and insulation to limit heat loss.

1299. The proposed tower is also shaded by neighbouring tall buildings to the south and east.

1300. Key active design measures include:

- Decentralised ventilation system with heat recovery. Air is supplied by under-floor Air Handling Units (AHUs) located on each level. This is highly energy

efficient, lower in embodied carbon than other AHU systems, and provides the best health benefits enabling individual floors control and isolation;

- AHUs to reduce the active cooling load by introducing more outside air when outdoor temperatures allow (<18°C external temperature) reducing operational energy use;
- A Building Energy Management System to ensure optimum efficiency of heating and cooling systems thorough automated monitoring and control;
- Hybrid system ensures chillers are efficiently sized; and
- Energy efficient lighting with daylight sensors to be installed. This would be ensured in tenant fit-out areas via a green lease agreement or equivalent.

1301. The proposed energy demand reduction strategy ('be lean') would achieve an emissions reduction of 6%, falling short of the GLA target of 15%.

'Be Clean'

1302. There are no existing District Heating networks in the area that the Development would be able to link to; however, there is a proposed heat network that would run adjacent to the site which could allow a future connection. Space provision is made within the design to allow for a future connection to a district heating network, with a plantroom allocated on level B1 for a plate heat exchanger.

1303. Contact has been made with the City of London and EON to discuss the potential for a future network connection, however no response has been received following provision of building information.

1304. As part of the energy strategy development, a heat network connection has been modelled using the Part L compliance simulation and has been shown to increase regulated CO, emissions. The application design adopts the preferred strategy of high efficiency heat pumps to maximise heat recovery within the building.

'Be Green'

1305. The proposed energy strategy is all electric, utilising a hybrid air source heat pumps (ASHP) system with heat recovery to meet all heating and cooling demand for the site.

1306. Available roof space is bound by competing requirements/benefits plant space for air source heat pumps/chillers, green roof for biodiversity and to mitigate the heat island effect. Due to roof constraints as well as overshadowing, no photovoltaic (PV) array is included in the proposed design. The percentage

emissions reduction against Part L 2021 at Be Green stage is 7%, bringing the cumulative emissions reduction to 16%.

Energy Use Intensity (EUI)

1307. The adopted GLA energy assessment guidance (2022) requires developments to calculate the Energy Use Intensity (EUI), a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA targets are set at 55 kWh/m^2(GIA)/year for EUI and 15 kWh/m2(GIA)/year for space heating demand.

1308. The estimated Energy Use Intensity at application stage is 112 kWh/m2. Opportunities to reduce this energy demand via improved plant efficiency and reduced tenant power loads are being investigated by the MEP engineers to inform the next design phase. The predicted space heating demand 5.7 kWh/m2.

1309. The development has signed up for NABERS UK Design for Performance process, which ensures best practice process would be implemented to deliver predicted energy performance in design stage to real building operation. The project is targeting 5.5-star NABERS UK. The NABERS UK star rating is based on the base build energy only, which excludes tenant lighting, small power and ICT.

Energy and emissions summary

1310. At application stage the energy strategy achieves a 16% emissions reduction against Part L, falling short of the 35% target, set out in London Plan policy SI 2. Due to the proposed building's specific mix of uses, form, and overall design, comparison against a notional building performance, as per the building regulations Part L methodology does not properly reflect the bespoke energy efficient design. A clearer picture can be ascertained from the operational carbon performance based on the modelled whole building energy use intensity (EUI). Using the base design criteria for tenant small power and lighting, the estimated EUI is 112 kWh/m^{2}GIA/yr whilst a reduced tenant power usage scenario results in an EUl of 93 kWh/m$^{2\cdot}$GIA/yr with the UKGBC 2025-30 target set at 90 kWh/m^{2}GIA/yr. These EUI estimates for the proposed development demonstrate good energy efficiency for the building type, form and uses.

1311. An updated energy strategy is required via condition prior to commencement excluding demolition, and at post-completion stage.

1312. A S106 clause is recommended requiring reconfirmation of this energy strategy approach at completion stage, and a carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed buildings. There is also 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.

Urban Greening and Biodiversity

1313. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2040) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context. Adopted Local Plan 2015 Policy DM19.2 promotes Urban Greening and Biodiversity, DM10.2 (Design of green roofs and walls) and DM10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

1314. Policy OS5 of the emerging City Plan 2040 requires the retention of existing mature and semi-mature trees and encourages additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate.

1315. The proposed development would provide significant greening improvements to the existing site, which currently has a limited green infrastructure consisting of a green roof featuring trees, shrubs, and amenity grassland, in addition to a single Ginkgo tree to the south-eastern corner.

1316. The landscape proposals seek to create a robust green infrastructure through a series of improvements which focus on accessible outdoor spaces and the enhancement of public realm. Changes include the introduction of approximately 875sq.m of intensive green roof space inclusive of planting on all external terraces. An extensive, biodiverse roof would be located on the cycle hub and pavilion building which would also feature 160sq.m of vertical greening. There is a total rainwater attenuation capacity of 330m^3.

1317. The applicant has undertaken lighting studies for the proposed green walls which shows that it would achieve sufficient lighting to ensure survivability and longevity subject to good maintenance and care including appropriate irrigation. Full details of this are required by recommended condition.

1318. The existing Ginkgo Biloba tree to the east of the Site, which sits outside the red line boundary is proposed to be retained, with additional planting formed

around it, creating a pocket park. The tree would be suitably protected throughout construction as outlined in the submitted Arboricultural Impact Assessment, secured by condition.

1319. Proposed ground-floor public realm greening would include the installation of 9 trees and low-level planting interspersed across the site, including the pocket park to the southeast of the development. The proposed planting specification focuses on a diverse range of disease-resistant species which, in addition to the green roofs, would collectively create on-site habitats for local wildlife, encouraging biodiversity.

1320. On-site habitat enhancement would focus on the provision of foraging resources and nesting opportunities for invertebrates, in addition to the use of bird boxes for Species of Local Conservation Concern including swifts, house sparrows, and black redstarts.

1321. Utilising the GLA's UGF guidance, the proposal would achieve a UGF of 0.271 which would not achieve the minimum target of 0.3. However, utilising the City's guidance, an Urban Greening Factor of 0.305 would be achieved which meets the policy requirements of the Draft City Plan 2040. The discrepancy in the two scores is attributable to differences in the calculation factors used for the London Plan and the City Plan, the latter of which gives higher scores to particular surface types to account for the City's highly urbanised context.

1322. There are a variety of constraints on the site which affect the quantity and type of greening available, including requirements to keep areas of public footway clear for pedestrian movement and visibility, underground services, clashes with façades and pedestrian flow, areas of low light levels identified in sunlight studies, and competing requirements on roof areas.

1323. The proposal would achieve a 248% biodiversity net gain which exceeds the minimum 10% requirement, although consideration is given to the existing site's low baseline resulting from its lack of vegetative habitats. The draft City of London Plan 2040 (Policy OS4) requires major developments to achieve a minimum target score of 3 biodiversity units per hectare (BU/ha). The proposal would achieve 0.83 BU/ha which is significantly lower than this target, which unfortunately is to be expected of development of this type and scale in the City Cluster.

1324. A detailed landscaping strategy outlining the quality and maintenance of the proposed urban greening and demonstrating opportunities explored during the design development stage to maximise contributions to urban greening and biodiversity is required by condition.

Climate Resilience

1325. Buildings that are being planned now will be subject to more extreme climate conditions during their lifetime than we current experience. London Plan Policy GG6 requires development to "ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect". Local Plan policy DM15.5 (Climate change resilience and adaptation) supports these outcomes.

Overheating and heat stress

1326. Policy SI 4 of The London Plan (2021) states that major development proposals should reduce potential overheating, and reliance on air-conditioning systems, and demonstrate this in accordance with its cooling hierarchy.

1327. To address urban heat island risks, the proposed development incorporates a climate-responsive environmental design strategy, focused on passive measures and the limiting of internal heat gains to minimise the need for cooling. This includes locating the longest façade to the north elevation to minimise solar heat gains whilst providing high quality light, with vegetated terraces to the west and east elevations protecting office space from direct solar radiation. Due to its location at the northern edge of the City's Eastern Cluster, the site benefits from being heavily shaded by adjacent towers to the south, east, and west. Additionally, the proposed development would result in further shading to the public realm which would contribute to the minimisation of heat-related pedestrian discomfort.

1328. Solar analysis has shown that only the smaller south-eastern and south-western façades would receive direct sunlight due to spacing of the current surrounding towers. These two façades would have highly selective glazing (VLT to g-value) to significantly reduce solar radiation whilst allowing high amount of daylight.

Flood Risk, Water Management and Drainage

1329. The GLA's London Plan 2021 Policy SI 12 gives specific guidance on the provision of flood resilience, which is relevant to this development, with Policy SI 13 noting that developments should aim to achieve greenfield runoff rates and ensure run-off is managed as close to the source as possible.

1330. The site is located within Flood Zone 1 - land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (< 0.1%). The addition of permeable paving is not possible due to the existing basement underneath covering a significant part of the site. A SuDs strategy combining attenuation tanks situated in the existing basement and blue roofs is proposed to attenuate surface water before discharge to the combined Thames Water sewer. The system has been designed to withstand a 1-in-100-year flood event with 40% climate change allowance in the surface water runoff. Surface water discharge would be restricted to 0.61 l/s providing a 99% betterment on existing 1 in 100-year rate.

1331. The basement's attenuation tank would also act as a smart rainwater harvesting tank outside of storm events which would assist in reducing potable water consumption. Potable water demand would also be reduced through water fittings specification, controls, leakage detection and greywater recycling. The proposal achieves a 60% potable water demand reduction compared to BREEAM baseline and achieve 5 BREEAM Wat 01 credits.

Natural Capital and Pests and Diseases

1332. The proposed development includes the following measures to minimise/mitigate the risk related to pests and diseases:

- Interior design to minimise touch points to prevent the spread of contact-based diseases;
- Cleaning protocols (including clear desk policies) to prevent the spread of bacteria;
- Decentralised (on-floor) ventilation system makes it possible to isolate individual floors or tenancies;
- Elevated ventilation rates (16 L/s/person);
- Consolidated, centralised and segregated waste storage that is ventilated and drained;
- Daily waste removals to avoids waste build up, minimising pests;
- Disease-resistant planting selected to discourage disease-carrying fauna; and
- Plant maintenance and management strategy critical to prevent pests and diseases thriving in proposed landscaping.

1333. The development proposal has taken full account of climate impacts including overheating, water scarcity, storm and flood risks and as such meets the requirements of London Plan Policy GG6, Local Plan Policy DM 15.5 (Climate change resilience) and Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk).

1334. Details of climate change resilience measures, with detailed modelling and planting plans, including comparison against the UK Climate Projections UKCP18 to 2080 (tools and data that show how the UK climate may change in the future, based on potential emissions scenarios) are required by conditions.

Sustainability Conclusion

1335. The City of London Climate Action Strategy (CAS) supports the delivery of a net zero, climate resilient City. The planning process supports the CAS through the consideration of how carbon analysis and reduction, circular economy principles and climate resilience measures are embedded into development proposals. The promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing is also critical.

1336. The proposed development has a high impact on embodied and whole life carbon emissions as well as construction waste as is the nature of redevelopment, involving large scale demolition and the construction of a tall building. However, the submission documents (Circular Economy Statement, WLCA etc.) clearly demonstrate a high level of analysis and iterative design process that have been undertaken to minimise carbon emissions, optimise operational performance, as well as to embed climate resilience measures and ensure adaptability and longevity in the design.

1337. Working to retain the existing substructure (48% of the existing building mass) and avoid emissions associated with its replacement, the applicant team has designed an efficient structural system. Combined with carbon options analysis of structural and façade systems and the inclusion of high recycled content material, the application stage WLCA demonstrates a good performance against the GLA benchmarks in terms of carbon emissions per metre squared.

1338. Extensive modelling has been undertaken to ensure the MEP system design is highly efficient, to reduce operational emissions, and minimise overheating within the chosen façade system a unitised aluminium curtain walling. The façade system is also designed for disassembly to facilitate ease of maintenance and future circular recovery of materials. The proposal meets the GLA and City policy requirements for Circular Economy and WLC. To ensure the best possible outcomes for reducing whole life cycle carbon emissions and improving the operational energy performance, details of best practice measures incorporated at technical design stage are requested by conditions.

1339. The proposed development also offers significant improvements to greening, biodiversity and public realm on a site which currently performs poorly in all categories. The proposal incorporates 875m2 of green roof and 160m2 of vertical greening, sustainable drainage, and water-saving features including rainwater harvesting and greywater recycling, enhancing amenity and supporting climate resilience.

1340. The proposed development would deliver a low carbon and energy efficient development of the highest sustainability quality that commits to a high 5.5* NABERS UK rating and is on track to achieve an "outstanding" BREEAM assessment rating for the proposed main use (offices), in overall compliance with London Plan policy SI 2, Local Plan policy CS15 as well as emerging City Plan 2040 policy DE1.

1341. The targets outlined are coupled with a strategy to achieve maximum flexibility, adaptability and material optimisation to satisfy the GLA's circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and 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 Draft City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

1342. London Plan Policy D11 ('Safety, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

1343. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 ('Security measures in new developments and around existing buildings') seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

1344. Emerging Strategic Policy S2 of the draft City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by ensuring that that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.

1345. The security proposals to protect the building, its users, and new areas of public realm have been development in consultation with the Designing Out Crime Officer and the counter terrorism security officers within the City of London Police at pre-application stage.

1346. The main office entrances and public realm market entrance would be freely accessible during working and opening hours. Outside of these hours, these access point would be locked and monitored via an access control system, and entrances and the public realm would be under video surveillance both externally and internally. Both the long stay and short cycle stay cycle storages would be under constant video surveillance, and additional security would be situated within the Cycle Hub to ensure efficient and effective security management of the area.

1347. The site would be protected by trees and planting around the perimeter as well as three bollards within the public realm at ground level, and further details of these protective measures would be required through condition and the public realm management plan secured in the S106 agreement.

1348. Security Lines would be situated within the building, providing restricted access to all staff, tenants, visitors, and contractors of the building. Turnstiles would be located at first floor level to allow controlled access to any occupiers. Further measures would be in place past the first floor in the form of access controls on lobby doors within tenant floors, and there would be a video surveillance system in place both internally and externally around the site for added security observation, and the use of access control systems. All security measures would be controlled from the security control room located within the building, ensuring complete management of all security measures in place, during the buildings operating hours, and outside of these hours.

1349. The building would have the ability to ‘lock down’ using physical measures in the event of an external threat, ensuring people do not enter danger areas and any threats are prevented from entering the building.

1350. Further details of the overall security strategy would be required by condition and through a S106 obligation, which would detail more specifically the measures to protect the building and its different user groups.

1351. The proposal, subject to conditions and S106 obligations, is considered to be in accordance with London Plan policy D11, Local Plan Policy DM3.2 and the emerging City Plan strategic policy S2.

Suicide Prevention

1352. Policy DM 3.2 of the adopted Local Plan 2015 ('Security measures in new developments and around existing buildings') aims to ensure that appropriate security measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm.

1353. Policy DE4 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.

1354. The City Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades.

1355. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps would be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1356. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:

K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access; and
(B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1357. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and

design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.

1358. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance.

1359. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.

1360. Regarding the proposals, there would be external terraces, accessible from the adjacent office floor plate on levels 8, 16, 24, 32, 40 and 48. These terraces may represent a potential risk to individuals attempting suicide from the building. A combination of physical barriers, staff training and surveillance are proposed to maximise the effectiveness of preventative measures, including measures that increase the potential for human intervention.

1361. Access to the external terraces would be for building occupants only and not the general public. A 2m tall screen would be located at these terraces to prevent any risk of terrace users from climbing over. Suitable species of planting would help to discourage movement to the perimeter of the building, and further measures would be in place such as suitable lighting and CCTV.

1362. A suicide prevention management plan would be secured by condition and subject to this condition, the proposal would comply with the relevant development plan policies, notably DM3.2.

Fire Statement

1363. A Fire Statement has been submitted outlining the fire safety strategy for the buildings which has been developed in consultation with the City District Surveyor's office. The statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. Subject to further detail regarding the interlocking stairs within the Pavilion building, the Fire Statement is considered acceptable for the planning stage and is secured by condition.

Assessment of Public Benefits and the NPPF Paragraph 215 balancing exercise

1364. Under s66 (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.

1365. When considering the impact of a proposal on the significance of designated heritage assets including listed buildings and registered historic parks and gardens, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paras 212 and 213).

1366. The proposal would result in varying levels of less than substantial harm via indirect setting impacts to the significance of the following listed buildings and registered historic park and garden:

- St Paul's Cathedral (Grade I) – low level of less than substantial harm;
- Horse Guards (Grade I), Whitehall Court (Grade II*) and War Office (Grade II*) – slight levels of less than substantial harm;
- St James's Park (RPG Grade I) – slight level of less than substantial harm (very much lower end of the spectrum);
- Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.

1367. Given the proposal would result in harm to the significance of a listed buildings, including Grade I listed buildings, and a Grade I Registered Historic Park and Garden, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits.

1368. The proposal would trigger paragraph 215 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'.

1369. London Plan policy D9 C (1; d) in the London Plan is also engaged; that policy states "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, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area."

1370. St Paul's Cathedral in their consultation response allege that the information is unsatisfactory and *"Therefore, we submit to the City that heritage impacts cannot be understood and weighed in the planning balance appropriately. In general, we do not consider the level of assessment provided is proportionate or satisfactory to inform the decision-makers fully and correctly."*

1371. Historic England *"strongly objects to this application and recommends that it should be withdrawn or refused. While it will be for your authority to balance all considerations in this case, the harm entailed by these proposals to the significance of one of the nation's finest buildings, to that of the historic buildings and landscape at Whitehall and St. James's Park, should attract the highest weight."*

1372. The GLA state "The proposed development is assessed to cause less than substantial harm to heritage assets (as identified above) and in all cases is either low or low to middle of the range. However, these harms could be outweighed by the public benefits of the scheme of secured and this will be assessed at the Mayor's decision making stage".

1373. Officers reach different conclusions to St Paul's Cathedral in relation to the information submitted which is considered to be proportionate and consistent with comparative application and addressed in the main report. Officers concur with statutory consultees as to the designated heritage assets which would be harmed but reach different professional conclusions as regards the extent and level of heritage harm to the Cathedral and St James's Park and other designated heritage assets, and this is exhaustively assessed in the relevant preceding paragraphs of this report.

1374. Officers also reach different conclusions to the GLA as regards harm to St Paul's Cathedral Conservation Area; and to St Ethelburga's Centre for Reconciliation and Peace, as regards St Ethelburga's letters of objection to the scheme, and to the London Diocesan Fund in relation to St Ethelburga's, All Hallows on-the-Wall and St Botolph's without Bishopsgate. In all cases,

officers identify no harm to these assets which again is set out robustly in the report.

1375. Public benefits could be anything that delivers economic, social or environmental objectives as described in the NPPF (para 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public to be genuine public benefits.

1376. Paragraph 212 of the NPPF states that 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). Paragraph 213 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. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 215 NPPF balancing exercise in relation to less than substantial harm to the significance of the listed buildings and RPG.

1377. Officers have negotiated and identified multi-faceted benefits stemming directly from the proposals. The key economic, environmental, and social public benefits which flow from the proposal are considered to be:

1378. <u>Economic:</u>

- The provision of 99,005 sqm of Grade A office floorspace, would contribute to 8.3% of the overall projected office floorspace requirements for the City to 2040 delivering an estimated net increase of 4635 FTE employees. This uplift is of a strategic quantity and would contribute significantly to inward investment in the Square Mile and supports the strategic objective to maintaining a world class city which is competitive and promotes opportunity;
- The provision of affordable creative workspace within the Pavilion Building which would encourage greater diversity of office workers;
- The enhanced public realm combined with the cultural offer would drive footfall and spend in the City during the day, evenings and weekends, as well as provide amenity space for the wellbeing of workers and visitors. The development is expected to generate between £5million and £8.4million per year in operational worker expenditure once complete;
- Adjacent land uses and occupiers would also benefit from this increase in footfall and the high-quality amenities provided by the proposed development, the proposals would contribute to the amenity of the wider area, the greater

provision of services and activities would help create an attractive environment for wider investment;

- 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;
- The provision of 2,410 sqm of accessible cultural uses in a unique, standalone cultural pavilion building, hosting art and artefact exhibitions, artistic performances, and creative studios, which would drive footfall and therefore increase spend in the City as well as provide leisure and educational opportunities for the wellbeing of workers, residents, and visitors; and
- The provision of 1,601sqm of new or improved external public realm across the site (1013% uplift) combined with improvements to the road layout would transform the appearance, image and function of the locale by making the area more enticing for people to visit and stop and dwell which would drive footfall and increase spend across the City.

1379. Collectively, given the nature and extent of these benefits, **substantial** weight should be attributed to them.

1380. <u>Environmental:</u>

- The proposal would assist in consolidating the City Cluster of tall buildings resulting in some minor enhancements of strategic and local neighbouring broughs views which are important to the character and identity of London including LVMF views from: Alexandra Place (1A); Primrose Hill (4A); Greenwich Park (5A); Blackheath Point (6A).
- It would deliver growth in a highly sustainable location which would assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- At a local level the proposal would result in significant enhancement of the public realm at ground level, delivering enhanced permeable public space, active and cultural uses which would enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new cultural uses which aligns with Destination City aspirations.
- The space has been designed to be flexible to fit into the future master planning of the City Cluster and network of future routes towards Liverpool Street and designed to accommodate increased pedestrian flows.
- The improvements to the public realm for pedestrians and cyclists, including pavement widening and streetscape enhancements, would encourage active travel and support the wellbeing of users, constituting a key social and environmental benefit in a highly congested area, subject to the detail being confirmed through a s278 agreement and S106 financial contributions for the enhancement of streets and spaces. It is the view of officers that satisfactory details can be secured through such agreements.

1381. Collectively these benefits are attributed **Moderate to substantial** weight.

1382. Social:

- The proposals would reimagine this part of the city by delivering a more pleasant and easily accessible, inclusive and well-connected place for all through the provision or improvement of several pedestrian routes and high-quality public spaces, totalling 1601sq.m of new or improved external public realm, providing opportunities for relaxation and leisure;
- The cultural proposals would attract new audiences, alongside the enhanced public realm, a new destination in the City would be created. The quality and extent of the public realm would support the social vibrancy of the area through encouraging activity on evenings and weekends. The site would attract visitors, increase tourism, support and enhance the image of the area;
- Learning and educational opportunities associated with the Pavilion building and significant scope for apprenticeships through the commercial floor space uplift;
- The provision of affordable creative workspace within the Pavilion building to encourage a more diverse workforce and attract groups from across London to the City;
- The unique combination of new cultural experiences, enhanced food and beverage and new/revitalised landscaped public spaces would promote socialisation, wellbeing and support vibrancy;
- The proposal for the unique standalone cultural building would bring a new dynamic to the City and facilitate a 7 day a week Destination City; and
- The proposal would secure a S.106 obligation of £4,489,800 towards affordable housing provision.

1383. Collectively these are attributed a **Moderate to Substantial** level of weight.

1384. In relation to the low level of less than substantial harm to St Paul's Cathedral (I), and slight harm to St James's Park (RPG), Horse Guards(I), Old War Office (II*) and Whitehall Court (II*), these are designated heritage assets of the highest order, and great weight should be attributed to the failure to preserve their settings and to the harm which would be caused, and considerable importance and weight should be given to the desirability of preserving the settings of the listed buildings. In this case the instances of harm identified would be relatively fleeting, affecting only specific viewing experiences of these assets, and considerably mitigated through design. As such, taking account of the nature of the harm to these designated heritage assets and of the heritage value of those assets, and giving great/considerable weight and importance to the harm, the overall weight attributed to that harm to those assets is low.

1385. Officers consider part D9 C (1; d) has been met through the amendments to the development to mitigate harm as far as possible with a particular focus on the setting and significance of the Cathedral. These amendments are addressed in detail in the relevant preceding sections of the report.

1386. When carrying out the paragraph 215 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the buildings or their setting. In this case, it is the view of officers that the collective package of the public benefits secured, and which flow from the development proposals, would decisively outweigh the heritage harms identified to the designated heritage assets, some of which are of the highest calibre, thus complying with para 215 of the NPPF.

1387. 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 strong presumption against granting planning permission is rebutted; the outcome of the paragraph 215 NPPF heritage balance falls in favour of the proposal, and policy D9 C (1; d) in the London Plan is also complied with.

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

1388. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1389. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

1390. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability including mobility impairment. In particular, the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender

reassignment and marital status. This would be achieved through measures such as the creation of step-free access to all parts of the site, the provision of resting/seating areas in the external landscape and public space. Where feasible this has been located at intervals no greater than 50m and disabled parking bays have been provided. Final details would be secured by condition in order to ensure equality of access. For example, furniture provisions such as cycle stands, bollards and seating areas are indicative and subject to future design detail and development. The provision of affordable creative workspace within the Pavilion Building in addition to the cultural opportunities presented to disadvantaged groups as part of the cultural offer would advance equality of opportunity.

1391. It is recognised that noise and disturbance during construction may have a disproportionate impact on certain groups. In particular given its proximity to the Site, there may also be an impact on the Church and congregation's use of the St Ethelburga's Centre and Peace Garden and on religious services taking place. This has been raised in objections received some of which comment that the proposed construction works would be harmful to the operation of the St Ethelburga's Centre for Reconciliation and Peace. These points have been considered in the report and conditions are recommended to mitigate the impacts so far as possible (including the submission of a scheme of protective works and construction management plans for approval). Given the temporary nature of the potential impacts combined with the mitigation measures set out herein, it is considered that any disadvantages suffered by persons who share a relevant characteristic would be minimised insofar as possible and that the proposals would not result in an adverse impact on the ability to use the surrounding churches as a place of worship and religious observance.

1392. It is noted that the Equality Act carries ongoing responsibilities which would continue once the development is complete. As part of considering the design of the building and the physical environment, property management teams for each buildings and public spaces would need to have suitable management policies and procedures to ensure the obligations of the Act are met once the buildings are in operation. This would include the proposed cultural spaces which currently do not have any end user finalised, but it is noted that Intermission Youth are anticipated to be the Cultural Anchor and Operator of the building. In formulating the cultural offer, the landowner should continue to engage with a full range of local stakeholders so that its offer is relevant and accessible to all.

Human Rights Act 1998

1393. 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")).

1394. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential or religious properties including by reason of loss of light or privacy. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the adverse impacts on nearby residential properties and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

1395. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

CIL and Planning Obligations

1396. 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 the payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1397. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1398. On the 1st 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).

1399. 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
MCIL 2 Payable	£13, 725, 363	£13,176,348	£549, 015

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£6,734,700	£6,397,965	£336,735
City Planning Obligations			
Affordable Housing	£4,489,800	£4,444,902	£44,898
Local Training, Skills, and Job Brokerage	£2,693,880	£2,666,941	£26,939
Carbon Reduction Shortfall *(as designed)* *Not indexed*	£1,193,337	£1,193,337	£0
Section 278 (Evaluation and Design Fee) *Not indexed*	£100,000	£100,000	£0
Security Measures Contribution (Eastern City Cluster)	£897,960	£888,980	£8,980

S106 Monitoring Charge	£6,000	£0	£6000
Total Liability in accordance with the City of London's Policies	**£16,115,677**	**£15,692,125**	**£423,552**

City's Planning Obligations

1400. 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*)
- Travel Plan (including Cycling Promotion Plan)
- Construction Monitoring Cost (£53,820 - *First Year of development and* £46,460 *for subsequent years*)
- Legible London Contribution (£35,000)
- Cycle Hire Contribution (£100,000 Indexed)
- A10 Improvement Works Contribution (£900,000 Indexed)
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (*CoL*)
- Section 278 Agreements (*Transport for London) (Construction period S278, and final S278 incorporating A10 Improvement Works Contribution)*
- Cycle Hub (*Provision of minimum 144 two tier cycle stands & Public Access*)
- Public Route (*Specification, Public Access - 24/7 - & Management Plan*)
- Public Realm Space (*Specifications, Public Access - 24/7 - & Management Plan*)
- City Market Management Plan (*including Public Access*)
- Pavilion Building Management Plan
- Cultural Plan
- Affordable Creative Workspace
- Recission of City Walkway* (to be undertaken by CoL)
- Designation of Permissive Path
- Television Interference Survey
- Wind Audit
- Solar Glare Audit
- Retention of RSHP Architects or equivalent team in quality and experience

1401. 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.

Monitoring and Administrative Costs

1402. 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.

1403. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Conclusions and Overall Planning Balance

1404. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

1405. Objections have been received from statutory consultees and third parties, 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 S106 obligations.

1406. The proposed development comprises the demolition of the existing buildings on site, retention and extension of the basement, and the building's replacement with an office-led tower incorporating high quality, flexible and accessible public realm at ground level, a unique standalone cultural pavilion building, and a public cycle hub. The proposal delivers a high quality, office-led development in the 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 international finance business centre.

1407. 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 8.3% of the required commercial space to meet projected economic and employment growth demand until 2040. This would be a highly strategic quantity of growth for one scheme to deliver. Over 139,845sq.m of Grade E commercial

floorspace, which would be flexible, sustainable and best-in-class Grade A office floorspace, suitable for an additional circa 4635 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, including SME's.

1408. As set out above, paragraph 125(c) of the NPPF states that, in considering development proposals, substantial weight [should be given] to the value of using suitable brownfield land within settlements for homes and other identified needs, and proposals for which should be approved unless substantial harm would be caused. This paragraph weighs in favour of the scheme.

1409. The Proposals would technically breach London Plan policy SD7 with regards the sequential test for cultural floorspace. However, the public benefits of the cultural proposals and the fact that they would support the primary business function of the City and the CAZ significantly outweighs the failure to undertake a sequential test.

1410. 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. 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. The wind microclimate impact of the development has been thoroughly assessed in 11 different configurations and the assessment concludes that there would be a negligible to minor beneficial impact on surrounding sensitive receptors, with most remaining suitable for their intended uses. All on-site receptors would be suitable for their intended uses.

1411. The building would be designed to high sustainability standards, including an air quality positive approach to minimising emissions and exposure to harmful pollutants, an increase in local greening and ecological value, energy efficient, targeting BREEAM 'Outstanding' and adopting Circular Economy Principles and integrated urban greening.

1412. The proposed development would provide inclusive, inviting, and animated spaces, with extensive urban greening creating a new and much needed public open space in the heart of the City Cluster for people to pass through or linger. The scheme delivers an increase of and significant enhancement to public realm through the opening of the ground floor, creating multiple routes through

the site, opening to Bishopsgate and Wormwood Street. The scheme would allow for greater connectivity with the emerging Cluster in the future, including a potential connection into the Tower 42 Estate and links to the new open space at 55 Bishopsgate, and the public realm would be open to the public 24 hours a day.

1413. In transportation terms the proposal would provide significant betterment of the local public realm and highway through an aspirational scope of works, secured through S278 Agreement, meeting the aspirations set out in the City's Transport Strategy and the emerging London Wall Corridor Study. 1,600 long term cycle parking spaces would be provided with associated shower and locker facilities, and 144 short stay spaces would be provided, along with the public cycle hub building. The scheme has been designed to encourage active travel to the site. On analysis of the pedestrian environment, it is concluded that the net uplift in walking trips around the site can be satisfactorily accommodated via the proposed pedestrian network. Servicing and delivery trips can be accommodated within an on-site loading bay, with all vehicles being able to access and egress in forward gear, and with sufficient consolidation to be secured through a delivery and servicing management plan. In respect of demolition and construction traffic, deconstruction and construction logistics plans would be required by condition.

1414. 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.

1415. The proposals are classed as a tall building under adopted and emerging policy, and the site is not located within an area identified as inappropriate for a tall building in the City's Local Plan. Officers have thoroughly assessed the qualitative impact of the proposals, and find while London Plan D9 would be very largely complied with, some conflict with London Plan D9 C (1:a:i) arises due to adverse impacts on designated heritage assets and views; for the same reason there is conflict with Local Plan Policy CS7 (3) and emerging policy S21 (5).

1416. Architecturally the proposal would achieve a rare, intrinsic elegance, being the intelligent resolution of the practical constraints of the site in an unusually

cohesive and finessed way. The sophistication of the tower and companion pavilion building, coupled with the people focussed ground floor and cultural offer would create a scheme of outstanding design quality.

1417. The proposals would have a transformational impact on the north-western fringe of the City Cluster - it's vibrancy, activation and permeability of the streetscene, providing a high-quality scheme with a responsive design that capitalises on the important gateway location. In particular, the public ground floor Market Hall and provision of new sheltered routes and public spaces, and the bespoke Cultural pavilion would inject activity and a much needed identity to create a pleasant new place in the City to linger, enjoy and experience, rather than just pass through.

1418. The proposal amounts to a complex and high-quality piece of design in response to local and pan-London contexts. it is considered the proposal would optimise the use of land, delivering high quality office space, offering a greater diversity and more active streetscape when compared to the existing building.

1419. The proposals would comply with Local Plan Policies 2015 CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.8, CS16, DM16.2, CS19, DM 19.1 and DM19.2, emerging City Plan Policies 2040 HL1, S8, S1, S8, DE1-3, DE4 (1-2) and DE5-8, S10, AT1, S14, OS1-OS3, OS5 ; and London Plan 2021 Policies Good Growth objectives GG1- GG3, GG5-GG6 D3, D4, D5 and D8; NPPF 2024 paras 131, 135, 137, 136 and 140 , National Design Guide and the City Public Realm SPD all which require high-quality public realm and increased urban greening.

1420. Objections and comments have been received from statutory consultees including Historic England, St. Paul's Cathedral, GLA, and third party objectors, relating to its impact on strategic views and the setting of designated heritage assets. This report has considered these objections in detail and identified where officers are in agreement on adverse impacts and where there are differences of professional opinion in terms of levels and extent of harm. The development of the proposals has sought to mitigate harm as far as possible through different design scenarios and the development is supported by a clear and convincing justification.

1421. The proposal has been sited on the north-western edge of the City Cluster which is central to the strategic growth balance in the City. This seeks to consolidate strategic growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of the City and London. In LVMF pan-London panoramas the development would

consolidate and enhance the visual appearance of the City Cluster on the skyline including 1A -2, 4A , 5A and 6A.

1422. There would be some momentary diminishment of the primacy of St Paul's Cathedral as the Strategically Important Landmark in LVMF River Prospects 15 B.1 and 15 B.2 and, to a lesser extent, LVMF 17 B.1 and 17B.2.The proposal would also slightly adversely affect the characteristics and composition of the Townscape LVMF View 26A St James's Park. Overall, the proposals the development draws some limited conflict with Local Plan Policy CS13 (1 and 2), emerging City Plan Policy S13 (1 and 2), London Plan Policy HC4 (A), GLA LVMF SPG and City of London Protected Views SPD and Westminster Draft Metropolitan Local Views SPD Views 34, V42 (A) and V 43 (A).

1423. Relatedly, in assessing indirect impacts to designated heritage assets, the following impacts have been identified and evaluated in the report: a low level of less than substantial harm to the significance of St Pauls Cathedral (grade I); very slight levels of less than substantial harm (very much lower end of the spectrum) to St James's Park (RPG Garde I); slight levels of less than substantial harm to the significance of Whitehall Court (grade II*), War Office (grade II*), and Horse Guards (grade I). Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.

1424. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

1425. Overall, the proposal would draw conflict with Local Plan Policies CS12 (1), DM 12.1 (1), draft City Plan 2040 policies S11(2) and, London Plan HC1 (C) and special regard should be paid to the desirability of preserving the building(s) or its setting or any features of special architectural or historic interest which it possesses, under the duty set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2024 policies.

1426. It is the view of officers that it is 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 is complied with, as policies relating to office floor space delivery, design and public realm would be complied with, as policies relating to tall buildings and emerging design policies would be very largely complied with that, notwithstanding the conflict with the following due

to impacts on designated heritage assets and views and the lack of an elevated public space: Local Plan policies CS7 (3) (Eastern Cluster), CS12 (1) (Historic Environment) , DM12.1 (1) (Managing Change affecting all heritage assets and spaces), C13 (1 and 2) (Protected Views); emerging City Plan policies 2040 S11 (2) (Historic Environment), S21 (5) (City Cluster); and London Plan policies D9 C (1; a; i) HC1 (C) (Heritage Conservation and Growth), HC4 (A) ; GLA LVMF SPG 2015 City of London Protected Views SPD 2012; and Westminster Draft Metropolitan Local Views SPD Views 34, V42 (A) and V 43 (A); and emerging City Plan 2040 DE4 (3), the proposals comply with the development plan when considered as a whole.

1427. 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.

1428. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals make would make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, Eastern/City Cluster, and public realm policies.

1429. 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.

1430. As set out in paragraph 212 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).

1431. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 215 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth (paragraph 85), also indicate that planning permission should be granted.

1432. 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.

1433. It is the view of officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

Consultation Responses:

Objection, Peter Rose, 23 September 2024
Objection, Ms Josephine Knowles, 1 October 2024
Objection, Mr Marco Sidoli, 2 October 2024
Objection, Mr Richard Doffman, 4 October 2024
Objection, Richard Doffman - Pixielink Limited, 4 October 2024
Objection, Elsie Roderiques, 4 October 2024

Objection, Dr Shereen Nizari, 6 October 2024
Objection, Dr Shereen Nizari, 6 October 2024 (dup)
Objection, Aminmohamed Juma, 6 October 2024
Objection, Lord Rowan Williams, 10 October 2024
Objection, Ms Ruwani Gunawardene, 12 October 2024
Objection, Sarah Young, 14 October 2024
Objection, Mrs DurgaMata Chaudhuri, 14 October 2024
Objection, Ms Amina Hirani, 14 October 2024
Objection, Ms Wendy-May Jacobs, 14 October 2024
Objection, Mr Michael Cawley, 15 October 2024
Objection, Mrs Susan Bolen, 15 October 2024
Objection, Ms Giedre Kleivaite, 15 October 2024
Objection, Mr Michael Gibbs, 15 October 2024
Objection, Ms Noeline Sanders, 15 October 2024
Objection, Sir Tony Baldry, 16 October 2024
Objection, Mr Anthony Bennett, 16 October 2024
Objection, Mrs Laura Janner-Klausner, 16 October 2024
Objection, St Ethelburga's Centre for Reconciliation and Peace, 16 October 2024
Objection, St Ethelburga's Centre for Reconciliation and Peace, 16 October 2024 (dup)
Objection, Dr Joy Carter, 16 October 2024
Neutral, The Metropolitan Public Gardens Association, 17 October 2024
Objection, The Wardens and Society of the Mistery or Art of the Leathersellers, 17 October 2024
Objection, Ms Theodora Cadbury, 17 October 2024
Objection, Dr Mark Owen, 17 October 2024
Objection, Miss Kelly Waugh, 17 October 2024
Objection, Ms Susie Talbot, 17 October 2024
Objection, Mr John Woodhouse, 17 October 2024
Objection, Dr Justine Huxley, 17 October 2024
Objection, Ms Jeanne Mynett, 17 October 2024
Objection, Mr Martin Weightman, 17 October 2024
Objection, Sue Nicholls, 18 October 2024
Objection, Dr Patrick Elf, 22 October 2024
Objection, DWD on behalf of London Diocesan Fund, 27 October 2024
Neutral, CBRE on behalf of Lloyds Bank PLC, 8 November 2024
Neutral, Eastern City Business Improvement District, 7 January 2025
Support, Justine Simons OBE - Deputy Mayor for Culture and Creative Industries, London, 9 January 2025
Support, Intermission Youth, 14 January 2025
Objection, Mr George Hayward, 20 January 2025

Consultee Responses:

Internal Consultations:
Memo, Strategic Infrastructure, 9 September 2024
Email, City of London Police, 9 September 2024
Memo, Lead Local Flood Authority, 14 November 2024
Memo, Environmental Resilience, 26 November 2024
Memo, Environmental Health, 26 November 2024
Memo, Air Quality, 14 January 2025

External Consultations:
Email, Health and Safety Executive, 10 September 2024
Letter, LB Hammersmith and Fulham, 10 September 2024
Letter, NATS Safeguarding, 11 September 2024
Letter, Environment Agency, 12 September 2024
Email, Active Travel England, 17 September 2024
Letter, London City Airport, 18 September 2024
Email, Thames Water, 20 September 2024
Letter, Royal Borough of Kensington and Chelsea, 20 September 2024
Letter, London Gatwick Airport, 25 September 2024
Letter, Historic England GLAAS, 26 September 2024
Letter, Natural England, 26 September 2024
Letter, Heathrow Airport Safeguarding, 27 September 2024
Email, Transport for London (London Underground Infrastructure Protection), 27 September 2024
Letter, Southwark Council, 27 September 2024
Letter, Crossrail Safeguarding, 30 September 2024
Email, LB Haringey, 03 October 2024
Letter, Lambeth Council, 8 October 2024
Letter, LB Tower Hamlets, 10 October 2024
Letter, Historic England, 11 October 2024
Letter, LB Richmond Upon Thames, 14 October 2024
Letter, London Review Panel, 14 October 2024
Letter, Surveyor to the Fabric of St Paul's Cathedral, 18 October 2024
Letter and Stage 1 Report, Greater London Authority, 21 October 2024
Letter, City of Westminster, 21 October 2024
Letter, Transport for London Spatial Planning, 29 October 2024
Letter, LB Camden, 5 November 2024
Email, Ministry of Housing, Communities and Local Government, 18 December 2024
Letter, Royal Borough of Greenwich, 23 December 2024
Email, Transport for London, 12 January 2025
Email, London City Airport, 15 January 2025

Application Documents:

- Completed Planning Application Form, prepared by DP9;
- CIL Form, prepared by DP9;
- Covering Letter, prepared by DP9, dated 2 August 2024;
- Site Location Plan, prepared by RSHP;
- Site Plan, prepared by RSHP;
- Drawing Issue Sheet and Addendum, prepared by RSHP;
- Planning Statement, including Draft Heads of Terms for Legal Agreement, prepared by DP9, August 2024;
- Environmental Statement, May 2024, prepared by Trium Environmental; including:
    - Volume 1 – Main Assessment
    - Volume 2 – Townscape, Heritage and Visual Impact Assessment (by The Townscape Consultancy with input from Millerhare)
    - Volume 3 – Technical Appendices
    - Non-Technical Summary
    - EIA Cumulative Schemes Review Note, 11 December 2024
- Ventilation and Extraction Statement, Ramboll, May 2024;
- Air Quality Positive Statement, Air Quality Consultants, May 2024;
- Air Quality Positive Note, Air Quality Consultants, 13 December 2024;
- Smart Infrastructure and Utilities Statement, Ramboll, May 2024;
- Cultural Plan, SRD Culture Ltd, August 2024;
- Design and Access Statement, RSHP, including Landscaping Statement by Andy Sturgeon Design and Access Statement by David Bonnett Associates, August 2024;
- Design and Access Statement Addendum 1, RSHP, 18 November 2024;
- Economic Benefits Statement, Trium, May 2024;
- Fire Statement, OFR Consultants, April 2024;
- Health Impact Assessment, Trium, May 2024;
- Equalities Impact Assessment, Trium, May 2024;
- Arboricultural Impact Assessment, Assystem, May 2024;
- Landscaping Drawings, Andy Sturgeon Design, May 2024:
    - Landscape GA Plan – Ground Floor, 737_P_00_100;
    - Landscape GA Plan – Typical External Terrace, 737_P_XX_150;
    - Landscape GA Plan – Level 48 External Terrace, 737_P_XX_151;
    - Landscape GA Plan – Typical Winter Gardens, 737_P_XX_152;
    - Landscape GA Plan – Roof Plan, 737_P_RF_100;
- Detailed Lighting Concept, Spiers Major, May 2024;
- Statement of Community Involvement, Kanda, May 2024;
- Security Needs Assessment, QCIC, May 2024;
- Suicide Prevention Statement, RSHP, September 2024;
- Circular Economy Statement, Atelier Ten, May 2024;
- Sustainability Statement, Atelier Ten, May 2024;
- Ecological Appraisal, Assystem, May 2024;
- Biodiversity Net Gain Assessment, Assystem, May 2024;

- Energy Strategy Report, Ramboll, November 2024;
- Flood Risk Assessment, AKTII, May 2024;
- Foul Water and Sustainable Urban Drainage Systems, AKTII, May 2024;
- Whole Life Cycle Carbon Statement, Atelier Ten, May 2024;
- Radiance-Based MDF Assessment, GIA, May 2024;
- Outdoor Thermal Comfort Assessment, GIA, May 2024;
- Outline Construction and Environmental Management Plan, Multiplex, May 2024;
- Operational Waste Management Plan, Momentum, May 2024;
- Framework Delivery and Servicing Plan, Momentum, May 2024;
- Framework Construction Logistics Plan, Momentum, May 2024;
- Framework Cycling Promotion Plan, Momentum, May 2024;
- Aviation Safeguarding Assessment, KL Grant Consulting, May 2024;
- Healthy Streets Transport Assessment, Momentum, May 2024;
- Heritage, Townscape and Visual Impact Clarifications and Adjustments, The Townscape Consultancy, November 2024;
- WLCA Third Party Review, Heyne Tillett Steel, 2 January 2025;
- Email RE: Tower Hamlets Design and Heritage Response, DP9, 9 January 2025;
- TfL Comment Response Note, Momentum, 10 January 2025;
- Applicant Response to St Ethelburga's Centre for Reconciliation and Peace, Brookfield/DP9, 17 January 2025;
- Applicant Response to All Hallows on-the-Wall, Brookfield/DP9, 17 January 2025; and
- Applicant Response to St Botolph-without-Bishopsgate, Brookfield/DP9, 17 January 2025.

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

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 the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The description of development refers to a number of flexible uses for certain areas of the development, as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses and therefore impacts. Therefore, the Local Planning Authority need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The 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 note submitted outside of Regulation 25 of the EIA Regulations addresses the likely significant effects caused by a number of cumulative developments within a 400m radius that were amended since or omitted from the original ES. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum note 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 space and cultural uses. 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. These conditions are set out in the schedule below.

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 the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and a Travel Plan including a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures as required. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions, and the S278 agreements. 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

Relevant London Plan Policies

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall Buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public Toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and Woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SI13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets

- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning Guidance (SPG/LPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Planning for Equality and Diversity in London SPG (October 2007);
- All London Green Grid SPG (March 2012);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Sustainable Design and Construction SPG (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);
- London World Heritage Sites SPG (March 2012);
- Social Infrastructure SPG (May 2015);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

Relevant Emerging City Plan 2040 policies

- Draft Strategic Policy S1: Health and Inclusive City
- Draft Policy HL1: Inclusive buildings and spaces
- Draft Policy HL2: Air quality
- Draft Policy HL3: Noise
- Draft Policy HL4 Contaminated land and water quality
- Draft Policy HL5: Location and protection of social and community facilities
- Draft Policy HL6: Public Toilets
- Draft Policy HL9: Health Impact Assessment (HIA)
- Draft Strategic Policy S2: Safe and Secure City
- Draft Policy SA1: Publicly accessible locations
- Draft Policy SA2 Dispersal Routes
- Draft Policy SA3: Designing in Security
- Draft Policy HS3: Residential Environment
- Draft Strategic Policy S4: Offices

- Draft Policy OF1: Office Development
- Draft Policy OF2: Protection of Existing Office Floorspace
- Draft Policy OF3 Temporary ‘Meanwhile’ Uses
- Draft Strategic Policy S5 Retail and Active Frontages
- Draft Policy RE2 Active Frontages
- Draft Policy RE3 Specialist Retail Uses and Clusters
- Draft Policy RE4 Markets
- Draft Strategic Policy S6: Culture and Visitors
- Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Draft Policy CV3: Provision of Visitor Facilities
- Draft Policy CV5 Evening and Night-Time Economy
- Draft Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Draft Policy N1 Infrastructure Provision and Connection
- Draft Policy IN1: Infrastructure Capacity
- Draft Strategic Policy S8: Design
- Draft Policy DE1: Sustainable Design
- Draft Policy DE2: Design Quality
- Draft Policy DE3: Public Realm
- Draft Policy DE4: Terraces and Elevated Public Spaces
- Draft Policy DE5 Shopfronts
- Draft Policy DE6 Advertisements
- Draft Policy DE7: Daylight and Sunlight
- Draft Policy DE8: Lighting
- Draft Strategic Policy S9: Transport and Servicing
- Draft Policy VT1: The impacts of development on transport
- Draft Policy VT2 Freight and Servicing
- Draft Policy VT3: Vehicle Parking
- Draft Strategic Policy S10: Active Travel and Healthy Streets
- Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Draft Policy AT2: Active Travel including Cycling
- Draft Policy AT3: Cycle Parking
- Draft Strategic Policy S11: Historic Environment
- Draft Policy HE1: Managing Change to Historic Environment Development
- Draft Policy HE2: Ancient Monuments and Archaeology
- Draft Policy HE3: Setting of the Tower of London World Heritage Site
- Draft Strategic Policy S12: Tall Buildings
- Draft Strategic Policy S13: Protected Views
- Draft Strategic Policy S14: Open Spaces and Green Infrastructure
- Draft Policy OS1: Protection and Provision of open spaces
- Draft Policy OS2: City Urban Greening
- Draft Policy OS3: Biodiversity
- Draft Policy OS4: Biodiversity Net Gain

- Draft Policy OS5 Trees
- Draft Strategic Policy S15: Climate Resilience and Flood Risk
- Draft Policy CR1: Overheating and Urban Heat Island Effect
- Draft Policy CR2: Flood Risk
- Draft Policy CR3 Sustainable Drainage Systems (SuDs)
- Draft Policy CR4 Flood Protection and Flood Defences
- Draft Strategic Policy S16: Circular Economy and Waste
- Draft Strategic Policy S21: City Cluster Key Area of Change
- Draft Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- 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 Guidelines, 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, July 2016
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy October 2024

Relevant Local Plan Policies

CS1 Provide additional offices

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

DM1.4 Temporary use of vacant offices

1) To permit the temporary use of vacant office buildings and sites by other uses where such uses would not produce unacceptable amenity conflicts nor prejudice the eventual return of the site to office use.

2) To refuse the temporary replacement of vacant offices with housing where it would adversely affect the existing beneficial mix of commercial uses.

DM1.5 Mixed uses in commercial areas

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

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

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

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

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;

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

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

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

CS3 Ensure security from crime/terrorism

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

DM3.1 Self-containment in mixed uses

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

DM3.2 Security measures

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

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

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

DM3.3 Crowded places

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

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

DM3.4 Traffic management

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

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

DM3.5 Night-time entertainment

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

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

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

CS4 Seek planning contributions

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

CS7 Meet challenges of Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

CS10 Promote high quality environment

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

DM10.1 New development

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

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

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

DM10.2 Design of green roofs and walls

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

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

DM10.3 Roof gardens and terraces

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

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

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

DM10.4 Environmental enhancement

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

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

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

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

CS11 Encourage art, heritage and culture

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

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

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

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM12.5 Historic parks and gardens

1. To resist development which would adversely affect gardens of special historic interest included on the English Heritage register.

2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;
b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

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

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

DM15.2 Energy and CO2 emissions

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

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

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

DM15.3 Low and zero carbon technologies

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

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

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

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

DM15.4 Offsetting carbon emissions

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

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

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

DM15.5 Climate change resilience

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

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

DM15.6 Air quality

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

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

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

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

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

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

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

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

DM16.2 Pedestrian movement

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

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

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

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

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

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

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

DM16.3 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.

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

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

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

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

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

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

DM19.1 Additional open space

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

2. New open space should:

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

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

DM19.2 Biodiversity and urban greening

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

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

CS20 Improve retail facilities

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

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

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

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

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

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

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

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

CS22 Maximise community facilities

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

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:

   a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
   b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or

c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
b) in locations which are convenient to the communities they serve;
c) in or near identified residential areas, providing their amenity is safeguarded;
d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

DM22.2 Provision of Public Toilets

A widespread distribution of public toilets which meet public demand will be provided by:

a) 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;
b) supporting an increase in the membership of the Community Toilet Scheme;
c) resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
d) 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.

APPENDIX C

Methodologies for Assessing Daylight, Sunlight and Overshadowing New Development

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

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

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

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

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

Interior Daylighting Recommendations

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

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

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

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

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

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

Existing Buildings

Daylight to Existing Buildings

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

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

proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

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

Sunlight to Existing Buildings

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

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

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

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

Interpreting Assessment Data

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which

are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

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

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

Setting Alternative Target Values (including Mirror Massing)

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

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

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

Opens Spaces

Overshadowing

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

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun

is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessing the Cumulative Impact of Development Proposals

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

Supplementary Methods of Assessment

Radiance Based Daylight Factor Assessment

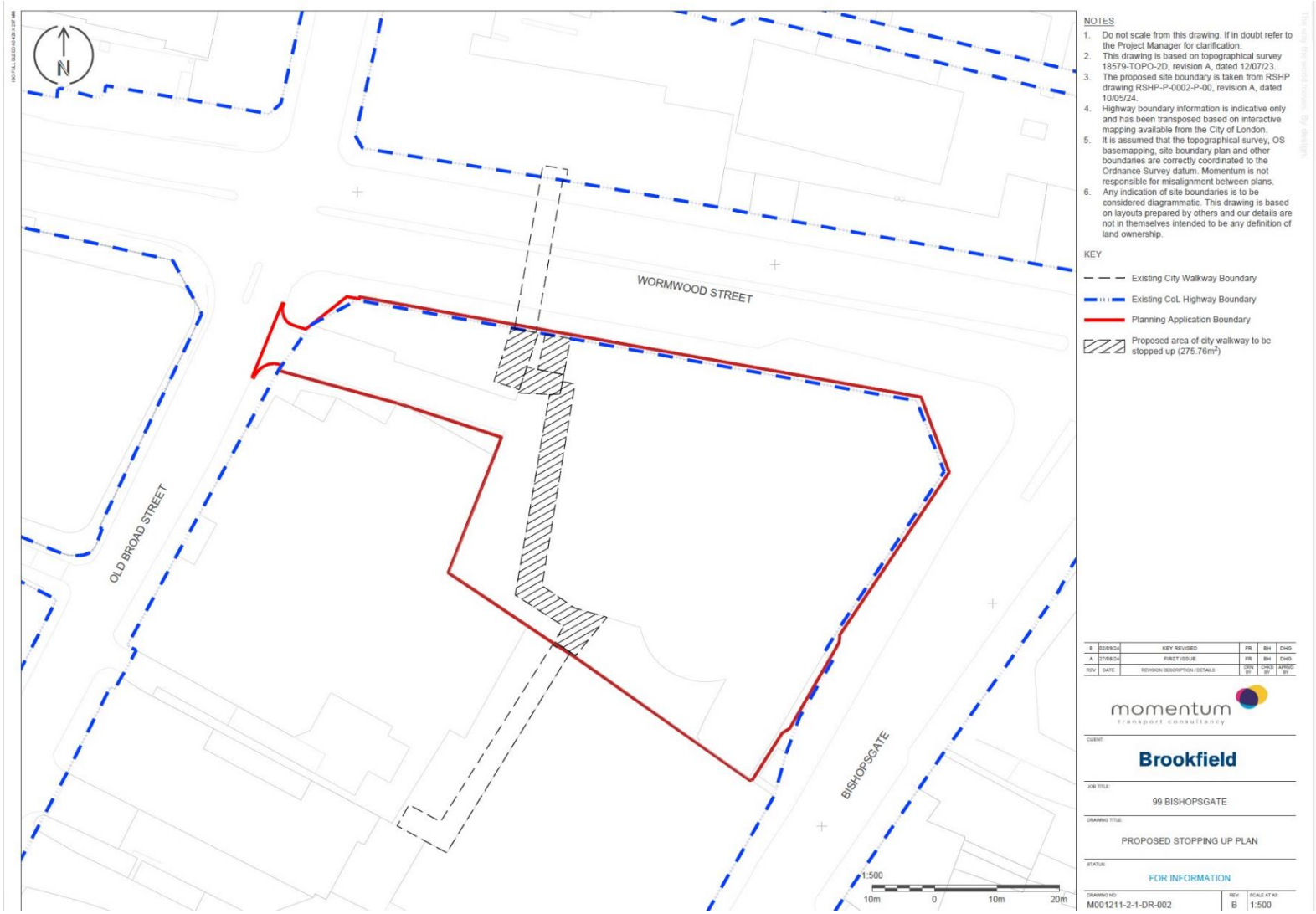
A radiance-based daylight factor assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance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

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

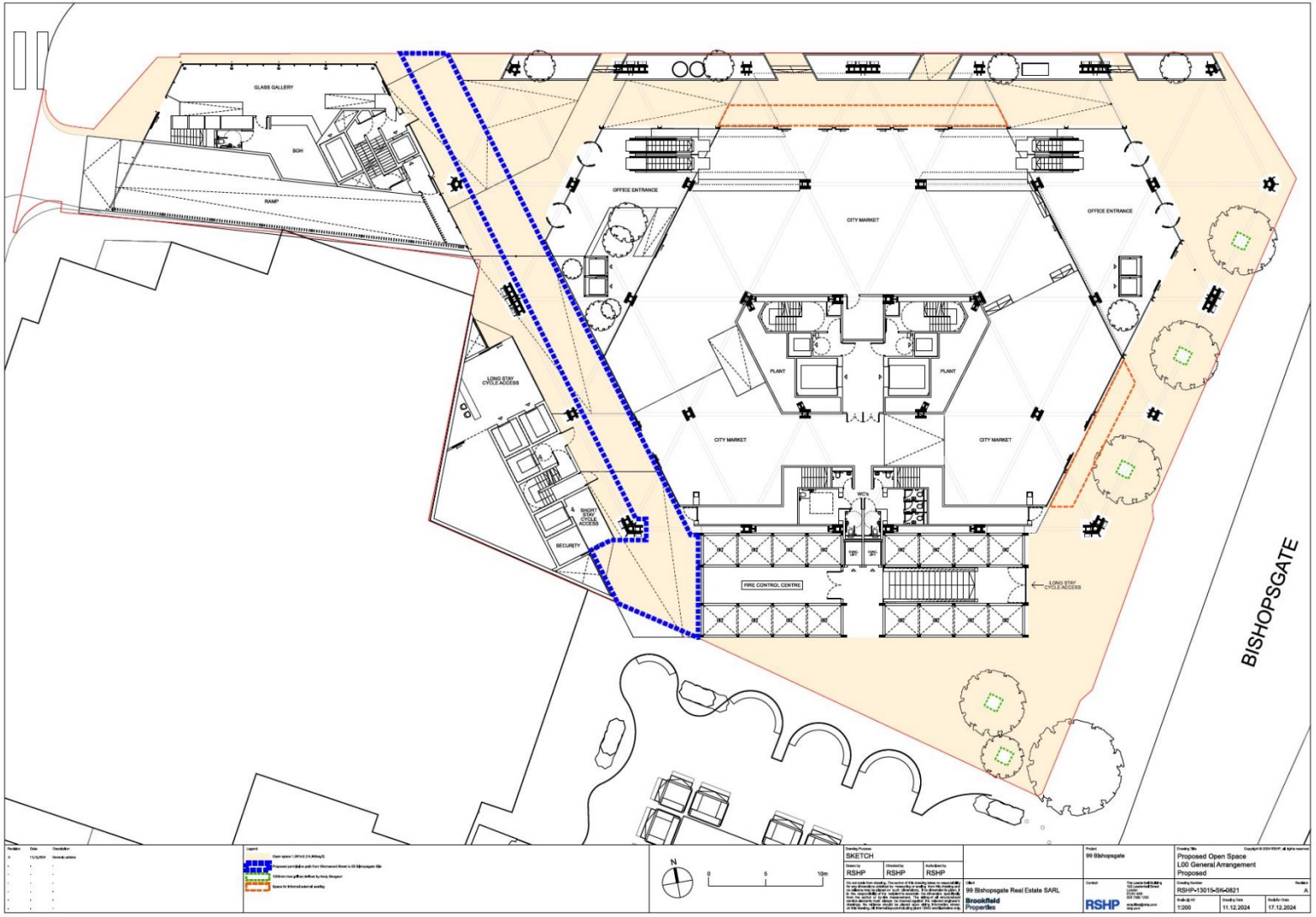
Radiance-based assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a ‘radiance based’ ADF percentage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

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

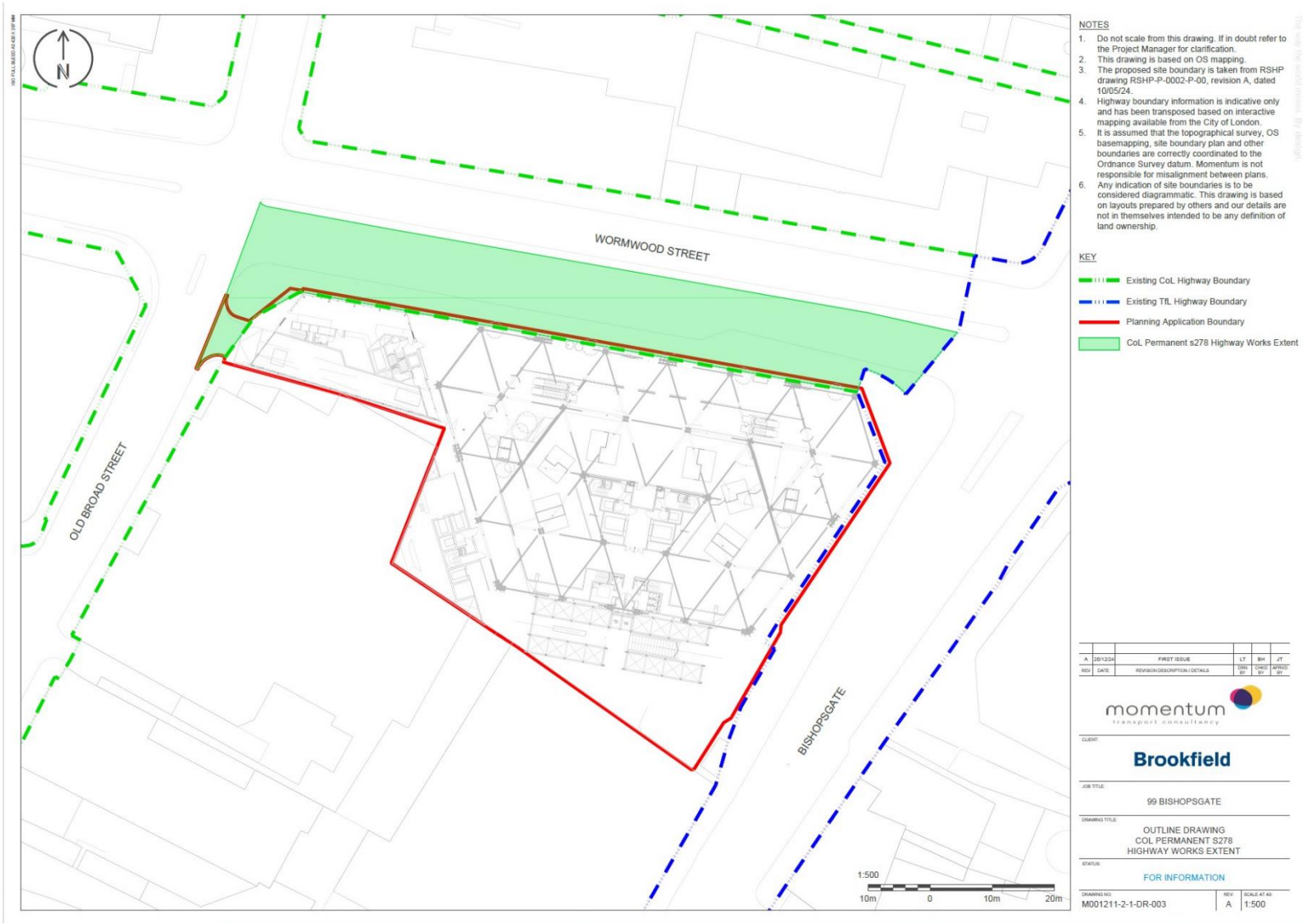
APPENDIX D – City Walkway Rescission Plan



APPENDIX E – Proposed Public Space Plan



APPENDIX F – Proposed Indicative S278 Works Plan



SCHEDULE

APPLICATION: **24/00836/FULEIA**

99 Bishopsgate London EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

CONDITIONS

SEE OVERLEAF

Compliance	
1	**Time Limit** The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
102	**Approved Drawings** 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: RSHP-P-0001-P-00 – Rev A - Location Plan – Existing; RSHP-P-0002-P-00 – Rev A - Site Plan – Existing; RSHP-P-1000-P-LG - Demolition: Existing Level Lower Ground; RSHP-P-1001-P-LM - Demolition: Existing Level Lower Mezzanine; RSHP-P-1002-P-00 - Demolition: Existing Level Ground; RSHP-P-1003-P-01 - Demolition: Existing Level 01; RSHP-P-1004-P-02 - Demolition: Existing Level 02; RSHP-P-1005-P-03 - Demolition: Existing Level 03; RSHP-P-1006-P-04 - Demolition: Existing Level 04; RSHP-P-1007-P-05 - Demolition: Existing Level 05; RSHP-P-1008-P-06 - Demolition: Existing Level 06; RSHP-P-1009-P-07 - Demolition: Existing Level 07; RSHP-P-1010-P-08 - Demolition: Existing Level 08; RSHP-P-1011-P-09 - Demolition: Existing Level 09; RSHP-P-1012-P-10 - Demolition: Existing Level 10; RSHP-P-1013-P-11 - Demolition: Existing Level 11; RSHP-P-1014-P-12 - Demolition: Existing Level 12; RSHP-P-1015-P-13 - Demolition: Existing Level 13; RSHP-P-1016-P-14 - Demolition: Existing Level 14; RSHP-P-1017-P-15 - Demolition: Existing Level 15; RSHP-P-1018-P-16 - Demolition: Existing Level 16; RSHP-P-1019-P-17 - Demolition: Existing Level 17; RSHP-P-1020-P-18 - Demolition: Existing Level 18; RSHP-P-1021-P-19 - Demolition: Existing Level 19; RSHP-P-1022-P-20 - Demolition: Existing Level 20; RSHP-P-1023-P-21 - Demolition: Existing Level 21; RSHP-P-1024-P-22 - Demolition: Existing Level 22; RSHP-P-1025-P-23 - Demolition: Existing Level 23; RSHP-P-1026-P-24 - Demolition: Existing Level 24; RSHP-P-1027-P-25 - Demolition: Existing Level 25 RSHP-P-1028-P-26 - Demolition: Existing Level 26; RSHP-P-1029-P-27 - Demolition: Existing Level 27; RSHP-P-1030-P-RF - Demolition: Existing Roof Level;

	RSHP-P-1100-E-S - Demolition: Existing Elevation – South; RSHP-P-1101-E-W - Demolition: Existing Elevation – West; RSHP-P-1102-E-N - Demolition: Existing Elevation – North; RSHP-P-1103-E-E - Demolition: Existing Elevation – East; RSHP-P-1200-S-AA - Demolition: Existing Section-AA; RSHP-P-1201-S-BB - Demolition: Existing Section-BB; RSHP-P-3000-P-00 – Rev A - Site Location Plan – Proposed; RSHP-P-3100-P-B3 - General Arrangement: Proposed Basement Level B3; RSHP-P-3101-P-B2 - General Arrangement: Proposed Basement Level B2; RSHP-P-3102-P-B1 - General Arrangement: Proposed Basement Level B1; RSHP-P-3103-P-00 - General Arrangement: Proposed Ground Floor; RSHP-P-3104-P-0M - General Arrangement: Proposed Ground Floor Mezzanine; RSHP-P-3105-P-01 - General Arrangement: Proposed Level 01; RSHP-P-3106-P-02 - General Arrangement: Proposed Level 02; RSHP-P-3107-P-03 - General Arrangement: Proposed Level 03; RSHP-P-3108-P-04 - General Arrangement: Proposed Level 04; RSHP-P-3109-P-05 - General Arrangement: Proposed Level 05; RSHP-P-3110-P-06 - General Arrangement: Proposed Level 06; RSHP-P-3111-P-07 - General Arrangement: Proposed Level 07; RSHP-P-3112-P-08 - General Arrangement: Proposed Level 08; RSHP-P-3113-P-09 - General Arrangement: Proposed Level 09; RSHP-P-3114-P-10 - General Arrangement: Proposed Level 10; RSHP-P-3115-P-11 - General Arrangement: Proposed Level 11; RSHP-P-3116-P-12 - General Arrangement: Proposed Level 12; RSHP-P-3117-P-13 - General Arrangement: Proposed Level 13; RSHP-P-3118-P-14 - General Arrangement: Proposed Level 14; RSHP-P-3119-P-15 - General Arrangement: Proposed Level 15; RSHP-P-3120-P-16 - General Arrangement: Proposed Level 16; RSHP-P-3121-P-17 - General Arrangement: Proposed Level 17; RSHP-P-3122-P-18 - General Arrangement: Proposed Level 18; RSHP-P-3123-P-19 - General Arrangement: Proposed Level 19; RSHP-P-3124-P-20 - General Arrangement: Proposed Level 20; RSHP-P-3125-P-21 - General Arrangement: Proposed Level 21; RSHP-P-3126-P-22 - General Arrangement: Proposed Level 22; RSHP-P-3127-P-23 - General Arrangement: Proposed Level 23; RSHP-P-3128-P-24 - General Arrangement: Proposed Level 24; RSHP-P-3129-P-25 - General Arrangement: Proposed Level 25; RSHP-P-3130-P-26 - General Arrangement: Proposed Level 26; RSHP-P-3131-P-27 - General Arrangement: Proposed Level 27; RSHP-P-3132-P-28 - General Arrangement: Proposed Level 28; RSHP-P-3133-P-29 - General Arrangement: Proposed Level 29; RSHP-P-3134-P-30 - General Arrangement: Proposed Level 30; RSHP-P-3135-P-31 - General Arrangement: Proposed Level 31; RSHP-P-3136-P-32 - General Arrangement: Proposed Level 32; RSHP-P-3137-P-33 - General Arrangement: Proposed Level 33; RSHP-P-3138-P-34 - General Arrangement: Proposed Level 34;

	RSHP-P-3139-P-35 - General Arrangement: Proposed Level 35; RSHP-P-3140-P-36 - General Arrangement: Proposed Level 36; RSHP-P-3141-P-37 – Rev A - General Arrangement: Proposed Level 37; RSHP-P-3142-P-38 – Rev A - General Arrangement: Proposed Level 38; RSHP-P-3143-P-39 - General Arrangement: Proposed Level 39; RSHP-P-3144-P-40 - General Arrangement: Proposed Level 40; RSHP-P-3145-P-41 - General Arrangement: Proposed Level 41; RSHP-P-3146-P-42 - General Arrangement: Proposed Level 42; RSHP-P-3147-P-43 - General Arrangement: Proposed Level 43; RSHP-P-3148-P-44 - General Arrangement: Proposed Level 44; RSHP-P-3149-P-45 - General Arrangement: Proposed Level 45; RSHP-P-3150-P-46 - General Arrangement: Proposed Level 46; RSHP-P-3151-P-47 - General Arrangement: Proposed Level 47; RSHP-P-3152-P-48 - General Arrangement: Proposed Level 48; RSHP-P-3153-P-49 - General Arrangement: Proposed Level 49; RSHP-P-3154-P-50 - General Arrangement: Proposed Level 50; RSHP-P-3155-P-51 - General Arrangement: Proposed Level 51; RSHP-P-3156-P-52 - General Arrangement: Proposed Level 52; RSHP-P-3157-P-53 - General Arrangement: Proposed Level 53; RSHP-P-3158-P-54 – Rev A - General Arrangement: Proposed Level 54; RSHP-P-3159-P-55 – Rev A - General Arrangement: Proposed Level 55; RSHP-P-3160-P-56 - General Arrangement: Proposed Level 56; RSHP-P-3161-P-57 - General Arrangement: Proposed Level 57; RSHP-P-3162-P-58 - General Arrangement: Proposed Level 58; RSHP-P-3163-P-RF - General Arrangement: Proposed Roof Plan; RSHP-P-3200-RCP-00 - General Arrangement: Proposed Public Arcade Soffits; RSHP-P-4000-E-N - General Arrangement: Proposed Elevation in Context – North; RSHP-P-4001-E-SE – Rev A - General Arrangement: Proposed Elevation in Context - South East; RSHP-P-4002-E-SW – Rev A - General Arrangement: Proposed Elevation in Context - South West; RSHP-P-4100-E-N - General Arrangement: Proposed Elevation – North; RSHP-P-4101-E-E – Rev A - General Arrangement: Proposed Elevation – East; RSHP-P-4102-E-S – Rev A - General Arrangement: Proposed Elevation – South; RSHP-P-4103-E-W – Rev A - General Arrangement: Proposed Elevation – West; RSHP-P-4104-E-X - General Arrangement: Proposed Pavilion + Bicycle Hub; RSHP-P-5000-S-AA - General Arrangement: Proposed Section AA; RSHP-P-5001-S-BB – Rev A - General Arrangement: Proposed Section BB; RSHP-P-5002-S-WG - General Arrangement: Proposed Section Winter Gardens; RSHP-P-6000-D-XX - Detail Bay: N Elevation Lower Levels; RSHP-P-6001-D-XX – Rev A - Detail Bay: S Elevation External Core;

	RSHP-P-6002-D-XX – Rev A - Detail Bay: SE Elevation Typical Floor with Wintergarden; RSHP-P-6003-D-XX – Rev A - Detail Bay: N Elevation Typical Floor; RSHP-P-6004-D-XX – Rev A - Detail Bay: N Elevation Typical Floor with Terrace; RSHP-P-6005-D-XX – Rev A - Detail Bay: N Elevation Upper Level Terrace; RSHP-P-6006-D-XX – Rev A - Detail Bay: E Elevation External Core; RSHP-P-6007-D-XX - Detail Bay: N Elevation Pavilion Lower Levels; RSHP-P-6008-D-XX - Detail Bay: N Elevation Pavilion Upper Levels; RSHP-P-6009-D-XX - Detail Bay: NE Elevation Cycle Hub; RSHP-P-6010-D-XX - Detail Bay: S Elevation External Core; REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.
3	**Car Parking** A minimum of one car parking space suitable for use by people with disabilities shall be provided on the premises in accordance with the approved details and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
4	**Larger Cycle Spaces** Unless otherwise approved in writing by the Local Planning Authority, a minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people. REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DMI0.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.
5	**Cycle Parking** Unless otherwise agreed in writing by the Local Planning Authority, a minimum of 195 showers and 1,320 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

6	**Headroom** Unless otherwise agreed in writing by the Local Planning Authority, clear unobstructed minimum headroom of 4.75m must be maintained for the life of the building in the refuse/skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.2m must be provided and maintained over the remaining areas and access ways. REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
7	**Servicing Ancillary** Except as may be approved in writing by the Local Planning Authority, the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto. REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
8	**Servicing** Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
9	**Public Realm Levels** The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway. REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
10	**Refuse Facilities** The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

	REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
11	**No doors over public highway** No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 1900.
12	**GPDO Telecoms** Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building (to the roof above the building line), including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
13	**BMU** At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
	Air Quality
14	**Generators** Prior to the installation of any generator, full details of the proposed generator(s) shall be submitted for approval. Any diesel generator must be shown to comply with the emission requirements of the City of London Air Quality Supplementary Planning Document. Any generator shall be used solely on brief intermittent, exceptional occasions and for necessary testing, as per manufacture requirements, to meet that purpose and shall not be used at any other time. REASON: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2025 and the London Plan Policies SI1 and SD4 D.

15	**AQIA** Prior to any generator(s) being commissioned and installed in the Pavillion Building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the proposed generators will minimise emissions and exposure to air pollution during operation and will comply with the City of London Air Quality Supplementary Planning Document. The measures detailed in the assessment shall thereafter be maintained in accordance with the approved assessment(s) for the life of the operation of the building. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D.
16	**AQNA** Prior to the installation of any generator(s) to be used for any purpose outside of emergency life-safety, a revised air quality neutral assessment that considers the building emissions must be submitted and approved in writing by the Local Planning Authority. The air quality neutral assessment must follow the latest air quality neutral guidance. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan.
17	**Flues** Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces. REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2025, Local Plan Policy DM15.6 and London Plan policy SI1.
18	**NRMM**

	Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
Environmental Health	
19	**Roof Terrace Hours** The roof terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance. 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.
20	**Roof Terrace Music** No amplified 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.
21	**Scheme of Protective Works - Demolition** 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.
22	**Scheme of Protective Works - Construction** 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.
23	**Piling – Sewer Vents** Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building. REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in

	order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
24	**Sound insulation** The proposed office development (main tower, excluding pavilion) 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.
25	**Fume extract arrangements** Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues should 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 commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
26	**Extract and ventilation** No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues shall terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission. REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
27	**Ventilation Maintenance**

	All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
28	**Plant Noise** 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. Emergency plant will be expected to meet this criterion. (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.
29	**Vibration** Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
30	**Contaminated Land** Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works

	shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events): a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development. b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work. c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
Flooding/Water	
31	**Thames Water Piling - sewerage** 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.
32	**Thames Water – waste capacity** There shall be no occupation beyond 17,800 sqm of office space until confirmation has been provided that either: - 1. All combined waste water network upgrades required to accommodate the additional flows from the development have been completed; or - 2. A development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation of the commercial floorspace shall take place other than in accordance with the agreed development and infrastructure phasing plan. REASON: Network reinforcement works are likely to 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.
33	**Thames Water – water capacity** 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.

34	**Thames Water Piling - water** 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.
35	**SuDS** Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: - attenuation systems (including green-blue roofs), rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.61l/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 380m3; (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; and (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
36	**SuDS Maintenance** 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.
Archaeology	
37	**Written Scheme of Investigation** No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Aviation	
38	**Aviation – Radar Mitigation Scheme**

	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, and London City Airport.
39	**Aviation – Radar Mitigation Scheme Implementation** No construction work shall be carried out above 120m 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 and London City Airport.
40	**Aviation – Crane Operation Plan** 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 and London City Airport.
41	**Aviation – NATS Notification** Prior to any works commencing on site; the developer shall notify NATS (En Route) plc of the following: i) the date construction starts and is due to end; ii) the location, dates and maximum height of all construction equipment rising above 150 metres above ground level. REASON: In the interests of the aviation safety.
42	**Aviation – LCY, Instrument Flight Procedures (IFP) Impact** No construction works above 155m AOD shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. The IFP assessment must consider the proposed building and any subsequent cranes used for construction.

	REASON: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.
43	**Aviation – LCY, Construction Methodology** No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport. REASON: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.
44	**Aviation – LCY, Building Obstacle Lighting** Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development. Obstacle Lighting can be installed on the western edge of the roof. This is to ensure the western edge of the building cluster is marked sufficiently. REASON: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.
45	**Aviation – LHR, Radar Mitigation** No development shall take place until mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar at Heathrow Airport. REASON: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.
46	**Aviation – LHR, Construction Management Strategy** The development hereby permitted shall not commence until a construction management strategy has been submitted to and approved

	in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters*:* *- details of cranes and other tall construction equipment (including the details of obstacle lighting) – Such schemes shall comply with Advice Note 4 'Cranes' (available at* http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf*).* The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period. REASON: To ensure that construction work and construction equipment on the site and adjoining land does not breach the Safeguarding Surfaces surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.
Sustainability	
47	**Circular Economy** (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. (b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and

	draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 ; S16, CEW 1, emerging City Plan 2040 policy DE1.
48	**Post-Construction Circular Economy** No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details 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 501 proposed targets stated in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
49	**Whole Life Cycle Carbon Emissions** a. Prior to the commencement of the development, 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 achieve at least the GLA's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. b. If less than 50% of the existing substructure can be retained - for the purpose of supporting the new development, thereby avoiding emissions associated with new construction- a detailed justification for substructure demolition shall be submitted to the Local Planning Authority. To help mitigate the associated impact of substructure demolition and replacement on carbon emissions and construction waste, exemplar initiatives to reuse any materials from the existing building shall be developed and agreed with the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study. c. If the use of low carbon steel (e.g. reused, high percentage of recycled content, or EAF) for the primary structure is not feasible, a detailed justification shall be submitted to the Local Planning Authority. To help mitigate the carbon impact of this change in specification, exemplar initiatives to reduce embodied carbon emissions associated

	with building structure, shall be developed and agreed with the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
50	**Post-construction whole-life cycle carbon emissions** Once the as-built design has been completed (upon commencement of RIBA Stage 6 the **post-construction Whole Life-Cycle Carbon (WLC) Assessment** (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the 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 three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
51	**Façade System** Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings. REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the e Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policies DE1.
52	**District Heating Network Connection**

	The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. If feasible, before the network comes into operation, a strategy shall be submitted to and approved in writing by the Local Planning Authority which includes relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
53	**Climate Change Resilience Sustainability Statement** Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, overheating, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. In The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
54	**Climate Change Resilience Measures – completion details** Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that

	the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
55	**BREEAM** A post construction BREEAM assessment for each of (a) office, (b) retail and (c) culture use, demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve a minimum 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
56	**Updated Biodiversity Net Gain** Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS4. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.
57	**Greening and Biodiversity** Prior to the relevant works, a detailed landscaping strategy describing the quality and maintenance of the proposed urban greening and biodiversity measures. During design development stage the strategy shall identify further opportunities to improve the greening and biodiversity contribution (at ground level and on buildings) with a set of enhancement measures to be agreed with the Local Planning Authority. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To ensure the development delivers the highest quality public realm with the highest feasible levels of greening and biodiversity and supports wellbeing, and climate resilience including minimising the urban heat island, and reducing heat stress and flood risk in line with the

	following policies in the Development Plan and draft Development Plans: London Plan policies GG2, G5 and G6, Local Plan policies DM15.5, DM 18.3 and DM19.2, emerging City Plan 2040 policies DE2, OS2, OS3 and OS4.
58	**Ecological Management Plan** Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring • detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided •Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.
59	**Post Construction UGF and BNG** Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.
60	**Energy Strategy** Prior to the commencement of development, excluding demolition, an **updated Energy Assessment** confirming the detailed design stage opportunities for operational carbon reduction from the building to futureproof the development for low carbon operation is required to be submitted to and approved in writing by the Local Planning Authority. These opportunities should include:

	a. Further exploration of passive measures to reduce cooling demand b. Further exploration of opportunities to incorporate/maximise green/low carbon technologies e.g. PV panels The development shall be carried out in accordance with the approved Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the development. REASON: To ensure that the development is sustainable and that operational greenhouse gas emissions have been minimised as far as possible including minimising both annual and peak energy demand and maximising opportunities for renewable energy, improving performance against the GLA target of a 35% emissions reduction over Part L. Also to ensure optimal climate resilience (overheating, heat stress, resource efficiency) including that the risk of overheating has been reduced as far as practical and that all passive measures have been explored in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG6, SI 2, SI 3 and SI 4 - Local Plan 2015 policies DM 15.2, 15.5 - emerging City Plan 2040 policy CR1.
61	**Positive Pump Device** Prior to first use of the building upon completion of development, the basement shall be fitted with a positively pumped device designed to remove sewer water from the building, which shall be maintained and functional at all times. REASON: To protect the building from sewer flooding, in accordance with the following policy: DM18.3.
	Design and Public Realm
62	**Maximum Heights** The maximum heights of the approved building shall be as follows: • To the uppermost point of the main Tower (lift overrun) - 253.5m AOD; • To the top of the main Tower – 240.5m AOD; • To the uppermost point of the Pavilion – 52.5m AOD. REASON: In the interests of visual amenity and heritage protection in accordance with the following policies of the Local Plan: CS10, DM10.1, CS12 and CS14.
63	**Design Details – Main Tower** Before any works thereby affected to the main tower are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

	(a) particulars and sample including colour and texture finishes of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, these should include 1:1 mock ups of the agreed areas including external ground and upper-level surfaces including jointing, texture and colour finish ; (b) typical bay details of the proposed typical elevations above level 3 including the elevation of the satellite service core. These should include 1:1 mock ups of the agreed areas to include jointing materials, texture and colour finish, as well as details of planters and soffits; (c) typical bay details of the lower levels from the ground floor to level 3, including 1:1 mock ups of the agreed areas, jointing, materials, colour, textures, finish and details of soffits; (d) details of colonnade columns and for all relevant levels including mock up samples the agreed areas at 1: 1 and interface detail in the public realm; (e) details of the external exoskeleton and related structural framing to the tower including typical samples at 1:1 (e) details of the recessed elevations and soffits from level 4 to level 53 including external terraces and internal wintergardens; (f) details of the servicing bay entrance, mock up samples and interface in the public realm; (g) mock up sample of the glazing system to test solar glare; (h) details of the rooftop including plant equipment and other infrastructure; (i) details of all soffits, handrails and balustrades, including samples of all glass balustrades on external terraces, including reflectivity experience from ground and high levels and iron content; (j) details of all ground floor elevations up to Level 04 the base including entrances and southern core, including junctions with soffits; (k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences on external terraces and roof level including within the plant rooms; (l) details of all drainage, irrigation and rainwater harvesting; (m) details of the integration of M&E and building services into the external envelope; (n) details of all wind mitigation measures, including location and detailed design; (o) details of the escalators and entrances into the office lobby; (p) details of all proposed entrances including lifts; (q) details of signage, including building identifiers; and (r) full details of the of the ground floor public spaces, including flooring, entrances, fenestration, planters, seating, lighting, soffits, drainage, irrigation, market stalls and any infrastructure required to enable delivery of programmed and varied use. (s) final details of the design of the ground floor recess to the south core including the fire control centre and long stay cycle entrance and provision for adequate safety measures

	REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.7.
64	**Design Details – Pavilion Building** Before any works thereby affected to the pavilion building are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) particulars and sample including colour and texture finishes of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces including jointing and any necessary expansion/movement joints; (b) typical bay details of the proposed typical elevations. These should include a 1:1 mock up of agreed areas, jointing of materials and colour finish, as well as details of any soffits; (c) typical bay details of the elevation of the buildings foyer, including entrances, jointing materials, colour finish and details of any soffits; (d) final details of the metal veil artwork including mock ups at a scale of 1:1 of agreed areas (e) details of the vertical climber planter and its integration into the façade; (f) details of the servicing bay entrance, mock up samples and interface in the public realm and where the pavilion meets the ramp; (g) details of signage; (h) details of the rooftop including plant equipment and other infrastructure; (i) details of the integration of window cleaning methodology and equipment and the garaging thereof, plant, flues, and other excrescences on external terraces and roof level including within the plant rooms; (j) details of all drainage, irrigation and rainwater harvesting; and (k) details of the integration of M&E and building services into the external envelope. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.7.
65	**Design Details – Cycle Hub** Before any works thereby affected to the cycle hub are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) particulars and sample including colour and texture finishes of the materials to be used on all external and semi-external faces of the

	building and surface treatments in areas where the public would have access, including external ground and upper-level surfaces including jointing and any necessary expansion/movement joints; (b) typical bay details of the proposed typical elevations. These should include a mock up at 1:1 of agreed areas, jointing materials and colour finish, as well as details of any soffits; (c) typical bay details of the buildings base, including entrances, jointing materials, colour finish and details of any soffits; (d) final details and samples of the metal screen panelling system including jointing; (e) details of signage; (f) details of the rooftop; (g) details of all drainage, irrigation and rainwater harvesting; and (h) details of the integration of M&E and building services into the external envelope. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.7.
66	**Mock-up Sample Panels agreed sections** Before the works thereby affected are begun the following details shall be agreed: (1) the sections of the facades and soffits of the proposed buildings for mock up panels at a scale of 1:1; and (2) the location to view the panels in person. This shall be approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM 10.1.
67	**Balustrades and Suicide Prevention** Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for all 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. 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, DM 10.1, DM10.3 and CoL Suicide Prevention Planning Advice Note.

68	**Details – Market Hall and Colonnades** 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: Details of all internal public market hall spaces in the main building, including general arrangement elevations, treatment of the soft core, soffits, layout, samples of materials and lighting and interface details with the public realm where relevant. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10 and DM10.1
69	**Landscaping Details** Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) full details of the of the public spaces, including flooring, street furniture, boundary treatments, seating, lighting, soffits, bollards, cycle storage, (b) particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access; (c) details of handrails and balustrades and staircases and steps; (d) details and locations of the drinking fountains in public areas. (e) details of all drainage, irrigation and rainwater harvesting; (g) details of bollards and integrated HVM; and (h) details of gradients and levels. 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, CS10, DM10.1, DM10.4, DM10.8.
70	**Urban Greening Details** Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for (a) planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; (b) the incorporation of green roofs into roof surfaces including the Open Gate Pavillion building and the cycle store building; (c) the landscaping of the public realm; and (d) vertical greening walls.

	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 and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
71	**Landscaping Scheme** All landscaping, including the ground floor, external terraces and winter gardens, shall be treated in accordance with a landscaping scheme, including details of: (a) Irrigation; (b) Provision for harvesting rainwater run-off from road to supplement irrigation; (c) Spot heights for ground levels around planting pit; (d) Soil; (e) Planting pit size and construction; (f) Tree protection guards; and (g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. To be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
72	**Lighting Strategy** Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: (a) lighting layout/s; (b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits);

	(c) a lighting control methodology; (d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; (e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; (f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; and (g) details of aviation lights including locations. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and DM15.7 and City of London Lighting Strategy SPD.
73	**Street Lighting** Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details and comply with the adopted Lighting Strategy SPD. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1, and DM15.7
74	**Wind Mitigation** No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind

	mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority. REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
75	**Signage Strategy** Prior to occupation of the relevant building, the following details relating to wayfinding and signage strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall address the following: (a) Key access points for the (i) office, (ii) Pavilion, (iii) cycle hub; (b) Key access points for the publicly accessible spaces and facilities; (c) Cycle parking; and (d) Servicing and Delivery. Each of the above must highlight accessible routes. All signage placed on the development site shall be in accordance with the approved strategy and shall be installed prior to occupation of each relevant use and retained as such for the life of the uses. 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: DM 10.1, DM10.5, DM10.6, DM10.8, and DM15.7.
	Accessibility
76	**Inclusion and accessibility** Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) entrance to accessible parking including siting of controlled entry system at a scale of no less than 1:20 (b) all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate (c) security measures including provision of wider aisle gates at all controlled points of entry (d) Planting to all public landscape areas including path widths and seating

	(e) An inclusive entrances strategy including details of doors, opening mechanisms, surface contrast and any control points (f) Public Realm at grade details including: recesses in seating for wheelchair users and buggies and assistance animals; seating at a range of heights; seating should allow for wheelchair users to transfer; back rest and arm rests for support when rising; and single and group seating. (g) Lifts showing internal fit out, size, capacity and that they can accommodate people using larger motorised wheelchairs and Class C mobility scooters and stair access. (h) Horizontal movement through the building demonstrating that there is sufficient space for wheelchair users to pass, rest points, colour contrast of 30 LRV and clear wayfinding through the building. (i) Inclusive Toilet Strategy including details of the fit-out of the Changing Places, facilities, wheelchair accessible, ambulant accessible and larger toilets, single sex toilets, and baby changing facilities. 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.
77	**Access Management Plan** Prior to occupation, an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved, which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for: 1) Website information including photos and an easy read version with information on: a) Travel distances from key points of arrival and rest points b) Location of dropped kerbs c) Facilities available on-site including dimensions and photos for (as appropriate): i) Entrance to accessible parking and details of how to reserve spaces ii) entrances, lift access and queues and how these will be managed iii) controlled entry points (showing wider gates) iv) accessible toilets including access to keys for operation including at ground floor v) Changing Places toilets provision including but not exclusively at ground floor and for the other publicly accessible areas vi) Baby changing facilities including at ground floor and for the other publicly accessible areas vii) ‘universal’, female and male toilet provision at ground floor and for the other publicly accessible areas viii) facilities for assistance animals

	ix) equipment loan x) assistive listening system and other assistive technology xi) rest and recovery facilities xii) room for reflection/quiet room xiii) culture space 2) Booking information for Pavilion Building including arrangements for: i) Alternatives to online booking ii) queuing e.g. for people who are not able to stand for periods iii) security iv) essential companions v) assistance animals vi) places for rest and recovery 3) Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering. 4) Inclusive Entrances Strategy The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. 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.
Highways and Transportation	
78	**LUL Infrastructure Protection** Before the demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) provide details of demolition including design and Risk Assessment Method Statement (RAMS); b) provide details of associated temporary works including design and RAMS; c) identify and accommodate existing London Underground structures in the vicinity of the proposed development; d) provide details of changes in loading to LU's infrastructure considering sequence of works; e) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long-term changes in loading for the demolition stage; f) mitigate the effects of noise and vibration on and arising from adjoining railway operations. g) provide technical specifications related to the proposed plant. Upon review of the technical specifications, an independent EMC impact

	assessment may be required to be submitted for TfL Engineers' approvals. The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. REASON: To ensure any EMC issues emanating from the plant or equipment to be used on the site or in the finished structure will not adversely affect London Underground electrical equipment or signalling systems and to ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
79	**LUL – Infrastructure Protection** Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) provide details of demolition, excavation and associated temporary works including design and RAMS; b) provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent) including design and RAMS; c) provide details of changes in loading to LU's infrastructure considering sequence of works; d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the sub-structure construction stage; e) mitigate the effects of noise and vibration on and arising from the adjoining railway operations – an assessment in relation to the basement excavation should be provided in accordance with the London Plan 2021 Policy D10. The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

	REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
80	**LUL - Infrastructure Protection** Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) provide details of super-structure including design and RAMS; b) provide details of associated temporary works including design and RAMS; c) provide details of changes in loading to LU's infrastructure considering sequence of works; d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and permanent changes in loading for the super-structure construction stage; e) mitigate the effects of noise and vibration on and arising from the adjoining railway operations – an assessment of the effects from groundborne noise and vibration to the occupants of the building should be provided. The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
81	**Restricting numbers of deliveries/servicing** There shall be no more than 96 delivery and servicing motorized vehicles daily trips in total over any 24-hour period (accounting for a consolidation rate of at least 50%) excluding fresh produce delivery and construction fitout. 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.
82	**Restricting Hours of deliveries and servicing**

	No deliveries and servicing trips to the premises shall be carried out between the hours of 7:00 to 10:00, 12:00 to 14:00 and 16:00-19:00, Monday to Sunday, including Bank Holidays. 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, DM 16.1, DM21.3
83	**Site Condition Survey** 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. REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 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.
84	**Demolition Logistics and Management Plan** Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition 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. The details shall be completed in accordance with the latest guidance, 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. No demolition shall be carried out other than in accordance with the approved details and methods. The Demolition Management Plan to include: • Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the demolition phase should be captured within the overarching DLP document; this will ensure that a Principal

	Contractor is appointed early and prior to any demolition commencing. • Deconstruction vehicle routes to and from the site to be approved with CoL Highways • 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). • Deconstruction 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. • encouraging the use of cargo bike deliveries throughout the deconstruction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout deconstruction will be required. • 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: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.
85	**Construction Logistics and Management Plan** Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the 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. The details shall be completed in accordance with the latest guidance, 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. No construction shall be carried out other than in accordance with the approved details and methods. The Construction Management Plan to include: • Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the construction phase should be captured within the overarching CLP document; this will ensure that a Principal

	Contractor is appointed early and prior to any construction commencing. • Construction vehicle routes to and from the site to be approved with CoL Highways • 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). • 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. • Encouraging the use of cargo bike deliveries throughout the construction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required. • 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: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
86	**Changing Facilities and Showers** Notwithstanding the details shown on the approved drawings, details of the changing facilities, showers and lockers shall be submitted and approved by the Local Planning Authority. The areas shall be implemented and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.3.
87	**Travel Plan** An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the

	approved Travel Plan for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: CS16, DM16.1.
88	**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 excluding demolition 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. 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.
89	**City Market takeaway** Before the use of the City Market as authorised by this permission is commenced, adequate provision must be made within the curtilage of the site for loading and unloading facilities for takeaway and food delivery drivers and details of such facilities must be submitted to and approved in writing by the Local Planning Authority. The approved facilities must be maintained and used as approved for the life of the building. REASON: To ensure that traffic in surrounding streets is not impeded and a free flow of traffic is maintained in accordance with the following policy of the Local Plan: DM16.5.
90	**Paving and drainage** Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed. REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.

91	**Cycle Parking** Details of the cycle parking spaces, types and locations shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. These shall comprise of long stay cycle parking of 1600 spaces and short stay cycle parking of 144 spaces unless otherwise agreed in writing. 5% of cycle parking spaces to be provided for larger accessible cycles/adapted cycles, and suitable cycle lifts and other associated facilities provided. The cyclist facilities shall thereafter be retained and operated in accordance with the approved details for the life of the building. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1, DM 16.3.
Fire	
92	**Fire Safety** The development shall be carried out in accordance with the approved details within the Fire Statement prepared by OFR Consultants and dated April 2024. REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.
Land Use	
93	**Uses** The development shall provide (all figures GIA excluding plant): • Office (Class E(g)(i)) – 99,005sq.m • Retail/Food and Beverage (City Market) (Class E (a/b)) – 1237sq.m • Pavilion Building – Total 2410sq.m - Glass Gallery and Mezzanine (F1(a/b/c)/Sui Generis) – 313sq.m - Hall (Class F1(a), F1(b) and F1(e) – 369sq.m - Creative Workspace (Class E(g)(i)/(ii)) – 582sq.m • Public Cycle Hub (Sui Generis) – 648sq.m REASON: To ensure the development is carried out in accordance with the approved plans.

94	**Offices** The areas within the development marked as Office (Class E(g)(i)) on the floorplans hereby approved, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020). 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, and in accordance with policy CS1 of the Local Plan 2015.
95	**City Market** The areas within the development marked as City Market on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant) and Sui Generis (drinking establishment) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure 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, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.
96	**Pavilion** The areas within the Pavilion Building on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. • Glass Gallery and Mezzanine - F1(a), F1(b), F1(c) and sui generis • Hall - Class F1(a), F1(b) and F1(e) • Creative Workspace - (Class E(g)(i)/(ii))

	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, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11.
97	**Cycle Hub** The areas within the development marked as Cycle Hub (Sui Generis) on the floorplans hereby approved, shall be used for those purposes and for no other purpose and must remain ancillary to the primary office function of the Site. REASON: To ensure that the public benefits of the cycle hub are provided and retained in accordance with Local Plan Policy DM16.3.
	Other
98	**Deconstruction Method Statement – St Ethelburga's** No demolition works shall commence on site until a detailed deconstruction method statement has been submitted to and approved in writing by the Local Planning Authority, which includes details to show the methods of structural monitoring and preservation of historic building features and fabric to St Ethelburga's Centre for Reconciliation and Peace at 78 Bishopsgate. The development shall be deconstructed in accordance with the statement as approved. Should any repairs be required, these should be undertaken by the developer in consultation with both the Local Planning Authority and St Ethelburga's taking into consideration any relevant listed building legislation. REASON: To ensure the preservation of historic building features and fabric of adjoining designated assets in accordance with the following policies of the Local Plan: CS 12, DM 12.1.
99	**Construction Method Statement – St Ethelburga's** No construction works shall commence on site until a detailed construction method statement has been submitted to and approved in writing by the Local Planning Authority, which includes details to show the methods of structural monitoring and preservation of historic building features and fabric to St Ethelburga's Centre for Reconciliation and Peace at 78 Bishopsgate. The development shall be constructed in accordance with the statement as approved. Should any repairs be required, these should be undertaken by the developer in consultation with both the Local Planning

	Authority and St Ethelburga's taking into consideration any relevant listed building legislation. REASON: To ensure the preservation of historic building features and fabric of adjoining designated assets in accordance with the following policies of the Local Plan: CS 12, DM 12.1.
100	**Tree protection during construction** Fencing for the protection of any retained tree, including the Ginkgo Biloba tree to Bishopsgate, including the roots shall be installed in accordance with plans and particulars to be submitted to and approved in writing by the Local Planning Authority and shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the Local Planning Authority. REASON: In order to protect the trees during building operations in accordance with the following policies of the Local Plan: DM10.4, DM19.2.
101	**Public Art** 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: Details of the protection of the temporary installation of the 'Sculpture in the City' art piece to the corner of the Site on Bishopsgate Junction (Richard Markness "Temple") during deconstruction and construction to enable continued public appreciation, if the sculpture is still in situ at the time of commencement. REASON: In the interest of visual amenity and to maintain the artistic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2.

Informatives	
1	(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.
2	(Consultations) Consultation and engagement with the local community should be undertaken where relevant as submissions to discharge conditions are developed in line with the expectations set out in the City's Developer Engagement Guidance (May 2023).
3	(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).

	Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.
4	(NATS) For the purpose of conditions 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.
5	(Environment Agency) Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures in all developments, particularly in those that are new. 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 all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants. We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. ‘major’ developments) should achieve the BREEAM ‘excellent’ standard for water consumption (category ‘WAT 01’), or equivalent.
6	(LCY)

	As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London 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'.
7	(LCY) 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
8	(LCY) Given the heights of the cranes to be estimated to be over 250m AGL, the crane operator is required to submit all crane details such as maximum height, operating radius, name and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system. For notification, please follow the link via CAA website: Crane notification | Civil Aviation Authority (caa.co.uk). Once crane notification has been received from the CAA, London City Airport safeguarding team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued. Specific CAA guidance for crane lighting/marking is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking (caa.co.uk).
9	(GLAAS) An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.
10	(GLAAS)

	Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.
11	(Highways) You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980.
12	(Thames Water) There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CAmy.Williams%40cityoflondon.gov.uk%7C8dcf6e4b4a664b8786ac08dce20327fa%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638633750388244589%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=VK2hOtJRt57uL1TH7k%2FfnAG5OmRSZWN0DU%2FbmFeMRU4%3D&reserved=0
13	(Thames Water) A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CAmy.Williams%40cityofl

	ondon.gov.uk%7C8dcf6e4b4a664b8786ac08dce20327fa%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638633750388257570%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=kKUl0I7zNWfGDw7xWpEC9RzgbvQULSDCztbWLKekas0%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.
14	(Thames Water) 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.
15	(Thames Water) As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CAmy.Williams%40cityoflondon.gov.uk%7C8dcf6e4b4a664b8786ac08dce20327fa%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638633750388269058%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=t%2F4POyfTPSebAzsSNbc1wZQBXNF4qqMkV6EKudFYIBg%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.
16	(Thames Water) With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to

	a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CAmy.Williams%40cityoflondon.gov.uk%7C8dcf6e4b4a664b8786ac08dce20327fa%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638633750388280624%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=WtFpjBDQjgr5eZ%2F7rmK138ah7QYBbgkAz7MkWAYjg5g%3D&reserved=0
17	(Thames Water) 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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CAmy.Williams%40cityoflondon.gov.uk%7C8dcf6e4b4a664b8786ac08dce20327fa%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638633750388229296%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=N0jwMIM3bed6G2pq3fNwekiebwcFGI7bPEgpDps7ZY8%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.
18	(Thames Water) There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CAmy.Williams%40cityoflondon.gov.uk%7C8dcf6e4b4a664b8786ac08dce20327fa%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638633750388292373%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=NJHmKpEnliKlVajWgK8lpKEEZUK3oh%2FXHBgAJOltpb4%3D&reserved=0

19	(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.
20	(Heathrow) Any proposed buildings exceeding 45m AGL will be required to install obstacle lights, medium intensity type A, B or C. refer to **Book 1 chapter Q - CS ADR-DSN.Q.848.**
21	(Air Quality) 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.
22	(Air Quality) 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.
23	(Air Quality) 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)
24	Electric Vehicle charging facilities should be provided for the blue badge parking space.

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

26	The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters: (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required. (b) Installation of engine generators using fuel oil. (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed. (d) Alterations to the drainage and sanitary arrangements. (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular: - the identification, encapsulation and removal of asbestos in accordance with a planned programme; - provision for window cleaning (internal and external) to be carried out safely. (f) The use of premises for the storage, handling, preparation or sale of food. (g) Use of the premises for public entertainment. (h) Approvals relating to the storage and collection of wastes. (i) The detailed layout of public conveniences. (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance. (k) The control of noise from plant and equipment; (l) Methods of odour control.
27	The Director of Markets and Consumer Protection (Environmental Health Team) advises that: Noise and Dust (a)

	The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations. (b) Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department. (c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act l974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act l990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations. (d) Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution. Air Quality (e) Compliance with the Clean Air Act 1993 Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant. Boilers and CHP plant

	(f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NOx emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015. (g) All gas Combined Heat and Power plant should be low NOX technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015. (h) When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air. (i) Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology. Standby Generators (j) Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection. (k) There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this. Cooling Towers (l) Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems. Noise Affecting Residential Properties

(m)
The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed to benefit from the sound insulation provided. This may need additional planning permission.

(n)
The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping, deliveries, ventilation plant and refuse collection activities that go on through the night. The units need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

Ventilation of Sewer Gases

(o)
The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)
Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)
If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

	Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance; The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building; Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation; Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours. (r) From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: www.smokefreeengland.co.uk.
28	You are advised to contact the Markets and Consumer Protection Department who will advise in respect of Food Hygiene and Safety, Health and Safety at Work, Environmental Impact and any other matters relevant to that department. Should the Markets and Consumer Protection Department require any external design alterations you should advise the Planning Department which will advise as to whether planning permission will be required for such works.
29	You are requested to notify the Chief Planning Officer on commencement of the development in order that the works can be inspected and monitored.
30	The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
31	This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
32	This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.

33	This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained.
34	Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
35	Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
36	During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e. - to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services; - aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend; - or where the procurement of goods and services is contracted out - ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our `Guidance note for developers').  For additional details please refer to the City of London's `Local Procurement Charter' and `Local Procurement - Guidance Note for City Developers'. These documents can be found at  http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning  Further guidance can be obtained by contacting the `City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

	To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk
37	The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
38	The landowners, managing operators and tenants are required to adhere to the actions of the Considerate Lighting Charter as set in the City of London Appendix A of the City of London Lighting Supplementary Planning Document 17/11/2022
39	The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive: (a) Fire precautions and certification: London Fire Brigade, Fire Prevention Branch 5-6 City Forum City Road London EC1N 2NY (b) Public houses, wine bars, etc. City of London Corporation Trading Standards and Veterinary Service PO Box 270 Guildhall London EC2P 2EJ
40	The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.
41	Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy. Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.
42	All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating for the office elements of the scheme and The City of London Corporation as Planning Authority requests early discussion with

	the Applicant should it appear that the rating is likely to fall below outstanding.
43	The current design team or an equivalent team in quality and experience shall be retained for the construction and completion stage of the development to meet London Plan D4 (F) part 4, as required by S106 obligation.

From: [redacted]
To:
Subject: RE: Planning Application Consultation: 24/00836/FULEIA
Date: 09 September 2024 17:24:01

Afternoon Amy,

Reviewing the utility report, all is satisfactory for 99 Bishopsgate.

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: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, September 9, 2024 2:52 PM
To: Thevathas, Sye <[redacted]>
Subject: Planning Application Consultation: 24/00836/FULEIA

Dear Sir/Madam

Please see attached consultation for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

From: PlanningGatewayOne
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00836/FULEIA (Our ref pgo-5851)
Date: 10 September 2024 09:43:50
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-5851) 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

50 YEARS HSE

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, September 9, 2024 2:49 PM
To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Subject: Planning Application Consultation: 24/00836/FULEIA

Dear Sir/Madam

Please see attached consultation for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London
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Amy Williams - Case Officer
Development Division
Environment Department
City of London

NATS Safeguarding Office
4000 Parkway
Whiteley
Fareham PO15 7FL

T: [redacted]
E:
W: www.nats.aero/windfarms

NATS / CRM Ref: SG36305

11th September 2024

Sent via email: [redacted]
cc:

Dear Ms Williams,

24/00836/FULEIA - 99 Bishopsgate London EC2M 3XD

I refer to the application quoted above. NATS has assessed the application and has identified the significant potential for an impact on its operations. Specifically, the proposed development is of a significant scale and massing, as well as being offset from the bulk of the City Cluster. As such, the line of sight from the development to the H10 radar, operated by NATS but located at Heathrow airport is unobstructed above 120m.

NATS therefore anticipates the top half of the building to be sufficiently illuminated by the radar to reflect radar signals and cause false aircraft targets to appear on air traffic controllers' displays. This has an unacceptable impact on ATC workload.

The potential impact can be affected by the design of the building (finish, massing/scale, orientation) or in the worst case can be mitigated by modifying the radar system. As such, NATS is satisfied that subject to a commercial agreement with the applicant in respect of timescales and funding, mitigation measures are available.

Accordingly, should the LPA be minded to grant planning permission to the development, NATS respectfully requests that the planning conditions overleaf are imposed on any consent.

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002 prior to granting any permission.

Yours faithfully

[redacted]

Mr Sacha Rossi
For and on behalf of NATS En-Route plc

Aviation Planning 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 120m 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.

-----Original Message-----
From: Russell Pengelly
Sent: Monday, September 9, 2024 3:28 PM
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00836/FULEIA

Dear Amy,

I have reviewed the plans of the build at length with QCIC, who were the main security consultants on the project.

Whilst I have no objection to the build/refurb, I have raised concerns over the public/private walkway between Wormwood Street and Bishopsgate. The building integrates the cycle storage facilities into the back aera of the building and have allocated space for them over several floors. My concern is that this area is likely to become a through route for cyclists avoiding the busy junction of Bishopsgate, also the location of the storage access is along the back corridor.

I have recommended that some of this area should be stepped to minimise this, subject to appropriate DDA access.

We have discussed controlling access to the building during spontaneous protest/attack and they have placed mitigation into the design for this.

Best wishes

Russell

PC Russell Pengelly
Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor Partnerships and Prevention Hub

City of London Police |Bishopsgate Police
Station|182 Bishopsgate, London, EC2M 4NP

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, September 9, 2024 2:50 PM
To: Doco
Subject: Planning Application Consultation: 24/00836/FULEIA

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Dear Sir/Madam

Please see attached consultation for 99 Bishopsgate London EC2M 3XD
Reply with your comments to: HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London
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##

creating a better place
for people and wildlife

Environment Agency

Amy Williams
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137426/01
Your ref: 24/00836/FULEIA

Date: 12 September 2024

Dear Amy,

99 Bishopsgate, London, EC2M 3XD.

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Thank you for consulting us on the above application on 9 September 2024.

Environment Agency Position
Based on the information currently available, the development raises no environmental concerns for us. We therefore have **no comments** on the Environmental Statement.

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. 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 all considered as an integral part of new developments and/or

refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

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 HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

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.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Isabel Smith
Planning Advisor

Email: HNLSustainablePlaces@environment-agency.gov.uk
Direct Dial: 020 7714 2206

From: Active Travel England Planning
To: PLN - Comments
Subject: LPA Reference: 24/00836/FULEIA Standing Advice Response
Date: 17 September 2024 11:43:44

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00836/FULEIA

ATE Reference: ATE/24/01069/FULL

Site Address: 99 BISHOPSGATE, LONDON, EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing

advice can be found here:
https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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[ref:a0zTw000000r8U5IAI;d510699c560d5cf25a65147f36c935c1:ref]

LPA Ref: 24/00836/FULEIA

London City Airport Ref: 2024/LCY/211

Date: 18/09/2024

Dear Amy Williams,

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.

LPA Reference	24/00836/FULEIA
Proposal	Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

	This application is accompanied by an Environmental Statement which is available for inspection with the planning application.
Location	99 Bishopsgate London EC2M 3XD
Borough	City of London
Case Officer	Amy Williams

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Radar Conditions

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.

No construction work shall be carried out above 120m 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.

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.

Instrument Flight Procedures (IFPs) Impact Condition

No construction works above ground level shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. The IFP assessment must consider all tall buildings and proposed construction cranage.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.

Construction Methodology Condition

No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport.

Reason: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.

Building Obstacle Lighting Condition

Details of these obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.
Obstacle Lighting can be installed on the western edge of the roof. This is to ensure the western edge of the building cluster is marked sufficiently.

Reason: Aviation 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 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

Crane advice:

Given the heights of the cranes to be estimated to be over 250m AGL, the crane operator is required to submit all crane details such as maximum height, operating radius, name and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system.

For notification, please follow the link via CAA website:
Crane notification | Civil Aviation Authority (caa.co.uk)

Once crane notification has been received from the CAA, London City Airport safeguarding team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.

Specific CAA guidance for crane lighting/marking is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking (caa.co.uk)

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

From: lauren underwood
To: PLN - Comments
Subject: Our DTS Ref: 75721 Your Ref: 24/00836/FULEIA
Date: 20 September 2024 14:52:59

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 75721 Your Ref: 24/00836/FULEIA 20 September 2024

Dear Sir/Madam

Re: 99, BISHOPSGATE, LONDON, GREATER LONDON AUTHORITY, EC2M 3XD

Waste Comments
The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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

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

Thames Water is currently working with the developer of application 24/00836/FULEIA to identify and deliver the off site COMBINED WASTE WATER infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the combined waste water network to serve 17,800 sqm of office space but beyond that, upgrades to the combined waste water network will be required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. "There shall be no occupation beyond 17,800 sqm of office space until confirmation has been provided that either:- 1. All combined waste water network upgrades required to accommodate the additional flows from the development have been completed; or 2. A development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to 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. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

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

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

Visit us online www.thameswater.co.uk , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

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Planning and Place
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place
Amanda Reid

THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

City of London
Environment Department
PO Box 270 Guildhall
LONDON
EC2P 2EJ

Date: 20/09/2024
My Ref: OB/24/06001

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

99 Bishopsgate, LONDON, EC2M 3XD

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

SCHEDULE

Development:	This Council is asked for its observations on an application submitted to the City of London for: Partial demolition of the existing building,retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118
Site Address:	**99 Bishopsgate, LONDON, EC2M 3XD**
RBKC Drawing Nos:	OB/24/06001

Applicant's Drawing Nos:

Application Dated: 09/09/2024

Application Completed: 09/09/2024

FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S) ATTACHED OVERLEAF

CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION

INFORMATIVE(S)

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see Advice for Builders on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at **http://www.rbkc.gov.uk/OB/24/06001 .** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid
Director of Planning and Place

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/292972 **.** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

Amy Williams
Environment Department
City of London
PO Box 270, Guildhall
London EC2P 2EJ

25 September 2024

Dear Amy

Re: Planning Application No: 24/00836/FULEIA – Partial demolition & construction of a 53 storey mixed use building at 253.5m AOD, with associated works at 99, Bishopsgate, London EC2M 3XD

Our Ref: LGW5631

Thank you for your letter/email dated 09 September 2024, regarding the above-mentioned consultation.

The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria for London Gatwick. We therefore have no objections.

This response relates to London Gatwick only, other airports will have different requirements.

For information, please note that the DfT Circular 'Town & Country Planning (safeguarded aerodromes, technical sites & Military Explosives Storage Areas) Direction 2002, under Annexe 2 'High Structures', requires that Local Planning Authorities notify CAA of any building or works extending 91.4m or more above ground level as soon as permission has been granted. Please notify CAA at arops@caa.co.uk

For details of the information to be submitted please refer to the circular at The town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 - GOV.UK (www.gov.uk)

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer
For and on behalf of London Gatwick

Email: gal.safeguarding@gatwickairport.com

Historic England

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00836/FULEIA
Our Ref: 223801

Contact: Helen Hawkins
[redacted]

26 September 2024

Dear Ms Williams,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

99 Bishopsgate London EC2M 3XD
Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Recommend Archaeological Condition

Thank you for your consultation received on 09 September 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

The planning application is accompanied by an Environmental Statement which contains an archaeological chapter and archaeological baseline report by MOLA. The archaeological baseline demonstrates that, despite the site being located within the Roman and medieval city walls, archaeological remains over the majority of the site will have been removed by the current basement. The baseline highlights that archaeological survival is likely to be limited to three areas: in the north-east of the site under the current mezzanine, the extreme west of the site next to Wormwood Street and the access ramp in the south. It is therefore recommended that archaeological evaluation takes place in these three areas early in the development programme to establish the extent of archaeological survival on the site and allow a mitigation programme to be designed and programmed in.

GLAAS requested within the scoping response that public benefit relating to archaeology be included in the Cultural Plan for the site. It is therefore very welcome to see that the applicant has worked with the London Museum to provide publically accessible display spaces for archaeological finds within the ground floor space, and these should be taken forward in the final development.

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.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition

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

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

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater

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Correspondence or information which you send us may therefore become publicly available.

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:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
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HistoricEngland.org.uk
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Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Date: 26 September 2024
Our ref: 487934
Your ref: 24/00836/FULEIA

City of London

BY EMAIL ONLY
PLNComments@cityoflondon.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
Location: : 99 Bishopsgate London EC2M 3XD

Thank you for your consultation on the above dated 09 September 2024 which was received by Natural England on 09 September 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 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.

Yours faithfully

Helen Churchill
Consultations Team

Annex A –Natural England general advice

Protected Landscapes
Paragraph 182 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty
Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites
Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk).

Protected Species
Natural England has produced Protected species and development: advice for local planning authorities (gov.uk) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A –Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply - GOV.UK (www.gov.uk) for more information.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England - GOV.UK (www.gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. Major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

For further information on the timetable for mandatory biodiversity net gain, we refer you to Biodiversity Net Gain moves step closer with timetable set out - GOV.UK (www.gov.uk). Biodiversity net gain - GOV.UK (www.gov.uk) provides more information on biodiversity net gain and includes a link to the draft Biodiversity net gain - GOV.UK (www.gov.uk) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric - GOV.UK (www.gov.uk) for more information. For small development sites, The Small Sites Metric - JP040 (naturalengland.org.uk) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Annex A –Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A –Natural England general advice

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 104 and 180 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

Heathrow Airport Limited
Airside Operations Facility
Heathrow Airport
Hounslow, Middlesex TW6 2GW
Tel: +44(0) 208 757 0887
Email: Safeguarding@Heathrow.com

Amy Williams
Development Division
City of London
By email

27/09/24

Dear Amy,

Re: Planning Reference: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Location: 99 Bishopsgate London EC2M 3XD.

Our Ref: LHR6013

We refer to your email dated 09/09/24, 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 conditions detailed below:

H10 Radar Mitigation Condition
No Development can take place until:

- mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar at Heathrow Airport.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.

Submission of a Construction Management Strategy
Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters:

- details of cranes and other tall construction equipment (including the details of obstacle lighting) – Such schemes shall comply with Advice Note 4 'Cranes' (available at http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf*).*

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not breach the Safeguarding Surfaces surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

CAA Building Notification
If any part of the 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'.

Building Obstacle Lighting
Any proposed buildings exceeding 45m AGL will be required to install obstacle lights, medium intensity type A, B or C. refer to **Book 1 chapter Q - CS ADR-DSN.Q.848**

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:	Location Enquiries
To:	PLN - Comments
Subject:	RE: Planning Application Consultation: 24/00836/FULEIA
Date:	27 September 2024 11:05:44
Attachments:	image001.png image002.png

THIS IS AN EXTERNAL EMAIL

Good morning,

Application No: 24/00836/FULEIA
Site address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- our right of support is not compromised;
- the development will not have any detrimental effect on our structures either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
a) provide details of demolition including design and Risk Assessment Method Statement (RAMS);
b) provide details of associated temporary works including design and RAMS;
c) identify and accommodate existing London Underground structures in the vicinity of the proposed development;
d) provide details of changes in loading to LU's infrastructure considering sequence of works;
e) provide an assessment of ground movement impact on London Underground structures and

tunnels due to temporary and potential long term changes in loading for the demolition stage;
f) mitigate the effects of noise and vibration on and arising from adjoining railway operations.
g) provide technical specifications related to the proposed plant. Upon review of the technical specifications, an independent EMC impact assessment may be required to be submitted for TfL Engineers' approvals. This is to ensure any EMC issues emanating from the plant or equipment to be used on the site or in the finished structure will not adversely affect London Underground electrical equipment or signalling systems.

2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
a) provide details of demolition, excavation and associated temporary works including design and RAMS;
b) provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent) including design and RAMS;
c) provide details of changes in loading to LU's infrastructure considering sequence of works;
d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the sub-structure construction stage;
e) mitigate the effects of noise and vibration on and arising from the adjoining railway operations – an assessment in relation to the basement excavation should be provided in accordance with the London Plan 2021 Policy D10;
f) no claims to be made against TfL or London Underground by the Local Authority purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
a) provide details of super-structure including design and RAMS;
b) provide details of associated temporary works including design and RAMS;
c) provide details of changes in loading to LU's infrastructure considering sequence of works;
d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and permanent changes in loading for the super-structure construction stage;
e) mitigate the effects of noise and vibration on and arising from the adjoining railway operations – an assessment of the effects from groundborne noise and vibration to the occupants of the building should be provided.
f) no claims to be made against TfL or London Underground by the Local Authority purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

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

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

This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li
Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN





-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 09 September 2024 14:45
To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Subject: Planning Application Consultation: 24/00836/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London
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This message has been scanned for malware by Forcepoint. www.forcepoint.com

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0041

Date of issue of this decision: 27/09/2024

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0041 **Date of Issue of Decision:** 27/09/2024
Your Ref No.:

Applicant Ms Amy Williams City Planning
City of London

NO COMMENTS made in reference to your consultation on the following development:

Partial demolition of the existing building, retention and partial extension of existing
basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD)
building to provide commercial floorspace (Class E); with market hall space on the ground
floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b))
and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-
storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or
performance space, learning, community use, creative workspace (Class F1, Sui Generis and
Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm
improvement works, hard and soft landscaping, provision of basement cycle parking and
means of access, highway works and other works associated with the development of the Site.

At 99 Bishopsgate London EC2M 3XD

In accordance with your letter received on 9 September 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

DECISION NOTICE

LBS Registered Number: 24/OB/0041

Date of issue of this decision: 27/09/2024

www.southwark.gov.uk

Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

30 September 2024
Crossrail Ref: CRL-IP-3273

Dear Amy Williams,

24/00836/FULEIA : 99 Bishopsgate London EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5 storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 09 September 2024, requesting the views of 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

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN
……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

From:	Haringey Planning Services
To:	PLN - Comments
Subject:	No Objection - HGY/2024/2490 - 99 Bishopsgate, London, EC2M 3XD (Your Ref: 24/00836/FULEIA)
Date:	03 October 2024 14:17:08

THIS IS AN EXTERNAL EMAIL

Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) Order 2015

Application No:	HGY/2024/2490
Proposal:	Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. (Observations to City Of London - their planning reference 24/00836/FULEIA)
Site Address:	99 Bishopsgate, London, EC2M 3XD

Dear Sir/Madam,

I am writing to inform you that the Council has no objection to your application.

Thank you

Planning Service

[ref:a0iTu000000VHqzIAG;42b4710288789bcf330fdca816064199:ref]

Planning | Placemaking and Housing | Haringey Council
Alexandra House (5th Floor), 10 Station Road, London, N22 7TR
www.haringey.gov.uk/planning-and-building-control/planning

London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

7th October 2024

Applicant:
Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2024/02262/OBS**

Registered on: **10th September 2024**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

99 Bishopsgate London City Of London EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground
floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place
Department: Joanne Woodward



Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

Your Ref:
Our Ref: 24/02841/OBS

Lambeth

0000/01/0000/0000000/69975362
1619970/006195/001/001

Amy Williams
PO Box 270
Guildhall
London
EC2P 2EJ

8th October 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amy Williams

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS
I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 24/02841/OBS Date of Application: 10.09.2024 Date of Decision 08.10.2024

Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For:	Observations on a proposed development within the adjoining Borough of City of London with respect to partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the site at 99 Bishopsgate London EC2M 3XD.

Approved Plans

Cover Letter dated 9th September 2024

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

PEOBSZ

Conditions

1 The London Borough of Lambeth raises no comment to the proposal.

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 8th October 2024

Amy Williams
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

Application Number: PA/24/01558
Your ref: 24/00836/FULEIA

Enquiries to: Steven Heywood
Tel:
Email: [redacted]

10 October, 2024

Dear Amy Williams,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location 99 Bishopsgate, London, EC2M 3XD
Proposal Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above applciation. I would be grateful if you would take the observations set out about into consideration:-

1. A Scoping Opinion (CoL reference 23/01122/SCOP) for the Proposed Development was issued by the City of London Corporation on 8 March 2024. The City of London planning register states that LBTH were consulted on this application on 16 October

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

2023. However, there is no record that LBTH received this consultation, as it is not registered on LBTH's planning register. It is requested that CoL provide the consultation email, so that LBTH can review procedures accordingly.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. While 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, associated listed buildings and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given in the Heritage, Townscape and Visual Impact Assessment (HTVIA) of the Environmental Statement (ES).

The ES concludes that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Traffic and Transport, and Climate Change.

The following aspects and matters that could affect LBTH will result in significant adverse effects, however, none of the affected receptors are located within LBTH: Noise and Vibration, Daylight, Sunlight, Overshadowing and Light Pollution, and Wind Microclimate.

The HTVIA concludes a major significant adverse effect on View 6: Aldgate Square within LBTH during construction.

Two cumulative schemes in LBTH have been considered in the cumulative assessment, however there are additional schemes in LBTH which should be considered as follows:

- 1-10 Bishops Square (One Spitalfields) (PA/24/01198). Planning application submitted.
- Royal Mint Court (PA/24/01229). Planning application submitted.
- 101 Whitechapel (PA/24/00173). Planning application submitted.
- Trumans Brewery (PA/24/01451, PA/24/01475, PA/24/01439, PA/24/01450). Planning applications submitted.
- Ensign Street (PA/13/03068); Planning permission granted.
- London Dock (PA/19/00764 – noting the latest s73 application granted for the site, previous permission including PA/17/02112 and PA/14/02819, original hybrid permission PA/13/01276) and the associated reversed matters applications (Plot D – PA/18/00331; Plot E – PA/19/00766; Plot F – PA/19/01684; Plot G – PA/21/00716 & PA/22/02666); Planning permission granted.
- London Dock Blocks H & J (PA/23/02079); Resolution to grant planning permission.
- Bishopsgate Goodsyard (LBTH Reference PA14/02011; London Borough of Hackney Reference; Greater London Authority Reference: 2014/2425); Planning permission granted.
- Land bounded by Elder Street, Folgate Street, Blossom Street, Norton

Folgate, Shoreditch High Street and Commercial Street (PA/14/03548) (PA/14/03618) (PA/19/00773); Planning permission granted.
- Enterprise House, 21 Buckle Street (PA/16/03552); Planning permission granted at appeal.
- 55-56 Chamber Street (PA/19/02837); Planning permission granted.
- 34-40 White Church Lane and 29-31 Commercial Road (PA/15/02527, PA/21/02666). Planning permission granted. (PA/24/00644); Planning application submitted.

A HTVIA has been provided within Volume 2 of the ES. The townscape assessment has considered the effects on Spitalfields Townscape Character Area within LBTH and has concluded a minor neutral effect.

The following views within LBTH, or relevant to the assessment of effects on the Tower of London have been identified and considered in the assessment:

- View 5: Commercial Road – Minor Neutral Effect during construction and operation.
- View 7: Butler's Wharf (not within LBTH) – Minor Neutral Effect during construction and operation.
- View 8: LVMF 25A.3 Queen's Walk (not within LBTH) – Minor Neutral Effect during construction and operation.
- View 9: LVMF 10A.1 Tower Bridge – Minor Neutral Effect during construction and operation.
- View 10: Tower Bridge Approach – Minor Neutral Effect during construction and operation.
- View 11: Tower of London, South Wall – Minor Neutral Effect during construction and operation.
- View 12: Tower of London, Inner Ward – Minor Neutral Effect during construction and operation.
- View 13: Tower of London, Inner Curtain Wall, east of Deveraux Tower – Negligible Neutral Effect during construction and operation.

LBTH has noted that the Non-Technical Summary (NTS) inconsistently reports the significant effect on View 6: Aldgate Square during construction, whilst this is correctly reported in paragraph 161 of the NTS, it is not stated in Table 8. In addition, Table 8 and Paragraph 165 of the NTS, reports that during operation View 6: Aldgate Square would experience a moderate beneficial significant effect, which is incorrect. The NTS must be updated in this regard.

Additional model views have been rendered and provided as Appendix 1 of the HTVIA, and the following views are located within LBTH, or relevant to the assessment of effects on the Tower of London:

- View 1: Ali Altab Park
- View 2: Wentworth Street
- View 4: LVMF 25A.1 Queen's Walk (not within LBTH)
- View 5: LVMF 25A.2 Queen's Walk (not within LBTH)

- View 6: Tower Hill Scaffold

With the exception of view 6, it is considered that the other views should have been fully assessed within the ES given the visibility of the Proposed Development in these views.

The Zone of Theoretical Visibility (ZTV) provided as Appendix 3 of the HTVIA demonstrate the Proposed Development would likely to be visible across a wider area of LBTH than is represented by the view point assessed, particularly within Allen Gardens. It is not clear from the ZTV whether the Proposed Development would be visible from LBTH Borough Designated View 2 View from Wapping Wall bridge to St Paul's Church (as shown on Figure 6 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020).

The date the photo of each view was taken cannot be located in the HTVIA. This should be provided to ensure the baseline is reasonably up to date and can be relied upon.

The TBHVIA assesses the likely significant effects of the Proposed Development on above-ground heritage assets. The following heritage assets within LBTH have been assessed:

- Tower of London World Heritage Site (WHS) and associated designations – Minor neutral effect during construction and operation.
- Christ Church – Negligible neutral during construction and operation.

It should be noted that the assessments within the THVIA are subjective. The 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.

The City of London Corporation must consider whether the ES is considered to be adequate 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 Regulations.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,

[redacted]

Sripriya Sudhakar, Director Planning and Building Control

Place Division / Development Management
Web: www.richmond.gov.uk/planning
Email: envprotection@richmond.gov.uk
Tel: 020 8891 1411
Textphone: 020 8891 7120

LONDON BOROUGH OF RICHMOND UPON THAMES

City Of London
City Of London
PO Box 270
Guildhall
London
EC2P 2E

Letter Printed 14 October 2024

FOR RECOMMENDATION DATED
14 October 2024

The Town and Country Planning Act 1990, (as amended)
Consultation – Raise no Objection

Application: **24/2265/CON**
Your ref: 24/00836/FULEIA
Our ref: DC/KNP/24/2265/CON/CON
Applicant: City Of London
Agent:

LOCATION
99 Bishopsgate London EC2M 3XD

for

PROPOSAL
Partial demolition of the existing building, retention and partial extension of existingbasement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground
floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

That the City Of London be advised that the London Borough of Richmond upon Thames raise no objection to the above mentioned proposal.

Yours faithfully,



Robert Angus
Head of Development Management

Historic England

Ms Amy Williams
City of London Corporation
Guildhall, PO Box 270
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01582264

11 October 2024

Dear Ms Williams

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

99 BISHOPSGATE LONDON EC2M 3XD
Application No. 24/00836/FULEIA

Thank you for your letter of 9 September 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposed development would introduce a very steep edge to the City's tall buildings cluster, close to St Paul's cathedral, in the strategic view of it from Waterloo Bridge. As such, it would reduce the pre-eminence of the cathedral on the skyline, resulting in clear harm to the significance of one of the nation's most important buildings. The proposals fail to accord with important development plan policies, including the London View Management Framework (LVMF), which seek to protect the cathedral as a Strategically Important Landmark by ensuring its visual prominence on the skyline.

Additional harm would be caused to the striking ensemble of the highly graded listed buildings near Whitehall in the protected LVMF view from St James' Park. Further information is required in order to fully understand the potential impacts on the significance of the grade I listed Church of St Ethelburga opposite the site.

Historic England strongly objects to the grant of planning permission.

Historic England Advice

Significance of the heritage assets impacted by the proposals

a) St Paul's Cathedral

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

The cathedral sits on the highest point in the City and is a world-famous landmark. It was founded in 604; the rebuilding of the previous medieval cathedral on the site was undertaken by Sir Christopher Wren from 1675-1710. His Baroque design, incorporating a great dome, is instantly recognisable and has long presided over London's skyline. It is seen amongst the spires of Wren's City churches and represents the crowning achievement of one of the most highly regarded figures of western architecture. It's symbolism of London as a City and Diocese is unrivalled.

The cathedral was designed to be seen from all over London, towering over its surroundings. Its prominence has been eroded by twentieth century and later development, which has in turn resulted in various long-standing protection regimes that sit alongside the regular statutory protection of listed buildings and their settings. Protected strategic views of the cathedral are currently formalised in the London Plan and associated London View Management Framework (LVMF 2012).

A new setting study has been commissioned with the intention of filling the gaps in understanding left by these management tools and presently exists as a mature draft: *The Setting of St Paul's Cathedral and its Contribution to Heritage Significance: An Analysis and Evidence Base* (City Plan 2040 Regulation 19 Consultation version, June 2024). This provides the most comprehensive understanding of significance, as derived from setting, currently available.

The document describes key elements of the cathedrals setting which are fundamental to its significance and the way it is experienced (SB1, p22-23). Clear sky and the space around the cathedral ('clear skyspace') contribute because it 'enhances and ensures visual prominence and therefore the intended architectural effect'. Similarly, the river corridor contributes to an appreciation of the scale and visual prominence of the cathedral, the connection with the majority of the celebrated artistic representations of it, and the appreciation of the architectural and cultural significance of it in its wider urban context. The study concludes that 'any incursions into the sky space around the cathedral have the potential to cause harm to its significance' (para 6.5).

Waterloo Bridge is widely regarded as providing some of the best panoramic views of the City, with St Paul's as their focus, and of Westminster in the opposite direction. Such views are experienced by huge numbers of people daily. The cathedral derives significance from its setting in these important views in the way it is seen as the pre-eminent landmark. In order to fulfil its architectural and symbolic intent, it must be possible to appreciate its monumental character. The clear sky backdrop to St Paul's, which was once much more expansive, is critical to this appreciation.

LVMF 15B.1 and B.2 Waterloo Bridge Downstream are the eastward views and mark the beginning and end of the sequence of views experienced from the bridge. The cathedral is seen with the cluster to its right. A visual relationship between the

cathedral and the tall buildings of the cluster as two distinct forms with space between them has been established as the cluster has been shaped, mindful of the cathedral's significance, over the past 20 years. The cathedral then dominated the foreground and middle ground of the view, with clear sky around it, while the modern tall buildings of the cluster form the background to the right.

b) St James's Park, the Horse Guards and Whitehall Court

St. James's Park (Grade I), Horse Guards (Grade I) and the Whitehall Court (Grade II*) capture another important symbolic aspect of London: the relationship between its governmental and royal legacies. Highly important in their own right, these assets are also essential to London's character and identity. They are appreciated from a variety of places and their settings are of heightened sensitivity in strategic views. One such vantage point is captured by LVMF View 26A.1, a view from the centre of the bridge across the lake in the centre of the Park, where the buildings create a lively, picturesque roofline in the backdrop. Historic architecture and landscape complement each other to form a highly significant place.

c) Former Church of St Ethelburga within Bishopsgate

St Ethelburgas is one of few medieval churches (rebuilt c.1411) that survived the fire of London but severely bomb damaged in 1993. It was thoughtfully rebuilt and reopened as the Centre for Reconciliation and Peace in 2002. The church is Grade I listed indicating its exceptional interest. It is surrounded by tall buildings which contrast dramatically with its miniature scale, leaving the church vulnerable to further change.

Impact of the proposals

The proposals are for the part demolition and part retention of the existing tall building on the site, to create a new 53 storey tall building designed by RSHP. This would see the reuse of the existing core with a new, taller externally braced structure with glazed curtain walling formed around it. The existing building height of 121.5m AOD would be approximately doubled to 253.5m AOD.

a) St Paul's Cathedral

The proposals would erode the clear sky back drop above the Heron Tower adjacent to the cathedral, as seen from Waterloo Bridge - LVMF View 15B.1 in particular. Here, it would create a new profile for the cluster, rising abruptly from Angel Court, resulting in a cliff edge which is noticeably higher than the overall height of the cathedral. The chamfered form of the top of the building offers little mitigation - its leading edge would rise steeply to the apex. In this key view, the impact on the significance of the cathedral would be most damaging.

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As a consequence of the scale and massing of the proposed development, it would compete with St Paul's Cathedral and would contribute to its visual prominence becoming further diminished, resulting in clear harm to significance and the ability to appreciate it. The large, bulky form of the cluster as a whole would be brought closer to the cathedral, increasing its dominance and cumulative impact.

The cathedrals prominence on the skyline would be affected in much wider ranging river views and harm to significance would therefore occur more broadly than just strategic views, albeit to a lesser extent. The view from Somerset House, from where Canaletto's celebrated depiction of the City was painted, is important. The visual impact would be more extreme due to the closer proximity of the cluster to the dome of St Paul's, as shown in View 32 of the Heritage and Townscape Visual Impact Assessment, albeit partly screened by trees.

b) The Whitehall buildings

The proposals would result in further harm to the Whitehall buildings and St James's Park, where the development would be seen alongside the consented 55 Bishopsgate behind Duck Island. Though of a lower height, so that a smaller proportion of the development would be visible compared to the latter, it would sit directly behind the southern end pavilion roof of Whitehall Court and encroach further into the characterful view.

The proposal would harm the significance of these buildings by reducing their prominence and also by visually competing with their picturesque roof forms. This harm would also occur to the registered landscape, which derives some of its significance from its interplay with the historic buildings in its setting described above. It is likely that this harmful impact, in the case of both developments, would be more prominent at darker times of the day.

c) The Church of St Ethelburga's

The potential visual impacts on the setting of the church as experienced from its churchyard have not been tested; the cumulative change of both schemes 55 and 99 Bishopsgate could be dramatic.

We understand that present wind conditions generated by existing tall buildings has caused a window on the northern elevation of the church to buckle and this has now been boarded up. The proposed development appears likely to further worsen wind conditions around the church. The increase in scale alongside the removal of the existing podium directly opposite it would likely exacerbate the existing problem. Alongside construction impacts, the proposed development may have implications for the viability of the existing use of the former church, which provides for its on-going conservation.

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Legislation, policy and guidance considerations

a) The Planning (Listed Buildings and Conservation Areas) Act 1990

- Section 16 (2) and 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the statutory duty on local planning authorities 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.
- Section 72 (1) of the Act also requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

b) The Local Plan

The City of London's adopted Local Plan (2015) seeks to safeguard the City's listed buildings and their settings (CS12), and requires significant views of the cathedral to be protected or enhanced, including views from Waterloo Bridge (CS13). The site sits within the Eastern Cluster policy area (CS 7); which alongside the tall buildings policy (CS14) allows for tall buildings where their architecture is of the highest calibre and they would not harm the City's historic environment or the wider London skyline.

The broad aims of these policies are carried forward in the emerging City Plan 2040. Regarding St Paul's, it further states that 'In views from the south bank west of Blackfriars Bridge and from Waterloo Bridge the Cathedral is seen in relation to the City's eastern cluster of tall buildings. The cluster appears to the right of the Cathedral and does not intrude into its backdrop. There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and should be maintained.' (para 11.6.11).

This ambition is not borne out in the profile of the cluster envisioned in the emerging plan as viewed from Waterloo Bridge, however, and would not be achieved by this proposal either. Both illustrates a sheer rise up to the apex, rather than any stepping up from the gap. Historic England has, on this and other grounds, raised issues with the soundness of the draft City Plan.

c) The London Plan

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St Paul's Cathedral is one of only three Strategically Important Landmarks identified by the Mayor, as a landmark that makes a very significant contribution to the image of London and is consequently protected in strategic views.

London Plan Policies HC3 and HC4 concern strategic views and the LVMF. The latter policy requires that 'Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate…as seen from designated viewing places.'

The LVMF SPG provides guidance specific to views 15B.1 and 15B.2, stating that 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect' (Para 266). It also states 'Development should not dominate the peristyle, drum, dome or western towers of St Paul's Cathedral in the background of the view (Para 267).

The guidance for View 26A.1 (St. James's Park) advises that development in the background of this view should be of a scale, mass or form that does not dominate, overpower or compete with either of the existing two groups of built form or the landscape elements between and either side of them. New buildings should appear as part of the existing groups of buildings; buildings that appear above the central part of Duck Island would damage the viewer's ability to see these groups of buildings in conjunction with the landscaped foreground and should be refused.

c) The National Planning Policy Framework (NPPF)

Chapter 16 of the NPPF concerns the historic environment. It requires a robust and proportionate understanding of the significance of any affected heritage assets 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 (paras 200-201).

Any finding of harm is a consideration to which the decision-maker must give "considerable importance and weight" and "less than substantial harm" in NPPF terms does not imply "a less than substantial objection".

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).

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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) Historic England guidance

Historic England's **The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning: 3)** provides general guidance on understanding setting and its contribution to significance. The following staged approach to decision-taking is recommend:

- Step 1: Identify which heritage assets and their settings are affected
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes

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
- Change to skyline, silhouette
- Lighting effects and 'light spill'

Historic England's **Tall Buildings HEAN 4** (March 2022) provides guidance on planning for tall buildings within the historic environment. Para 4.15 notes that strategically planning for tall buildings in clusters can bring townscape benefits while avoiding or reducing the potential impacts upon the historic environment. When considering the formation of tall building clusters, it is important to take account of:

- Maximum building heights and horizontal extent;
- Variations of building heights e.g. to allow the stepping down of heights towards the edges of the cluster, or to create layering of buildings that can add

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townscape interest;
- § Cumulative impacts;
- § Profile, silhouette and edges;
- § Impact on and response to the historic environment; and
- § How the townscape benefits of the cluster can be maintained.

Historic England's position

Historic England objects strongly to the application. The proposals would harm the significance of St. Paul's Cathedral, one of the nation's most important buildings. They would make the form of the cluster more assertive and less deferential, in contrast to its existing edge, formed largely by the Heron Tower (110 Bishopsgate), which steps up from the sky gap to a lower apex.

That development bore significant scrutiny at public inquiry in 2001. The Secretary of State found that it would not harm the setting of St Paul's and granted consent. It might be concluded that a critical point in its acceptability was the overall height of the proposals relative to the cathedral, which it did not exceed, and its sympathetic stepped form as viewed from Waterloo Bridge (IR 15.15, 15.35).

At the time, Tower 42 was the apex and importantly appears to be of a similar overall height to the top of the cathedral. The progression in building mass rising up from Angel Court to this point was considered to be a better resolution for the emerging cluster, and consequently St Pauls, than 'the abrupt change that is currently seen'. We broadly agree that stepping up from the sky gap helps to retain the ability to appreciate the significance of the cathedral to a greater extent than an abrupt step would.

More recently, consent has been granted for 55 Bishopsgate, a building which would appear only slightly shorter than what would be the very tall apex at 1 Undershaft, creating a substantial step up in height much closer to the cathedral as the outer edge of the cluster. There was consensus among Historic England, St Paul's Cathedral, the GLA and City officers that this would harm the cathedral's significance. In our objection to that application, we noted that increased bulk and prominence at the edge of the Cluster would draw the eye away from the cathedral, and add to its overall cumulative impact.

The current proposals would create an abrupt upward step at the edge of cluster, much taller than the overall height of the cathedral and closer to it, showing little regard for its significance in the strategic view. The development has instead been designed to step down slightly from a consented scheme that has already been acknowledged by your Authority as harming the significance of the cathedral.

Adopted policy and guidance seeks to manage change in a way which would preserve and, where possible, enhance viewers' ability to recognise and to appreciate the

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cathedral as a Strategically Important Landmark. In respect of the guidance specific to the Waterloo Bridge views, the proposals would not maintain the visual prominence of the cathedral and would instead dominate it.

The proposals therefore fail to comply with adopted policies in the Local Plan and London Plan which seek to protect these strategic views. The proposals further appear to directly contradict emerging policy which establishes that the gap and buildings stepping up from it should be maintained (para 11.6.11, City Plan 2040).

In the language of the NPPF, harm to significance would be less than substantial and in the middle of this range. Harm to an asset of the highest significance attracts the greatest possible weight. We are not persuaded that the design has evolved to overcome this serious harm in a meaningful way and do not consider that could therefore represent good design as envisaged by the NPPF and NDG. The resolution of the cluster in this way would greatly diminish the townscape benefit of clustering tall buildings as a means of protecting London's historic environment, which is one of its core purposes.

In the case of St James's Park and the Whitehall buildings in LVMF View 26A.1, the development would compete with the picturesque roofline of the highly significant listed buildings. Harm to their significance and that of the park would be less than substantial and low in the range, but would contribute to a higher level of cumulative harm with 55 Bishopsgate.

The potential impact on St Ethelburga's requires further investigation as described above, in order to better understand potential adverse impacts. Once this is established, we would like to meet with you and other stakeholders to discuss how the building and its existing beneficial use can be appropriately safeguarded.

We do not consider that the proposals would deliver any heritage benefits. We note that increasing the permeability of the block and the reinstatement of historic routes through may be beneficial to the character of the City in principle. However, we do not consider that this would be achieved in a sympathetic way and could be achieved by a different development.

Given the considerable disbenefit that the additional height these proposals would impart, we query whether retention and upgrade of a greater proportion of the existing building would be a more sensitive and sustainable way to redevelop the site.

Recommendation

Historic England strongly objects to this application and recommends that it should be withdrawn or refused. While it will be for your authority to balance all considerations in this case, the harm entailed by these proposals to the significance of one of the

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nation's finest buildings, to that of the historic buildings and landscape at Whitehall and St. James's Park, should attract the highest weight.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

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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CAROE ARCHITECTURE

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Amy Williams
Development Division
Corporation of the City of London
Sent via email only

18 October 2024

Dear Amy,

Planning Application Response Letter: 99 Bishopsgate (ref: 24/00836/FULEIA)

Introduction

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, in response to a live planning application for proposals at 99 Bishopsgate.

This letter has been prepared following a review of material on the planning portal, and pre-application material received to date. It has been informed by a review of the documentation issued to us to date and the pre-application consultation meeting held on 8 November 2023.

It will not be unexpected to the City, nor the applicant, that Chapter have substantial concerns about this application. Our strong recommendation to the City decision makers is to refuse approval for this development. We set out the reasons why in the following. However, before doing so, we do want to express regret for this situation. Our discomfort in-part arises because, whilst there have been good conversations which have been respectful and cordial, it appears to us there has been no real listening or receptiveness to our concerns. The scheme as submitted is, to our understanding, unchanged materially from that at pre-application.

It is also really unfortunate, after many years of conversation and engagement, that there is not a much more robust consensus within the development and planning community about how the setting of St Paul's Cathedral should be protected. Emerging planning policy has clearly been engineered to facilitate this damaging, harmful development of 99

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Bishopsgate, without consideration for the harm and broader consequences and loss for London's citizens. At the Corporation's own heritage event on the City Plan 2040 (held in May 2024) the City described the 'pivotal role' that heritage would play in the plan with regard to 'placemaking, the economy, and wellbeing.' It is difficult to see how this publicly expressed objective is achieved through the proposals for 99 Bishopsgate – given the evident and significant impact on St Paul's.

Whilst Chapter is fully and vocally in support of the City Corporation's aims for creating a diverse, culturally rich, energising and economically prosperous planning environment, we do not understand the judgements that have resulted in, what we perceive as, the supportive promotion by the City of this site for a harmful, very tall building which impacts detrimentally on the setting and significance of St Paul's. Does this arise from an elective corporate blindness to the harm, or perhaps this is a more deliberate choice by the opinion formers to allow commerce to over-ride the duties of stewardship and care for our collective values of heritage and identity? Either way, we suggest that the approach is both mistaken and also is not necessary.

The City Plan 2040 envisions a major enlargement of the tall buildings cluster that is now conceived. We have concerns with aspects of this cluster and the harm it would cause St Paul's, and suggest that there must be land with sufficient capacity for the sustainable commercial growth of the City that does not necessitate significant and irrevocable harm to St Paul's such as that caused by 99 Bishopsgate. We submit that the quantum of development offered by the proposals could, and definitely should, be delivered elsewhere by other, non-harmful means, and is not justified by economic argument on this site in this harmful manner.

Summary

The Cathedral wishes to object to this planning application, which is contrary to both policy and conscience. This objection is due to the adverse impact of the scheme in relation to the character and composition of strategic and local views in which St Paul's is a Strategically Important Landmark, and crucially the heritage harm that the scheme would cause to the Grade I listed Cathedral through detrimental and ill-considered alteration of its setting.

Viewed in isolation the design itself is of high quality – to be respected and admired. However, in our evaluation this is a good building which,

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simplistically, is in the wrong place, with the wrong form, and substantially out of scale for its proposed location, causing multifaceted heritage harms. In our view, these issues are all avoidable but could only be redeemed by major changes to the proposals, which should therefore be refused. There has been no receptive listening to representations at pre-application stage; there has been no attempt to address the harms, in part it seems because the City planning team are not attempting to require design changes, in a process of managed facilitation we have not experienced in the past.

Background to Comment

The Cathedral welcomed pre-application discussion regarding this scheme, which lies within a key part of the setting of the Cathedral. A meeting was held on the 8th of November 2023, and further information was subsequently provided in early 2024.

We do commend and acknowledge the approach to consultation undertaken by the project team, the breadth of information issued for discussion, and the involvement of our colleagues in the planning team at the Corporation of the City of London.

In particular, the sophistication of the visuals utilised to illustrate the emerging proposals (especially in kinetic views) have assisted our understanding of the scheme at pre-application – an understanding we have applied to review of the full submission scheme.

We further note that the submission scheme has not meaningfully changed to address any of our core concerns since our last comments were issued. As such, much of the commentary below has been adapted from our earlier letter of engagement.

Relevant Planning Policy

For concision in this submission, the well-rehearsed and understood relevant planning policies are included as an enclosure to this letter.

Comment

Heritage Assessment Provided (at Pre-Application, to Inform Design Development, and at Full Application)

We thank the project team for the heritage assessment concerning the Cathedral, circulated to us after the pre-application meeting. This pre-

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application assessment is evident within the final heritage assessment submitted.

While the spirit of assessment was welcome, at pre-app we noted the need to see greater detail on the nuance of setting considerations. These should be more detailed and nuanced and go beyond either just LVMF views for wider appreciation, or the immediate setting of the cathedral as part of the St Paul's Cathedral Conservation Area for local views. Unfortunately, this heritage assessment has not been meaningfully developed for the formal submission, leading to a heritage baseline assessment that is substantially lacking in key areas.

Therefore, we submit to the City that heritage impacts cannot be understood and weighed in the planning balance appropriately. In general, we do not consider the level of assessment provided is proportionate or satisfactory to inform the decision-makers fully and correctly.

We understand the need for proportionality within the planning process, however paragraph 200 of the NPPF states that 'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.' In this case, we do not consider the assessment provided is proportionate to the exceptional significance of the Grade I listed heritage asset which is impacted and does not allow a meaningful understanding of the specific heritage impacts of the proposals.

Understanding the Setting of St Paul's and its heritage significance.

We submit and represent to the City that a fuller, more satisfactory and relevant evaluation of the heritage context is needed for this development. We proffer 'The Setting of St Paul's Cathedral its Contribution to Heritage Significance: An Analysis and Evidence Base (City Plan 2040 Regulation 19 Consultation version, June 2024)' as a relevant basis for critical evaluation of this project. The 'Setting Study' was jointly commissioned by Chapter with Historic England. [1]

[1] The enclosed version of the report was issued for the Regulation 19 consultation on the City Plan 2040. The version referenced above is appended to this letter. A final version of the report will follow at a later date. This will add case studies (Part Three) and additional photographs and images, but no substantive changes to the wording of Parts One, Two and Four are planned.

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The mature draft of the Study includes detailed research and assessment, undertaken in-line with Historic England Guidance, most notably 'GPA3: The Setting of Heritage Assets'. Even in its present incomplete form, the report is of great use in understanding the contribution of the setting of the Cathedral to the heritage significance of the Grade I listed building, and how this significance can be appreciated. In turn, this assists the regulator with a greater (and appropriate) understanding of the potential heritage impact of development in the setting of St Paul's.

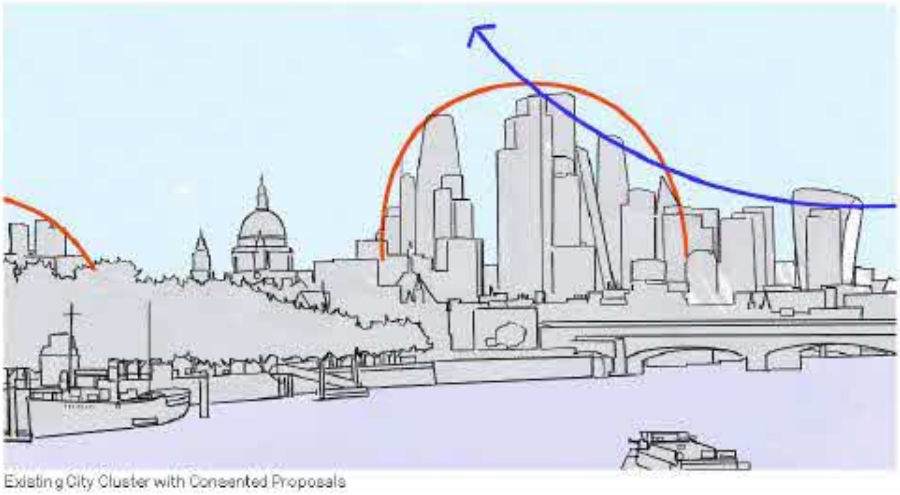
Impact to Local and Strategic Views

The proposals involve the construction of a new very tall, massive building on the edge of the Eastern Cluster. As such, the proposals will be appreciable in local views (As outlined in the City's Protected Views SPD) and strategic views as identified within the LVMF.

Within these views the cluster appears to the right-hand side of the Cathedral. It has long been the aim of policy and guidance to ensure that the visual prominence of the Cathedral is maintained within these views, especially in relationship with the Cluster, which was intended by policy to have a central high point (around 1 Undershaft) and to diminish in height down to the context of St Paul's to the left and the River Thames to the right. The dominance of St Paul's was also to be preserved by establishing suitable 'stand-off' and space around the Cathedral.

This policy approach is even broadly indicated within the application material (pg. 14 of the Design and Access Statement) which includes the diagram below, noting that The site is situated on the edge of the cluster and forms an important transition from the lower buildings to the north and the taller buildings of the cluster further south.

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Existing City Cluster with Consented Proposals

Given its form and location, this development does not therefore accord with that well understood and long-managed policy and urban design objective for the cluster. We therefore consider the proposal will harm key strategic and local views.

The height and massing of the proposals will harm the character and composition of strategic and local views contrary to policy and guidance. We consider that the height and massing of the scheme will further add to the breadth and harmfully obtrusive presence of the Cluster in these views. In addition, the proposals will create an edge condition at this side of the Cluster, directly adjacent the Cathedral, will be a sheer drop off, rather than a sloped and considered 'designed form' comprised of multiple buildings of different massing. This will further harm identified views. This effect will also unacceptably erode the skygap between the Cathedral and the Cluster, important to the character of key views, the ability to read the Cathedral and which is vital to both prominence and dominance of the edifice, which is a defining characteristic in and for the globally recognised City of London. All of these aspects will negatively affect an appreciation of the Cathedral as a Strategically Important Landmark.

This is evident in strategic views, such as LVMF views 15B.1 and 15B.2. Here, guidance states that the proposals should *'seek to complement the City's* eastern cluster of tall buildings with buildings of a height appropriate to their site.*'* We consider that this proposal is materially at odds with this guidance, which is not satisfactorily assessed within the applicants HTVIA, which for 15B.1 notes 'the projecting principal cores and slope of the

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western edge would articulate a subtle step down within the City Cluster, from 22 Bishopsgate to Angel Court beyond its edge.'

We fundamentally disagree with this erroneous characterisation by the applicant's heritage, townscape, and VIA assessors. We do not consider the step-down depicted subtle, successful, or appropriate for the site. As noted above, we consider the scheme will not complement the cluster in this regard and thus is impactful to St Paul's as an SIL. The assessment submitted by the applicant is so deficient, we suggest, that the regulator should either undertake their own new assessment, or commission a more properly objective and professional evaluation (see below for more on this concern).

In addition, guidance states that the character of a view should be preserved if proposals draw the cluster closer to the cathedral, which also evidently is not achieved. Furthermore, we do not consider the cathedral's relationship with its clear sky background has been preserved as required by guidance. Guidance also states that proposals 'should not dominate the dome or western towers,' and that 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect.' Evidently this is not achieved by the proposals.

For the reasons outlined above, we consider that the scheme would unduly dominate the dome when understood cumulatively with the rest of the consented cluster, contrary to the wording of guidance. Ultimately, we do not consider that the proposals would accord with the LVMF guidance to positively 'show how they contribute to the spaces and buildings immediately fronting the river, including the strategically important landmark of St Paul's Cathedral'.

This is most evident in LVMF views 15B.1 and 15B.2 as outlined above. The aggressive massing of the proposals and their negative effect on the balance between the cluster and the cathedral, important to the character and appearance of strategic views, would also be appreciable in views 17B.1 and 17B.2 from Hungerford bridge and 16B.2 from Gabriels Wharf, which are also harmed.

We also consider these issues affect those views of the Cathedral identified within the City's Protected Views SPD (2012). Here, the Backdrop and Skyline Setting of the Cathedral section is relevant. We consider that the proposals are contrary to guidance that states proposals should not worsen

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the already detrimental effect of development that 'crowd(s) close to the Cathedral on the skyline.' Crucially, the guidance states that:

'There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and so should be maintained.'

We consider that the proposals do not adhere to this guidance on strategic and other local views.

We therefore do not consider that the proposals satisfactory comply with adopted policy within the City's Local Plan (January 2015), specifically policies CS13 Protected Views, Policy CS14 Tall Buildings or Policy CS7: Eastern Cluster. We also do not see how the proposals comply with the relevant policies within the London Plan.

Heritage Impact

We consider that the proposals will cause significant harm to the heritage significance of the Grade I listed building, and how this significance is appreciated.

This harm will arise through alteration of and detriment to the Cathedral's setting, linked to the visual impact described above. The contribution of the setting of the Cathedral to its heritage significance is described and understood within the Setting Study, as noted above. This is related to, but goes beyond, impact to views (see para 1.9 of the Setting Study).

Of particular relevance to this impact is the 'clear skyspace' factor of the setting of the Cathedral, and how this contributes to significance. Also of relevance is 'the river corridor' wherein the proposals would be most appreciable and impactful. Both are assessed within the Setting Study.

In terms of heritage significance, the visual prominence of the Cathedral is indicative of its multifaceted historic interest. St Paul's was designed as a spiritual, cultural, civic and architectural focal point of the City. Its height, massing, and form, rising above wider London, has historically encapsulated these elements of its significance. It also allows for an understanding of the building's relationship with the topography of London, and the historic reason why such an important place of worship would have been

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constructed on Ludgate Hill. In addition, its visual prominence and location against clear sky has historically contributed to and allowed for an appreciation of its architectural interest, from the baroque detailing of the western towers to the poignant and striking form of the dome.

The Cathedral is the most prominent historic structure in the City of London. Policies for the City cluster of tall buildings were intended to maintain the dominance of the Cathedral within the City skyline. Key to these two characteristics (prominence and dominance)- both today and over 25 years of design management of the cluster - is the skygap between the cluster and the Cathedral and thus also the form of the cluster (see p.108 of the Setting Study, which discusses the curated nature of the cluster, and that *'*maintaining skyspace with the Cathedral sustains the visual prominence of the dome.*'*).

We consider that a correctly informed heritage assessment, based on a methodology centred in published Guidance and evaluated in line with the baseline of the Setting Study, would conclude that there is significant heritage harm caused by this proposal.

This harm arises, in-part, through the erosion of clear skyspace around the Cathedral, which contributes to the significance of St Paul's and the way this significance is appreciated as outlined in the Setting Study (see, for instance, pp. 22-23, and in particular paragraph 6.5 of the Study). The proposals would therefore also detrimentally affect the skygap – the clear sky distance between the cathedral and the cluster – causing harm. Harm also arises through increasing the height, massing and physical presence of the cluster relative to St Paul's, and through creating an obtrusive hard cliff-edge to the cluster close to the Cathedral.

The proposed extended and hard-edged cluster, enabled by an eroded skygap, would detrimentally alter the way in which the historic pre-eminence of the Cathedral, signified through its scale and size in comparison to its setting, is appreciated. This contribution to the significance of the Cathedral would be disrupted by the massing of the cluster, which would alter the 'centre of gravity' for the views of the Cathedral, leading to it to be further challenged and dwarfed by the cluster, thus diminishing its dominance and affect its features of architectural interest, the dome and the towers, and how they are appreciated. This is evident in strategic views (such as 15B.1, above) and would affect an

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appreciation of the significance of the building from the river corridor, as described in the Setting Study.

This heritage harm is not limited to strategic views. Local views not identified elsewhere (such as the view from Somerset House) also illustrate this heritage harm. We comprehend the screening effect of trees in this location – though would seek to note that the management of trees along the embankment and elsewhere is a long-held aspiration of the Cathedral.

Meeting the evidence and evaluation requirements of the NPPF

As we note above, there is a duty under the NPPF paragraph 200 for the regulator to be informed by a sufficient and satisfactory assessment of significance, provided by the applicant. We invite the planning team to consider that these matters are not addressed thoroughly, objectively or meaningfully in the Heritage Appraisal by the applicant. We suggest that the planning team should either require the applicant to resubmit this unsatisfactory appraisal, or the City should commission their own expert opinion – which we suggest could use the Setting Study as a more satisfactory baseline for understanding the heritage significance of the Cathedral and its context.

As NPPF 201 states 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal' which should take into account 'the available evidence and any necessary expertise'. We suggest the Setting Study could be used in this regard.

We particularly note the role the planning authority has with regards to paragraph 203 of the NPPF, to have regard to 'the desirability of sustaining and enhancing the significance of heritage assets' and 'the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality' and 'the desirability of new development making a positive contribution to local character and distinctiveness'.

We suggest that the materials submitted by the applicant in support of their proposed development are unsatisfactory and that the City should much more closely scrutinise the baseline significance, the objective evidence of impacts and the proper consideration of care and stewardship for heritage assets. We submit that, performed correctly, the only conclusion can be that this application, which runs counter to policy, should be refused.

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Discussion of Design Development & Attempts to Avoid, Minimise, and Mitigate Impacts

The pre-application presentation from the applicants and associated information described, in part, how the architectural proposals have been adapted to the site to limit visual impact and heritage harm. This design methodology is also outlined within the submission material.

Our understanding is that the 'chamfered edge' of the proposals, coupled with the materiality and massing, is intended to reduce the overall massing and presence of the proposals in key views.

We submit that, whilst selection of materials and the cut-away winter-gardens of the design as proposed may in some way soften the visual harm and impact in certain conditions, it is impossible to fully or adequately mitigate the harmful reality of a building of this height and massing as proposed, in such close proximity to the sky space around the dome. The visual and heritage impact will remain and will be significant. We suggest that the design will inevitably be more dominant and harmful, as it appears in certain changing conditions i.e. light levels, sun glare and weather – however expensive and well detailed the cladding package will be.

We reviewed the additional design development information shared with the Cathedral in March 2024 which is broadly echoed within the submission material. The initial options modelled at first sight appear extensive. We understand that the 'modelling profiles' explored in the massing studies, despite having been requested to lessen visual impact, have clearly not achieved this aim: we question whether really there was any sincere motivation to do so, as there was no meaningful or evident consideration of reduction in the quantum of development. In fact, the massing studies appear to show that the development brief requires a pre-determined development area and value – and the massing studies are playing architecturally within a fixed metric. There is no thorough analysis of any scheme that markedly reduces the bulk, height and heritage impact of the building, informed and led by a conservation-management approach. The options therefore do not illustrate how the clearly harmful impacts could be entirely designed out.

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There are aspects of the Design and Access Statement that speak to options other than full redevelopment (see pp. 39-41). We cannot discern the exact reasoning behind the eventual, most intrusive and harmful, option chosen.

We submit therefore that the options appraisal is unsatisfactory from a heritage perspective and therefore not in accordance with NPPF 206 that any harm should require clear and convincing justification.

If there is no attempt to design out harm due to viability judgments, this brings us back to the necessary conclusion that this is the wrong building on the wrong site. 99 Bishopsgate is the wrong site for a tall building at all given its prominent 'edge condition' in the cluster. If the site has been bought at too high a cost, this temporal and material error should not be an excuse or rationale for irreparably harming the setting of the Cathedral and how this public good is enjoyed and appreciated by all, forever.

Historic England guidance, the British Standards in relation to heritage conservation, and crucially the policy drivers NPPF, PPG, London and indeed City Policy & Guidance related to heritage conservation, all seek to see heritage harm avoided, mitigated, and minimised. Furthermore, this is linked to the clear and convincing justification for such impacts required by the NPPF.

Unfortunately, we do not consider that this has adequately been borne out within the development of the scheme and is inherent to the principle of a tall building in this location.

We also notice, and mention cannot be avoided here, that it appears that emerging policy has enabled, rather than critically appraised, this oversized and harmful development proposal within the approach to the City Plan Tall Buildings contours policy – which suggests to us at least some form of pre-determination of an approval being granted for this project. We have written separately to raise this as a concern and expand further on this issue below.

Relationship with the Emerging City Plan 2040

As outlined within our Regulation 19 response to the planning policy, the Cathedral has articulated concerns regarding the soundness of the plan in relation to tall buildings, heritage, and key views. This is a concern which is also echoed by Historic England, HMG's statutory advisors on heritage matters. Despite making representations as early as 12th December 2023

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on the emerging contour map (and associated 'jelly mould') policy definition, the current draft of the City Plan, unfortunately, retains the most problematic and harmful issues in this regard. As we phrased it in our representations, the 2040 Plan policies 'bakes-in' harm to the setting and heritage of the Cathedral, which we find incomprehensible as much as it should be found – in its present form, on examination, to be unsound.

As such, whilst the spirit of many such policies within the City Plan 2040 is laudable, we consider that their weight is limited in relation to this application. NPPF 48 notes that the weight given to emerging plans is based upon, in part, the extent to which there are unresolved objections and the degree of consistency between the emerging plan and the NPPF. As noted above, there remain real concerns with the plan in numerous ways, in part related to its compliance with the NPPF. Therefore, even though the City Plan 2040 Tall buildings policy and contour map evidently has sought to enable this type of development in this location. Our feeling remains that this facilitation is inappropriate and without due regard to wider policy nor process, in our view.

As observed above we also have articulated concerns over the relationship between the proposed development and the emerging policies governing development within the City as part of the City Plan 2040. We understand from our meeting that the scheme has directly influenced the parameters of the planning assessment. We continue to feel that this is at best ill-advised and was not soundly grounded in an assessment of heritage impacts. We have previously raised a concern in relation to process directly with the City of London.

We also made clear within our representation on the City Plan 2040 that there could be a perceived conflict of interest with regard to the assessment underpinning the Tall Buildings policy (prepared by the Townscape Consultancy) who are here acting on behalf of this applicant.

We would still welcome further information as to how such processes interrelate and to what extent this project team has interfaced with emerging policy.

As noted, in our view as yet there has been no properly or fully consulted planning policy development which would correctly establish this proposal within the bounds of an acceptable shift in the envelope of the cluster, which will be so objectively and unnecessarily harmful.

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Conclusions

The Cathedral wishes to object to the scheme. We cite above our concerns over unacceptable levels of heritage harm to the Grade I listed Cathedral, impact to the character and composition of key views, and harm to the ability to appreciate the Cathedral as Strategically Important Landmark.

This harm – which is avoidable in our view but appears to have been enabled by the formulation of questionable emerging policy for this site - occurs principally due to proposed overdevelopment to the edge of the cluster. For decades, the policy objective has been to allow for both the form of the Cathedral to be appreciated and there to be 'breathing space' between St Paul's and the Cluster, preserving both prominence and historic dominance of St Paul's in the City landscape. This has long defined the overall massing and form of the cluster in relation to the Cathedral. This policy aim also forms the central premise around view management policy and guidance.

We have seen the cluster grow ever taller and it is now spreading ever wider in recent years. The recent consent of 55 Bishopsgate is an example of this trend in action; a project on which Chapter also raised major concerns, but which was nevertheless approved.

We have always supported and can be excited about the contrast between the modern City and the heritage of St Paul's when this juxtaposition is in a right balance. Our comments relating to 55 Bishopsgate were clearly indicating a marked discomfort with a harmful and encroaching design at the edge of the Cluster. At the time we were critical of what we felt was its excessive height and massing given its location in the cluster, and what it does to the 'gravity' and centrality of the cluster as perceived in views such as 15B.1. That scheme will harmfully draw the eye inexorably away from the Cathedral and cause adverse visual and heritage impact.

This multifaceted harm is consolidated, exacerbated and entrenched through the proposed building to 99 Bishopsgate. We therefore feel, with regret, that there is no alternative but to object.

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We have also indicated with these representations a number of matters of concern over process and evaluation methods, which we submit should inform the decision-makers. We will be glad to further discuss these issues, if given the opportunity.

We hope that this is a letter of comment that strengthens meaningful dialogue concerning the future of the development site in relation to St Paul's Cathedral.

Yours sincerely,

[redacted]

Surveyor to the Fabric

Encl: The Setting of St Paul's Cathedral its Contribution to Heritage Significance: An Analysis and Evidence Base (City Plan 2040 Regulation 19 Consultation version, June 2024)

cc: Rebecca Thompson: Director of Property, St Paul's Cathedral
Tom Foxall: Historic England
Tom Nancollas: Assistant Director (Design), City of London Corporation
Joanne Parker: Principal Planning Officer (Design), City of London Corporation

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Andrew Senior ARP

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Relevant Planning Policies

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:

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

We note the emerging local planning policy within the City Plan 2040, which has recently been submitted to the Planning Inspectorate for examination. We discuss the weight, relevance and issues we have with the 2040 Plan further within our response letter.

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

The Setting of St Paul's Cathedral

Its contribution to heritage significance: an analysis and evidence base

City Plan 2040 Regulation 19 consultation version

June 2024

Historic England

St PAUL'S CATHEDRAL

The Setting of St Paul's Cathedral

Its contribution to heritage significance: an analysis and evidence base

City Plan 2040 Regulation 19 consultation version June 2024

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Historic England

St PAUL'S CATHEDRAL

FOREWORD


Ye Olde
Cheshire
Cheese
PRET
FRESHLY MADE FOOD
88

St Paul's Cathedral is more than a masterpiece of the English Baroque. This is a building both of exceptional architectural ambition and renown, and also a spiritual focus for the people of the Square Mile, of wider London and the nation. St Paul's will never just be a physical symbol, beautifully crafted in stone, lead and gold: St Paul's is a vital and active community of worship. The Cathedral is a living expression of Christian faith and collective endeavour, as well as an architectural marvel: a sanctuary and a beacon.

It is fitting then that these multifaceted values and shared interests can be so clearly understood by the presence of the Cathedral in its surroundings, in the way St Paul's is perceived and interpreted. The Cathedral has a tangible visual presence on the internationally recognised London skyline. It is an important symbol of London and the nation. To those who interact with and in our capital city, the presence and resonance of the Cathedral is much more nuanced, complex and textured. Its presence is missional today and plays an important role in our collective memory.

St Paul's Cathedral has watched over the City of London for over 300 years in this form, but four earlier buildings stretching back over 1,400 years preceded Wren's masterpiece on this site with the arrival of St Mellitus in 604 A.D. As the city we serve has grown and evolved, the Cathedral has remained resolute at its heart. It has stood through celebration, destruction, upheaval and change. More than simply an elaborate backdrop, the Cathedral has been at the heart of events that have shaped our nation and formed our self-perception. A confluence of church and state, St Paul's remains uniquely important to the nation and city it serves, representing faith at the heart of the nation. The cathedral is an anchor point on the continuum of London's growth and change, offering continuity, solidity and reassurance for those who come into contact with this place.

There is a symbiosis and partnership between the dynamic, evolving and vibrant City and the Cathedral at its heart. Our partnership with the City is reflected in the structures of the planning system and the role of the Cathedral within these frameworks. As active participants in the spiritual and social landscape of London, we acknowledge that when the capital thrives, so does St Paul's. This fruitful common interest can be facilitated through the planning system.

In partnership with Historic England, we are therefore pleased to present the St Paul's Cathedral Setting Study. The Setting Study describes and understands the history of the unique setting of the Cathedral, so that all participants in the planning system are aided with evidence and greater certainty in planning for change, now and in the future. This important work is not solely about protection of the setting, which has long been understood in the City processes, but in our terms is about ensuring this incredible building can be appreciated long into the future. It is about celebrating success and seeking clarity about further areas where, collectively, we could better reveal the unique

significance of this building of exceptional heritage value for wider public benefit. We therefore hope that this report helps those who drive, shape and sustain the energetic progress of our capital into the future.



Very Reverend Andrew Tremlett
Dean of St Paul's



Foreword from Duncan Wilson, Chief Executive, Historic England, to follow in final version.

PART ONE:
Technical Summary



1.0 Purpose of this report

What is it and who is it for?

1.1 The purpose of this document is to assist those who are engaged or interested in the management of the setting of St Paul's Cathedral. The Cathedral is a Grade I listed building of exceptional architectural and historic significance. As a listed building, the preservation of the setting of the Cathedral is given the same weight in law as its fabric (s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, see Appendix 2, p.168). To assist in the discharge of this statutory duty, this report provides a robust, evidence-based assessment of the ways in which setting contributes to the Cathedral's significance and to the appreciation of that significance. This evidence can be used in plan making and in the development and determination of proposals that have the potential to affect the heritage significance of St Paul's.

1.2 The contents of the report equate to steps 1 and 2 in Historic England's *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017), and provides information and analysis to inform the preparation of steps 3 and 4.

Relationship to policy

1.3 This is not a planning policy document. It is evidence to assist the implementation of policy and the formulation of new policy. Although, in the report, views are considered to illustrate particular contributions made by setting to significance, this is not a views study (see paragraphs 1.9-1.12) and the document does not identify new viewing places to add to the many that already exist as part of planning policies regarding views (see Appendix 3 p.170).

Endorsement

1.4 St Paul's Cathedral and Historic England will use the study as an evidence base for comment and advice on plan making and development proposals affecting the setting of the Cathedral.

1.5 The City of London and GLA were consulted during the preparation of this document. They have welcomed its substantial contribution to improving public and professional understanding of the Cathedral's setting, but this version of the report (v10) does not represent their views or form part of the formal suite of development plan documents.

Version status

1.6 This version of the report was issued for the Regulation 19 consultation on the City Plan 2040. A final version of the report will follow at a later date. This will add case studies (Part Three) and additional photographs and images, but no substantive changes to the wording of Parts One, Two and Four are planned.

Wider interest

1.7 In addition to its primary role, the evidence base and case studies provide a wealth of information for people who are interested in how the physical context of the Cathedral, including different aspects of its setting, have changed over time.

The Technical Summary

1.8 In this first part of the study, the Technical Summary, the reader will find an explanation of the report's structure, a statement of the Cathedral's heritage significance and the summary analysis of the contribution made by setting to significance. This part of the report also contains concluding remarks, and an explanation of the methodology followed in its preparation.

The difference between setting and views

1.9 This report is about the setting of St Paul's. Views are considered as part of this analysis, but the two are not one and the same. It is important therefore to understand the distinction between setting and views as they apply to heritage assets:

1.10 **Setting** is more comprehensive. It is the surroundings in which a heritage asset or place is experienced and perceived today, and includes the relationship of an asset to its surroundings both in the present and in the past. It is not only visual but can include other environmental factors like noise and historical connections such as land use and architectural intent.

1.11 **Views** are a defined visual impression of a place or asset, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to understanding and appreciating the setting of heritage assets and can constitute part of an asset's significance.

1.12 See Appendix 1 on p.166 for further discussion of this subject.

2.0
Report structure

PART ONE: Technical Summary, p.6
An overview and summary of the study, the analysis and findings, encapsulating what matters and why.

PART THREE: Case Studies. p.161
Three case studies will follow in the final version of the report. The case studies will be selected as a tool kit to illustrate how the contribution of close, intermediate, and distant setting to the Cathedral's heritage significance can be assessed using the fourteen step process recommended by Historic England.

PART TWO: Evidence Base, p.34
The baseline analysis, first of the Cathedral (chapter 8), then of the historical evolution of its setting (chapter 9) and finally of the present contribution of setting to the building's heritage significance (chapter 10).

These chapters provide a detailed examination of the subject. They also contain summary boxes that present this analysis in a concise form. A list of these summary boxes and links to them can be found on p.26.

PART FOUR: Appendices, p.164
Part Four contains useful background information:

- an explanation of the difference between the concepts of setting and views in the planning system;
- the legislation and policy for the management of heritage assets, their setting, and views in London;
- relevant Local Plan policy; and,
- a bibliography and list of sources.


OXO

3.0 Background

3.1 St Paul's Cathedral is first and foremost a focus for faith in London and beyond. It has been an enduring symbol of Christian worship on this site for c.1,400 years and it continues to play a powerful role in the lives of individuals and the nation. But it has always also been universally acknowledged that the Cathedral is, perhaps equally, a place of exceptional cultural importance. Such national and international significance requires careful management to sustain.

3.2 From the time of its completion until the middle of the 20th century, the Cathedral literally and symbolically dominated London. It became central to the identity of the capital as a world city, and the majestic silhouette of the dome and the west towers became embedded in our national consciousness.

3.3 The ability to appreciate the distinctive outline and form of the Cathedral remains for many the most tangible way to engage with and understand its architectural, historic and cultural importance. It is a mark of this special importance that protection of the silhouette has been embedded in planning policy for almost a century, predating nationwide statutory protection of setting by decades.

3.4 Once the City adopted this pioneering policy, St Paul's Heights, in 1938, its concern proved prescient. Though the physical and cultural context of the Cathedral had always evolved, until the middle of the 20th century its dominance on the skyline remained largely unchallenged. However, over the last 70 years, and particularly in the last two decades, the speed and scale of redevelopment around the Cathedral has radically accelerated, challenging its pre-eminent position.

3.5 One response has been to acknowledge the importance of the building as one of only three strategic landmarks in London, the other two being World Heritage Sites (the Palace of Westminster and The Tower of London), and by doing so affirming the significance of St Paul's in both a national and international context. However, the mechanisms for managing change to its significance as a landmark as come to be seen largely through the lens of maintaining specific views, an approach initiated with the St Paul's Heights methodology.

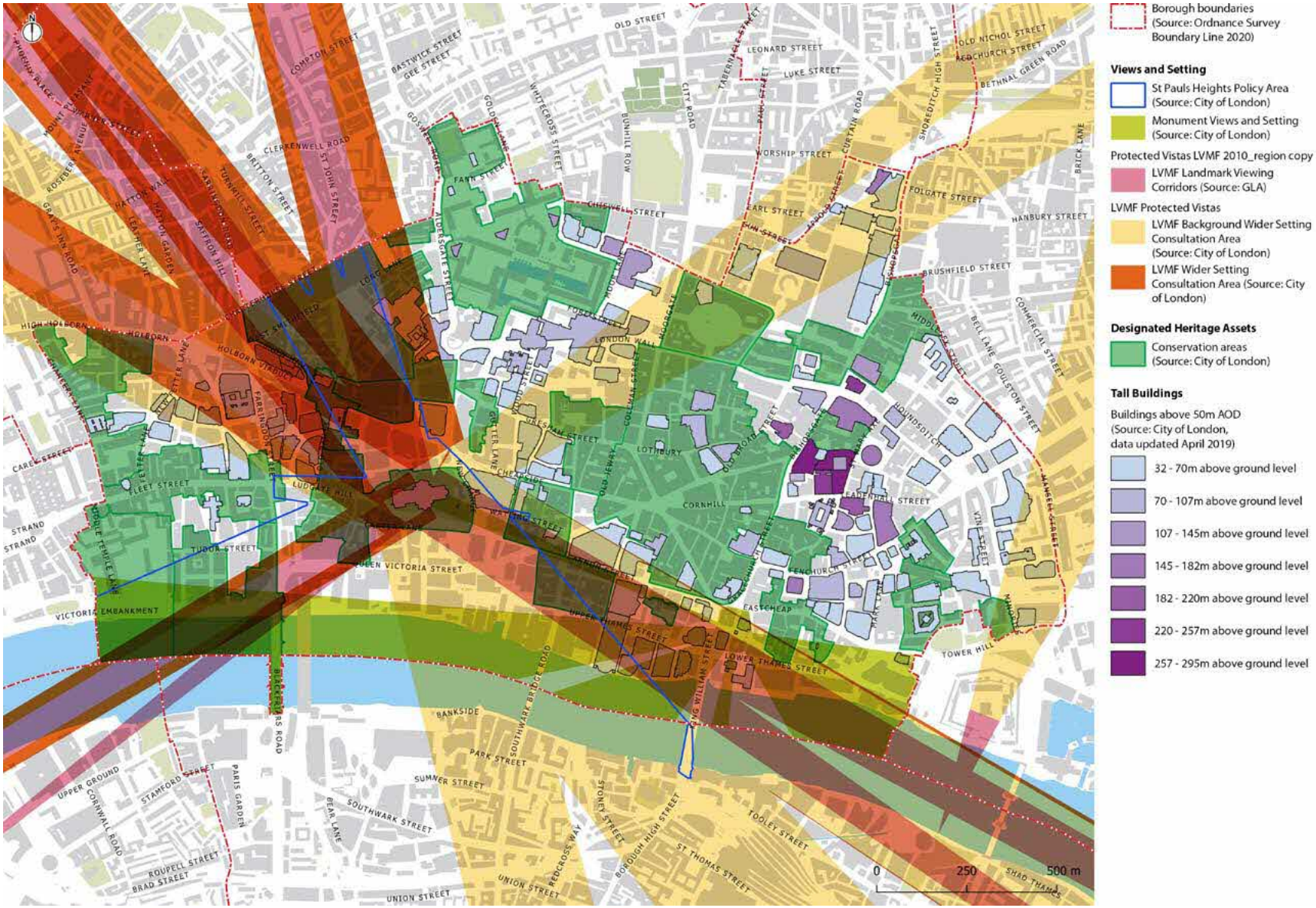
3.6 The sophistication of such views management has increased over recent years and advances in technology, such as verified views and digital modelling, has provided some greater certainty when attempting to

predict the impact of change. But what began as tools are now increasingly regarded and used as a substitute for understanding and consideration of the full impact of development upon the setting of St Pauls and its exceptional heritage significance.

3.7 This is where this study hopes to contribute. The impac of development upon the setting of a heritage asset is distinct from identification of impact upon townscape or a designated view, and one which carries with it statutory duties. However, until now there has been little assessment and explanation of the contribution that setting makes to the heritage significance of the Cathedral, and of the contribution that setting also makes to our ability to appreciate that significance. In other words, what matters and why. For example, the list description, unchanged since designation on the 4th January 1950, runs to a mere 105 words. The weakness of this evidence base is of particular importance becaus of the rate and quantum of development that has occurred within the setting of the Cathedral in the last decades, and especially in the last twenty years.

3.8 Therefore, to assist developers, plan makers and decisio makers, this study aims to fill some of these gaps by t provision of a detailed evidence base and assessment of the contribution that setting makes to the exceptiona significance of St Paul's.





Views and setting policy areas in the City of London, together with conservation areas mapped against tall buildings. Note the relationship between these and the distribution of very tall buildings.


RESVRGAM

4.0
The heritage significance of St Paul's Cathedral

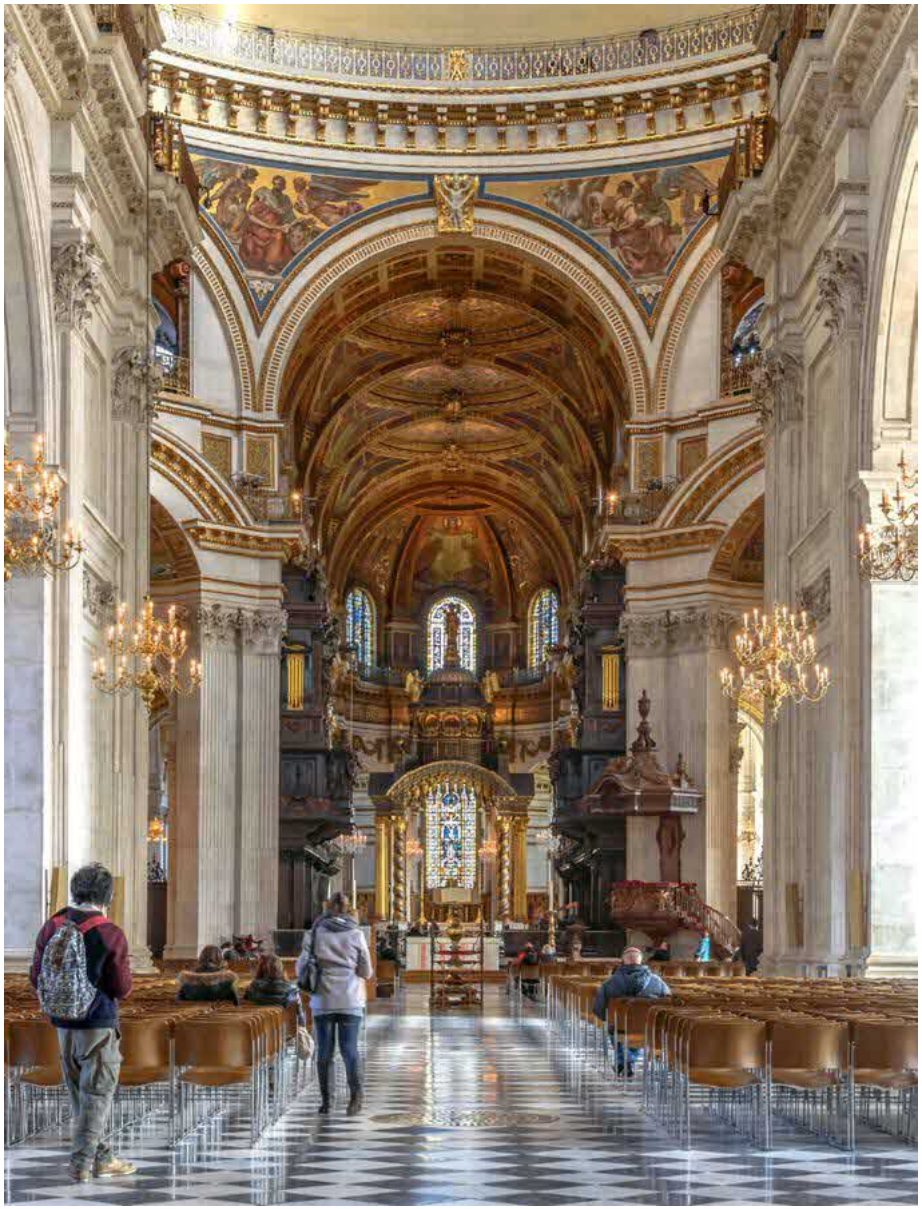
4.1 St Paul's Cathedral was built in 1676-1711, although the design had evolved from first proposals in 1670. It was erected as a symbol of the resurgence of London following the Great Fire and marked the transition in English cathedral building from the Gothic of the Middle Ages to the Classical architecture of the post-Reformation age of the Renaissance. Throughout its life the Cathedral has played, and continues to play, a central role in the lives of both the nation and the capital.

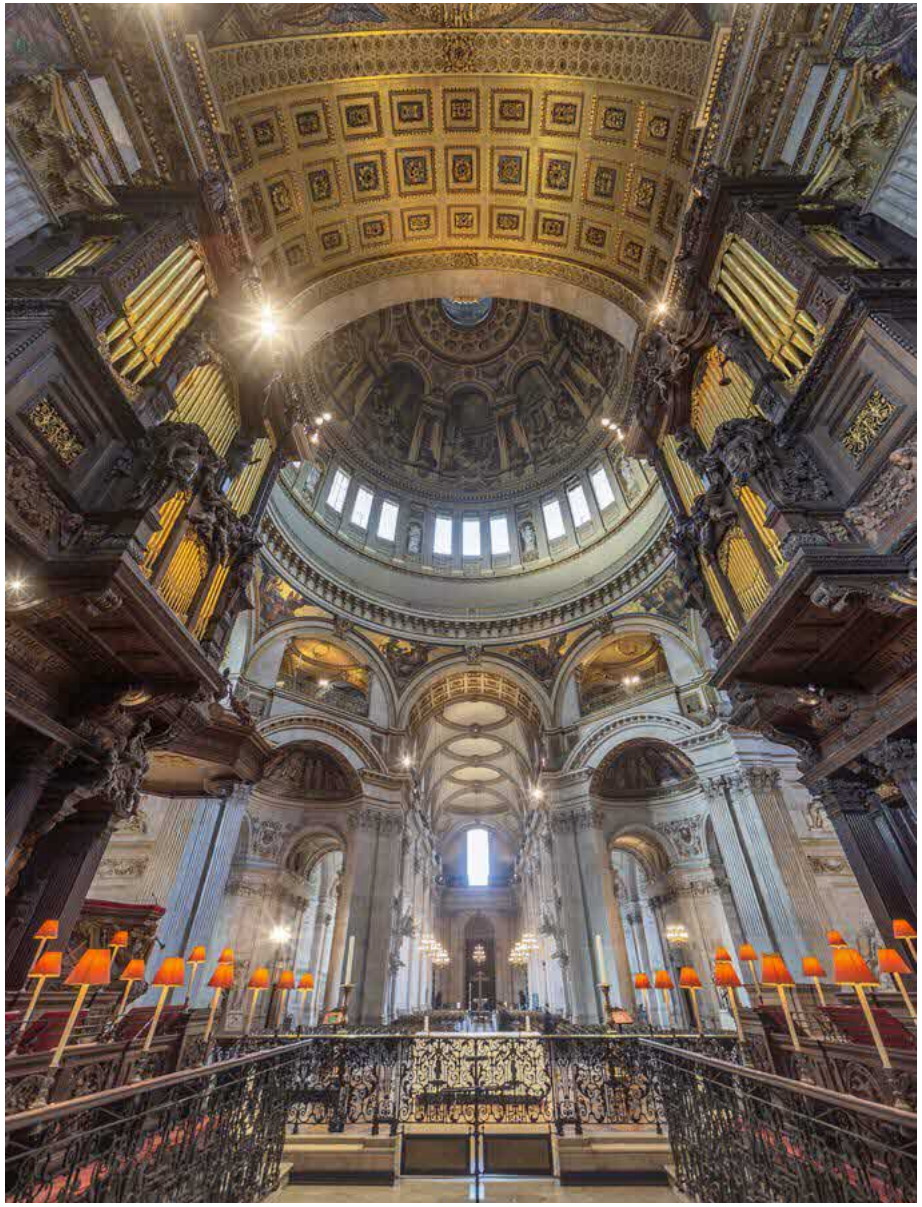
4.2 Sir Christopher Wren, appointed Surveyor in 1672, is regarded as one of England's greatest architects and scientists, and St Paul's is his masterpiece, a building of international architectural importance. In his design, Wren drew on models of early Christian buildings in the Middle East and knowledge of Renaissance and Baroque churches in Europe. This architectural style was a revelation but also a cause of controversy, because it was novel for an English cathedral. The outstanding geometry and structural achievements that underpin the distinctive drum and dome and the iconic silhouette of the dome and west towers have become internationally recognised.

4.3 Through such physical, spiritual and historical prominence, the silhouette of the Cathedral has become embedded in the consciousness of London and the country as a powerful symbol of identity and belonging.

Architectural significance

4.4 The architectural significance of the building, which is regarded as the pre-eminent ecclesiastical structure in the Baroque style in England, is amplified by the outstanding collection of sculptural decoration on its exterior. It is further enhanced by the associations, architecturally, visually, culturally and intellectually, with Wren's other great achievements in London, particularly the Royal Hospitals at Chelsea and Greenwich, The Monument and the City Churches, whose spires provided a delicate, almost romantic counterpoint to the might of the Cathedral on the skyline of London for over 280 years.





The nave and crossing of St Paul's (picture credit: St Paul's Cathedral)

Historical significance

4.5 The historic significance of the Cathedral is central to its status and importance and has been from the time of its first inception. Maintaining the long-established tradition of Christian worship on an elevated site in the City of London, the Cathedral also symbolised the rebirth of the capital, signalling its place as one of the great European cities. The intended symbolism of the building as a representation of the union of Church and Crown was achieved through its position, scale and ornament. It was historically intended to be the principal building in London and one to which the nation could turn in times of celebration and crisis.

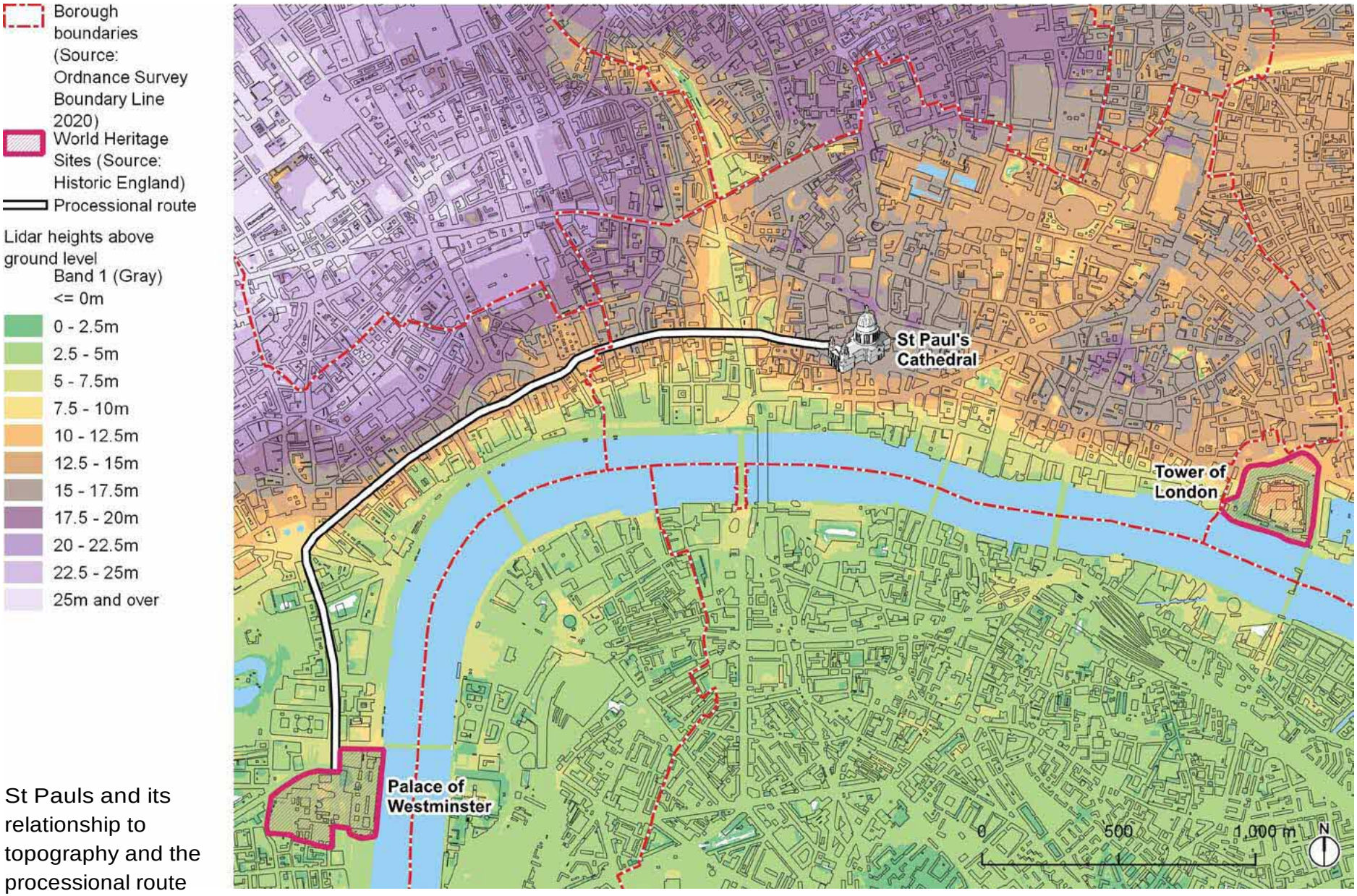
4.6 Those moments of crisis and celebration include the attacks on the fabric of the building by those recognising its symbolic importance and who sought to undermine and diminish it. These included the Suffragettes in the early 20th Century and most infamously, the Luftwaffe during World War II. The commemorative and celebratory roles of the Cathedral include providing the resting place for national heroes including Nelson and Wellington, as well as being the venue for Royal celebrations and services of thanksgiving. The processional route from the City of Westminster, along which monarchs progressed to be formally greeted and admitted into the City of London at the west door of the Cathedral, is an outstanding element of the setting with origins dating back to the time of old St Paul's and beyond.

Cultural significance

4.7 The cultural significance of the Cathedral is wide ranging and includes the role it played in debates and discussions about the Post-War reconstruction of the city and as the venue for the launch of the Festival of Britain which signalled a determination to create a new future for the Country. In popular culture, the fame, symbolism and iconic form of the Cathedral has seen it appear in numerous works of literature, film, television, advertising and the visual and performing arts. Through these many depictions, such as Mary Poppins and the Thames TV logo, and as perhaps the most famous image of British defiance in World War II, millions of people have come to feel that they know the building even if they had never visited it. This "virtual" knowledge and recognition extends internationally, and the silhouette of the dome and towers continues to be used in advertising material by the likes of Transport for London and Visit London, who list it second amongst the best buildings for architecture in the capital. Such recognition contributes to the wide appeal of St Paul's to visitors, over a million of whom visited the Cathedral in 2022.

Further analysis

4.8 Chapter 8 (p.36) explores the history and significance of the Cathedral in more detail. Sections 8.11-8.14 helpfully break down the components of the Cathedral's significance as bullet points.



St Pauls and its relationship to topography and the processional route



5.0
Contribution of setting to the Cathedral's significance

5.1 When built, St Paul's could be experienced, and was intended to be experienced, across the whole of London and, therefore, the whole of the capital was within its setting. The ability to appreciate the interaction of topography, the city and the Cathedral was central to the experience of the building.

5.2 The current setting of the Cathedral continues to extend over considerable distances. It makes a major contribution to the exceptional national and international significance of the building and to people's ability to appreciate that significance.

5.3 That ability is often described in visual terms, particularly when considering the wider setting, but it is also shaped by other environmental considerations and important intellectual and cultural associations. The three main contributory factors are:

- The geographic setting of the Cathedral, which is the capital and the topography of the 'London Basin', ringed to north and south by higher ground, so that the building can still be appreciated from considerable distances.
- The River Thames, historically the main artery for trade and transport both approaching and within the capital.
- The experience of the Cathedral within the City of London as a place of worship, venue for national events and visitor attraction.

5.4 These factors combine in ways that are fundamental to St Paul's significance and how the building is experienced today, as set out over the page under these four headings:

- Elevated topography of the Cathedral
- Clear skyspace
- The river corridor
- St Paul's Churchyard

SB1: The key elements of the setting of St Paul's and their positive contribution to its heritage significance

Elevated topography of the site contributes to:

- The historic interest of the symbolism of the building as the highest point in the City of London and connections to its predecessors on the site.
- Enhancing the intended visual prominence of the architectural design including its scale.
- Enabling appreciation of the architectural composition above the river corridor.
- Emphasising the architectural drama of the western towers and west elevation when approached from the west, which is integral to the Baroque style.
- Enabling an appreciation of St Paul's Cathedral in combination with and alongside other heritage assets.

Clear skyspace contributes as:

- The optimum condition for appreciating the architectural composition and forms of the Cathedral, including the silhouette of dome, western towers and overall composition of the upper parts of the building, which is significant both architecturally and culturally.
- It enhances and ensures visual prominence and therefore the intended architectural effect.
- It enhances the dynamic impact of the Baroque west towers in the round.
- It allows an appreciation of the magnitude and scale of the Cathedral, including when appreciated at a distance.
- It is significant to the understanding and appreciation of the relationships of St Paul's with other heritage assets with a skyline presence, in particular the spires and towers of the City Churches and The Monument which amplifies the significance of the Cathedral.

SB1 cont.

The river corridor contributes to:

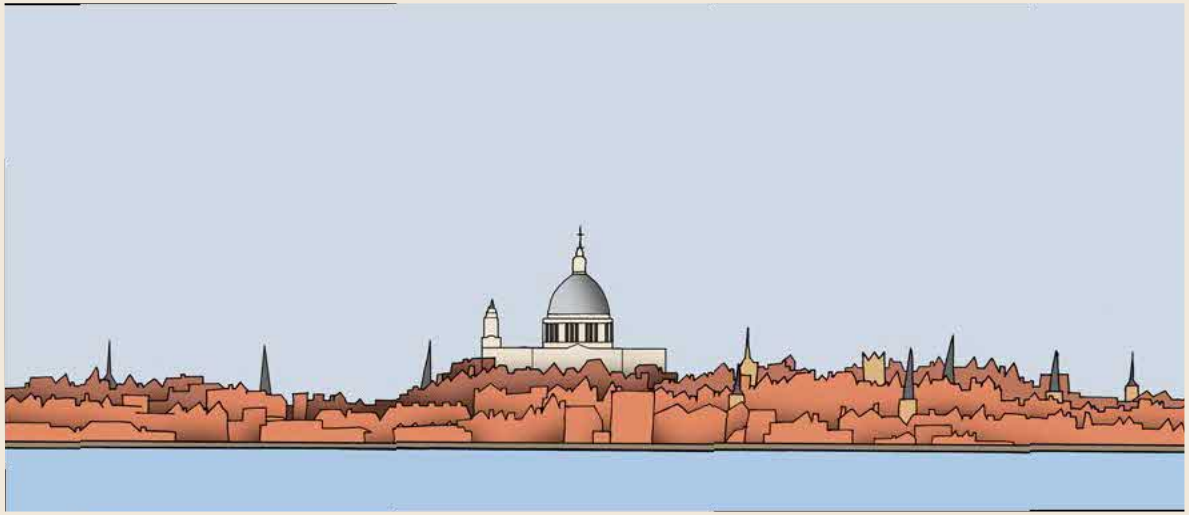
- An appreciation of the scale and visual prominence of the Cathedral.
- Illustrating the historic dominance of the Cathedral in, historically, the principal approach to the capital along the river from the east.
- Understanding of how the Cathedral was built by using the river for transporting construction materials and disposing of construction waste, and the associated relationship with St Benet Paul's Wharf.
- An appreciation of the architectural, visual and historical relationship between the Cathedral and the City Churches.
- An appreciation of the relationship between the Cathedral and the City of Westminster and London to the west, and providing visual connections between these.
- Making connections with artistic representations of the Cathedral usually depicted from the south and west with river in the foreground and, in particular, the views painted by Canaletto.
- An appreciation of the architectural and cultural significance of the Cathedral though a kinetic experience of the Cathedral in its wider urban context, from the water, the bridges or the south bank.

St Paul's Churchyard or close setting contributes to:

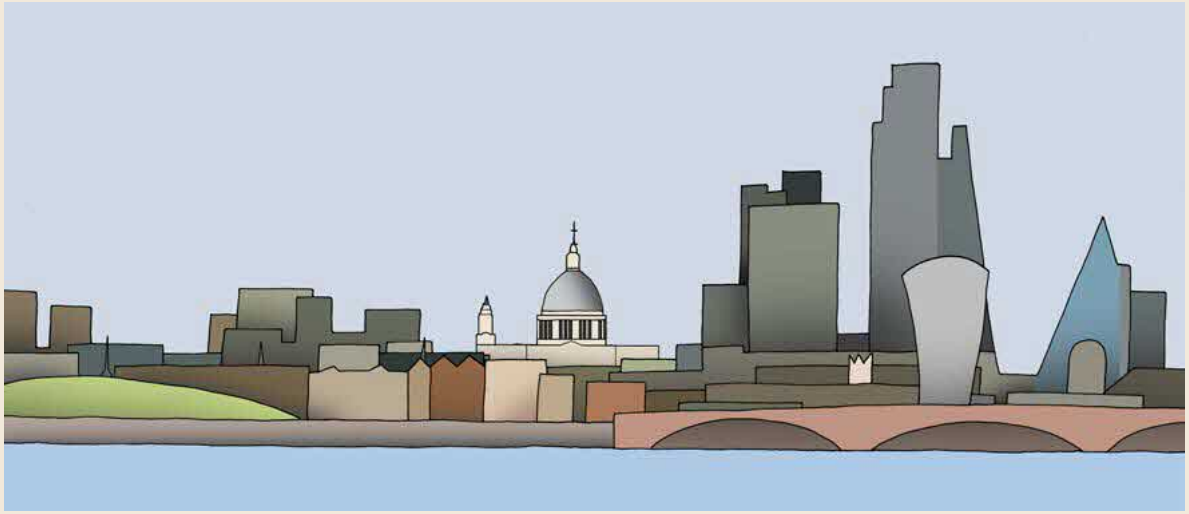
- Experiencing and understanding the architectural scale and composition of the building at close proximity as it towers above you.
- An appreciation and experience of the high quality of architectural detail and decoration including the iconography.
- The cultural importance of the Cathedral, in particular the part played by the west entrance and steps in London's cultural and ceremonial life.
- The culmination of the ceremonial route which is integral to the role of the Cathedral historically and culturally.
- The designed connection with the river over the Millennium Bridge which enhances appreciation of the architectural significance and an understanding of the historic river connections of the Cathedral.

St Paul's changing setting: an illustrative diagram

These sketches illustrate how the close and intermediate setting of St Paul's has evolved since its construction:



As designed by Wren, the Cathedral above aisle level rose clear above the city, and its monumental Portland stone form contrasted with the red-brown brick and tile-roofed buildings of the city. These buildings were of similar height and, through the narrow plots and spans, pitched roofs and chimneys, created a roofscape of finely-scaled texture from which the stone and lead spires and towers of the City churches emerged as delicate vertical counterpoints to the Cathedral.



In the twenty-first century, commercial development has changed this setting in four principle ways: because of the height of new buildings, the Cathedral is no longer pre-eminent; by the agglomeration of plots, buildings in its setting are much longer and wider; through modern materials, the tonal contrast between the Cathedral and the city building stock has reduced; and finally, roofscape forms are now predominantly long planes.



The changing view from Waterloo Bridge, in the 1950s, 2007 and 2024 (picture credits: top left - copyright Historic England Archive; bottom left - copyright Chris Redgrave; bottom right - copyright Historic England)





5.5 PART FOUR: Evidence Base analyses in detail the history of the Cathedral's setting, its evolution and its contribution to setting. It includes a series of summary boxes that encapsulate the analysis in concise form. These are listed here with links. In particular, summary box SB1 and the boxes for the wider, intermediate and close setting (SB9, SB10 and SB11 respectively) are recommended to readers developing and determining development proposals.

5.6 Taken together these boxes provide a robust foundation on which to build greater understanding when carrying out step 3 of the process described in *GPA3 The Setting of Heritage Assets* (Historic England, 2017).

Summary Boxes

SB1: The key elements of the setting of St Paul's and their positive contribution to its heritage significance p.22

SB2: Summary of relationships between St Paul's and the City Churches p.61

SB3: Summary of the relationships between St Paul's and The Monument p.68

SB4: Summary of setting changes from construction until c1800 p.80

SB5: Summary of key changes to setting 1800-1900 p.86

SB6: Summary of key changes to setting 1900-1950 p.94

SB7: Summary of key changes to setting 1950-2000 p.100

SB8: Summary of key changes to setting 2000 to the present p.107

SB9: Summary of the positive contributions of the physical surroundings in the wider setting p.116

SB10: Summary of the positive contributions of the physical surroundings in the intermediate setting p.122

SB11: Summary of the positive contribution of the physical surroundings in the close setting p.131


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6.0 Conclusions

6.1 In the first of his Tracts written during the design and construction of St Paul's, Wren advised the architect:

"... to think his judges, as well those that are to live five centuries after him, as those of his own time"

6.2 He was designing for posterity and seeking in this, his masterpiece, to demonstrate the enduring absolute principles of architecture as he understood them. In order to conserve this element of the historic and architectural significance of the Cathedral some three centuries after its completion we also need to think about how those who live after us will judge our actions.

6.3 Today, the legacy of Wren's intent is the architectural expression of his Cathedral, including the composition and interplay of architectural forms and how these are appreciated from its setting. This is fundamental to the heritage significance of the Cathedral and of great importance when considering the impact of new development on the setting of the Cathedral.

6.4 The Cathedral remains a physical and spiritual landmark for London and for the nation and, although its historical pre-eminence has been eroded by later development, the contribution it makes to the skyline of London is still appreciable, discernible, and distinct. And so its setting remains fundamental to our appreciation of its heritage significance. Consequently, the facets of setting identified in this study, such as the legibility of the Cathedral on the skyline, clear skyspace around it, the elevated position, the role of the river corridor and the building's close setting, all contribute strongly to the significance of St Paul's.

6.5 Therefore, where the silhouette of the major architectural elements remains clearly appreciable as part of the horizon, or against clear sky, any visual obstruction of the Cathedral's outline would cause harm to its significance and any incursions into the sky space around the Cathedral have the potential to cause harm to its significance.

6.6 The pressure from what is often described as minor, or incremental, change is another considerable challenge to the management of the Cathedral's significance, for though individual changes and proposals may have a modest impact, cumulatively such change could cause further harm the significance of the Cathedral. This should be taken into consideration during the development management process.

6.7 By no means has all change to the setting of the Cathedral been harmful, however. There have been changes in recent times which have removed past mistakes and, in addition, taken the opportunities to provide new ways to engage with the building. It is not inevitable that the Cathedral will continue to be challenged or harmed by new development: schemes such as Paternoster Square, Millenium Bridge, and the reflecting pool on the corner of Cannon Street and New Change, demonstrate that change can make a positive contribution to the Cathedral's setting if it is informed by a thorough understanding of the ways in which setting contributes to the significance of St Paul's and the historic environment of the City and London.

6.8 This goes further than simply managing strategic views and the architectural appearance of buildings, it involves understanding how people engage with the building, on a physical, spiritual, emotional and intellectual level, all of which changes over time. How the building is approached and how its relationship to its setting is appreciated from St Paul's itself are part of the foundations for successful future conservation management.

6.9 Such management will require informed and detailed understanding of the Cathedral's significance, its history and the contribution of setting to that significance. That is why this study has been prepared. It is expected that it will require revision as new evidence comes forward. In trying to manage different expectations and aspirations for a study of the setting of the Cathedral it inevitably cannot address every emphasis or nuance that different audiences would wish to see. However, if it does deliver a better appreciation of the special importance of St Paul's then it will have achieved its primary objective.



7.0 Methodology

7.1 It might appear a deceptively simple task to establish what matters about the setting of a historic building and why it matters, but in reality it is a major challenge for somewhere as complex as St Paul's. What matters about the Cathedral is different for different individuals and diverse communities across the capital and beyond.

Guidance

7.2 The approach therefore taken here is based upon the established best practice methodology set out by Historic England in HEGAP 3 *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017).

7.3 The study addressed steps 1 and 2 of the HEGAP 3 approach. In addition, by providing in chapter 9 an analysis of the changes to setting over time it also assists in addressing step 4, which is the exploration of ways to maximise enhancement and avoid or minimise harm when proposing changes within the setting of a heritage asset.

7.4 This study cannot address step 3 of HEGAP 3, which is the impact assessment of a proposed development, but it does provide the foundation upon which the necessary further detailed assessment for step 3 can be carried out for each individual project in the future, as explained earlier in Chapter 5.

Terminology

7.5 The terms "wider setting", "intermediate setting" and "closer setting" are used in the study to help articulate the different characteristics of the setting of St Paul's. The concepts are not based on defined boundaries that can be drawn on a map and they have no formal meaning other than being descriptive. Neither are they hierarchical: the strength of the positive contribution made by an element or feature of setting does not correlate with proximity to the Cathedral, though their nature may be experienced differently depending on distance.

7.6 The study also recognises the clear distinction between setting and views, as set out in the relevant Historic England advice (GPA 3 on Setting and GPA 4 on Tall Buildings). This is discussed further in Appendix 1, p.166.

Research

7.7 The study is based upon professional knowledge of the site and setting gained over several decades, augmented by site visits during its preparation that have focussed upon assessing the current setting. These visits have predominantly been to the closer setting of the Cathedral, although parts of the wider setting have also been visited.

7.8 Site visits were supplemented by examination of a range of secondary sources including academic research and publications and policy, guidance and other material published by Historic England, the Greater London Authority and the Corporation of the City of London. A bibliography and list of sources can be found at Appendix 4, p.164.

Consultation

7.9 The legitimacy and strength of the assessment presented in this study is in large part derived from the extent of consultation on its preparation. A workshop was held on 4 October 2023 to present and discuss the research. It was attended by representatives of the Cathedral, its Fabric Advisory Committee, the Cathedrals Fabric Committee for England, Historic England, the City of London, the Greater London Authority, and independent peer review experts. This group was consulted on a draft and their comments and observations informed the development of the document.

7.10 In April 2024, version 9 of the report was presented to and discussed by Historic England's London Advisory Committee.

7.11 Further review by the City of London and the Greater London Authority is likely and any further comments and observations will inform the final version of the report.

7.12 Beyond that, future iterations of the study would benefit from the results of public consultation, either undertaken specifically for the project or as part of other programmes.

Illustration

7.13 The study contains a range of illustrations, some commissioned specially for the publication, others reproduced from other sources. These include photographs taken by Chris Redgrave of Historic England specifically for the project. Other photographs were taken by the author. Unless otherwise stated, the photographs are the copyright of Barker-Mills Conservation.

7.14 None of the photographs or images are “verified” or Accurate Visual Representations (AVR’s) as defined by the Landscape Institute. They are simply illustrative and intended to assist the user of this document to comprehend the points being made.

Limitations

7.15 The study does not, indeed cannot, provide a definitive statement of significance and how setting contributes to it, not least because of the geographical scale and complexity but also because both are continually evolving and seen through different lens by different communities. In light of the complexity of the asset and the nature of the assessment direct public consultation was not possible.

Author and project team

7.16 Barker-Mills Conservation was appointed to prepare the study. Nigel Barker-Mills, author of this report, has over 40 years’ experience in the management of the historic environment including roles in local government, English Heritage and Historic England. His last role at Historic England was as the Planning Director for London. He is a full, founder, member of the Institute of Historic Building Conservation. Further details of the relevant experience and qualifications of Barker-Mills Conservation are provided in Appendix 5, p.188.

7.17 Alan Baxter Ltd has been extensively involved in the later stages of editing and refinement of the study, including typesetting, graphics and the design of this report.

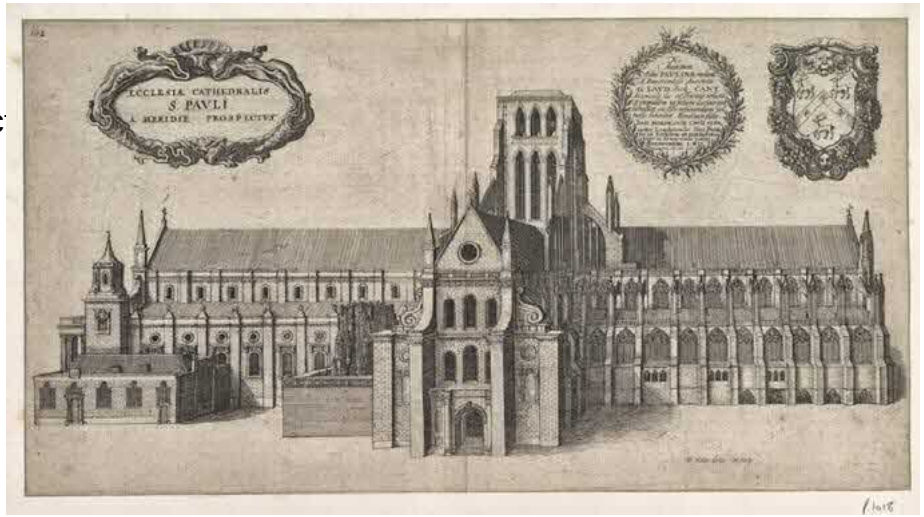
7.18 The project team also includes the Surveyor’s Office of St Paul’s Cathedral, which has provided assistance and guidance during the preparation of this report on behalf of the Dean and Chapter.

PART TWO: Evidence Base



8.0
Heritage significance of St Paul's

8.1 The heritage significance of St Paul's forms the basis for its designation as a Grade I listed building. It is an asset of significant complexity that has been the subject of considerable analysis and description. For those interested in gaining a greater understanding of its chronology, architectural history and archaeology, further sources have been identified in *Appendix NPBM 5*. This assessment is therefore a synthesis of existing analysis and does not set out to be exhaustive.



and St Paul's as amended by Inigo Jones engraved by W Hollar when the spire had been lost

A brief history of the building

8.2 The current building stands on the site of at least two and probably more predecessors. The Normans commenced the rebuilding of an earlier Saxon church in 1087 and construction continued until the later 12th century. The immediate predecessor to the current building, "Old St Pauls" contained within it some of the Norman nave, although encased by Inigo Jones in the 17th century. The medieval cathedral was 12 bays long with a crossing tower and two western towers outside the line of the nave and it stood within a broadly oval precinct. At the time of its completion, it was the tallest building in the capital.

Wren and Old St Paul's

8.3 The first documented involvement of Christopher Wren with the pre-existing building was when he was consulted about its repair in 1661 and he subsequently prepared actual proposals in the Spring and Summer of 1666. Christopher Wren has a strong claim to be England's most famous architect and his genius was recognised from an early age. He came from a prominent Royalist and church family whose members included a Bishop of Ely and was born in 1632, the son of a Dean of Windsor. He died in 1723. His early scientific interest and education led to his appointment as Professor of Astronomy at Gresham College at the age of 25 until 1661, when he was appointed Savilian Professor of Astronomy at Oxford; a post he held until 1673 and overlapping with his appointment as Surveyor General of the Kings Works from 1669. His earlier career was thus in the sciences and he became involved in architecture only later, with his first commissions being the result of his acknowledged abilities and skills in geometry and mechanics. These abilities remained an integral element of his architecture underpinning much of his architectural theory and exploration of the origins of architectural style, both through study but also in his practice.



Old St Paul's: Wren's pre-fire proposals for the crossing © All Souls College, Oxford

8.4 The proposals prepared by Wren in the 1660's for St Paul's were obviously informed by his visit to Paris and the Ile de France the year before when escaping the plague. He never visited Rome but did meet the great Italian Baroque architect Gian Lorenzo Bernini then in Paris working on proposals for the Louvre. In May 1666 Wren submitted a formal proposal for repair of old St Paul's and in August drawings for a new domed crossing to the medieval building were developed; which clearly intended to continue the process of improvement of the old cathedral begun in the 1630's by Inigo Jones. The dome was to provide London with a new landmark in place of the decaying central tower of the existing cathedral which had lost its crowning spire about a century earlier. It was described as a ''rotundo, with a cupola, or hemispherical roof, and upon the cupola, a lantern with a spiring top'' Diarist John Evelyn, one of the Commissioners who supported the proposal, described a ''noble cupola, a forme of church-building not yet known in England'', which he believed would provide a distinction to the London skyline akin to the major Renaissance centres of Europe. For Wren, the use of a dome had greater antecedents to be found in the architectural legacy of "the Levant", (or Middle East) and in particular the model of the early Christian cathedral of St Sophia in Constantinople.

Summary of the construction history of the new St Paul's

1670: First model completed

1673: Royal Warrant issued based on the Great Model

1675: May- Warrant for the "Warrant" designs

1675: July- first foundation contracts issued and the foundations
of Choir and east side of Crossing commence

1676: November transept foundations commence

1678: September Nave foundations commence

1685: Choir and transepts finished to top of lower order

1687-8: Foundations of west end dug and Inigo Jones portico dismantled

1697: First service in the Choir

1698: Dome reaches Whispering Gallery level

1699: Cibber's carved phoenix in pediment of south transept

1700-1705: Design evolution of the west front and towers by Wren and Hawksmoor

1706: West portico completed

1708: Outer dome leaded, western towers completed

1711: St Pauls declared finished

Wren and the new St Paul's

8.5 Following the destruction of the City in the Great Fire in 1666 Wren's first proposal for a new cathedral was indicatively shown on a drawing produced a few days later as part of a proposal for a new City plan. However, it would be a further two years before proponents for the repair and propping up of the existing, heavily damaged structure finally admitted defeat, following a fall of masonry in April 1668, and the need for a new building was accepted. Wren was formally instructed by Dean Sancroft to design that building later in 1668 and by autumn 1669 had reworked his initial, post-Fire proposal into a new design; illustrated by a wooden model completed in 1669/70, a fragment of which survives.

8.6 In 1670 Wren was appointed Surveyor of the King's Works and also appointed Surveyor to the new Commission established to rebuild the city churches also destroyed in the Great Fire. He was not actually formally appointed architect to St Paul's until 1673, by which time he had produced his first model for the new cathedral. This was in the form of a Greek cross, which aspired to the scale and formal architectural qualities of the great Renaissance and seventeenth century centralised churches of Catholic Europe but were, more importantly in light of the Protestant state religion in England, related to the plan form of earlier, ancient examples of monuments in "the Levant" (or Middle East) including early Christian churches. These designs received Royal approval in 1672.

8.7 In early 1673 amendments, in the form of a timber and portico at the west end, resulted in a design which formed the basis of the Great Model. Formal approval by Royal Warrant, the establishment of the Commission and appointment of Wren as architect based on the Great Model design were all completed in 1673.

8.8 Concerns that the plans were not Latin enough and were also at odds with Anglican Church values in the 17th Century resulted in amendments to the design. A radical redesign to produce a building with a traditional Latin cross plan and Baroque silhouette, capable of construction in stages as was traditional for cathedrals, was confirmed by an informal warrant in November 1673 (The "Warrant Design"). However, with the private approval of the King, Wren set about reworking this compromised design and in broadly two phases he reached the basis of the current building. The key change from the Warrant plan was the reduction of the nave from five bays to three, thus balancing the three bays of the choir and reflecting the earlier, centrally planned model. The removal of the proposed spire shown rising from the dome was also abandoned in a "purification" of the form of the cathedral.

8.9 This redesign must have been substantially complete including the extent of the whole building, the transept porticos, the chapels and the diameter of the dome when first building contracts were issued in 1675. Work commenced on the western piers of the dome in 1676.

8.10 No “Approved Design” was exhibited by Wren following the rejection of the Great Model in 1673 and the final form of the cathedral was, to a certain extent fluid; although constrained by the structural decisions that had to be taken at an early stage. The final form of the western towers was not decided until the early years of the 18th Century when Wren was required to show his design for the completion of the Cathedral in February 1700. The date of the official completion of the Cathedral was 1711, some 38 years after the first Royal Warrant was issued for its construction. The “new” St Pauls was the first Post Reformation cathedral in England and the first in a classical style.

Summary of the significance of St Paul’s

8.11 **St Paul’s Cathedral is of special Historic Interest**:

- As the major building completed as part of the reconstruction of the City of London following the Great Fire. It was originally conceived as the centrepiece or node of a planned city and streets, a layout based on continental principals of urban design which was not implemented.
- As the pre-eminent example of a Baroque ecclesiastical building in England completed when the style was at its height in the late 17th and early 18th century.
- For its relationship with the Commission for the rebuilding of the City Churches for which Wren was the Surveyor.
- As a building funded by a dedicated Coal and Wine Tax originally introduced solely for its construction, but later used to fund the Queen Anne Churches and continuing as a tax until the 19th century.
- For the associations with the Post Fire rebuilding of the City of London in which Sir Christopher Wren and Robert Hooke had leading roles; reconstructing many city churches and The Monument.
- For its role in reflecting the contested ideas and liturgical practices of the 19th century.

- For its associations with the highly influential Deans including John Donne, John Hume, Richard William Church; William Inge; Walter Matthew; and Bishops including Howley, Jackson, Tate, Hope, and Chartres.
- For its role in contested ideas about conservation including the replication and interpretation of earlier failed interior paint schemes, including those by Thornhill undertaken in the early 20th century.
- For the number of urban planning schemes designed in succeeding centuries illustrating the desire to make St Paul's the focal point of views from the south bank and the river itself.
- For the survival of the Cathedral including bomb attacks by suffragettes in the early 20th century, Zeppelin attacks in the Great War and more famously during the London Blitz in WWII when it became a symbol of national resistance.
- For the role of the Cathedral as another national mausoleum in addition to Westminster Abbey and containing 33 state sponsored monuments including those to Florence Nightingale; John Howard (prison reformer); Samuel Johnson; Joshua Reynolds; JMW Turner; Sir Edwin Landseer; Viscount Melbourne; and Frederic Lord Leighton.
- For the role of the building as the venue for national events, both commemorative and celebratory including royal weddings, jubilees and memorial services.
- As the location of the burial site of Sir Christopher Wren, Admiral Lord Nelson and the Duke of Wellington all in the crypt, Wren's tomb being the first in this location. The crypt also includes the OBE Chapel, spiritual home of the order.
- For the social and spiritual values that have been attached to the Cathedral over centuries.

8.12 **St Paul's Cathedral is of special Architectural Interest:**

- As the work of Sir Christopher Wren one of Britain's greatest architects and a figure of international significance in terms of architecture and science. The building is regarded by many as his masterpiece.
- For containing the work of craftsmen including Nicholas Stone, William Kempster, Edward Pierce, Francis Bird, Caius Gabriel Cibber, Grinling Gibbons and Jean Tijou when first constructed.
- For containing the work of craftsmen including James Thornhill; Alfred Stevens; GF Watts; W.E Britten, C E. Kempe; W.B Richmond; in subsequent adaptations and alterations in the 19th and 20th centuries.

- For its relationship with other Wren classical designs including the City Churches and particularly their towers and spires which amplifies the experience of significance and landmarks.
- For its relationship with the monolithic freestanding classical column of The Monument.
- For the use of expertly selected materials and advancing technology in construction, including Portland stone, the favoured material for rebuilding important civic buildings and structures in London from the late17th century.
- For the scale of the design, designed to be visually dominant and located on the site of the previous cathedral on elevated ground.
- For the reconciliation of the traditional Latin cross plan favoured by the Anglican church with the centralised oriental and continental Baroque plan favoured by Wren, illustrated through documented drawings and the Great Model.
- For the south western tower spiral stairs which are an elegant and structurally daring design.
- For the external design of the drum and dome, the largest of its type in England at the time and regarded as one of the most perfect in the world (*Bannister Fletcher, Summerson and Pevsner)*, Wren drew on models from Rome and Paris and his exploration of ancient architecture.
- For the structural ingenuity of the dome with different internal and external profiles and the use of the concealed brick cone to support the lantern.
- For the internal relationship of the dome, drum and peristyle and in particular the volumes of the architecture below and within.
- For the elegant and dynamic Baroque west towers, and their vital contribution to the cathedral's external design.
- For the acoustics internally including the special acoustic of "The Whispering Gallery".
- For the examples of subsequent alteration and conservation practice and the association with Surveyors to the Fabric including John James (1723-46), Robert Mylne (1766-1811) S P Cockerell (1811-19), C R Cockerell (1819-1852) Francis Penrose (1852-1897) Mervyn Macartney (1906-1931), Godfrey Allen (1931-1956), Bernard Fielden 1969-1977, William Whitfield 1985-1990); and Martin Stancliffe (1990-2011) who oversaw the most recent major restoration of the Cathedral.

8.13 **St Paul's Cathedral is of Artistic Interest:**

- For the external sculptural decoration including in the pediments and crowning figural sculptures, including their iconography.
- For the examples of the craftsmanship of Grinling Gibbons, Francis Bird, Cauis Gabriel Cibber, Jean Tjou, Nicholas Stone, Edward Pierce, William Kempster, John Singer Sarjent, John Flaxman, Rossi, (William) Hamo Thorneycroft and John Bacon among many others.
- For the internal monuments and memorials including the earliest surviving one from before the Fire, that to John Donne by Nicholas Stone.
- For the internal decoration including mosaics in the roof vaults and Thornhill's *trompe l'oeil* architectural painting of the dome.
- For the long history of artists engaged in schemes of decoration, many unrealised but still of national significance.
- For the interior fittings including the Grand Organ case and choir stalls designed by Wren's office and the workshop of Grinling Gibbons.
- For the various representations of the building in art and photography including by Canaletto, John O' Connor, Frederick Goff and John Piper.
- For the artistic programme that continues today with new commissions and installations, including Bill Viola, Hughie O'Donoghue, Richard Kindersley and many others.

8.14 **St Paul's Cathedral is of Archaeological Interest:**

- For the potential remains of earlier occupation of the site not removed by the construction of the Cathedral.
- For the 18th century and earlier fabric of old St Paul's within the structure, the majority of the external stonework and fabric being faithful later conservation, restoration and repair.
- For evidence relating to the construction process of Wren's building both within the fabric and also within the ground around the Cathedral.

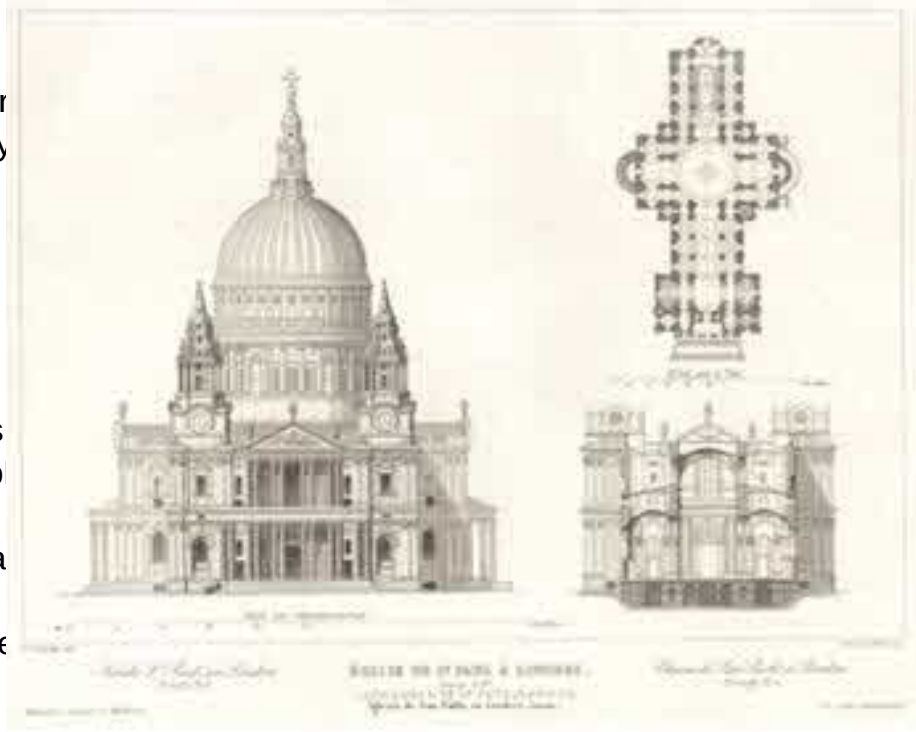
8.15 These interests are the basis for the designation of the Cathedral at Grade I in the National Heritage List for England. Grade 1 listed buildings are a small percentage of the entries on the list and the conservation of their significance attracts the greatest weight under Government policy as set out in the National Planning Policy Framework. The statutory requirements and policy approach for heritage assets is provided in further detail in *Appendix NPBM 3.*

An analysis of the architectural and historical significance of the design

8.16 The new Cathedral has to be seen in the context of English cathedral building established by the Normans and then developed throughout the medieval period. Only by recognising the place of St Paul's within this context can an understanding be gained of the balance between tradition and innovation which is uniquely represented in this building, which was the first post-Reformation cathedral in the country. It was a tradition that Wren knew well as he had been called in to advise on repair Salisbury Cathedral and alterations to Westminster Abbey in addition to his involvement with old St Paul's.

8.17 The new Cathedral is on an elevated site, albeit only modestly higher than its surroundings, but the highest point in the city of London. It re-used that of its predecessor thereby maintaining a continuity of worship on the site that had existed for over 900 years Elevated sites were often used for cathedrals and notab examples in England include Durham, Lincoln, York, Ely, Carlisle, and Lichfield. The choice of an elevated site ha obvious symbolic benefits in addition to ensuring visual prominence. This visual prominence, along with the scale of cathedral buildings themselves, were powerful means of communicating the importance of their role. The tradition of using an elevated site has continued into the twentieth century with the striking example of Guildford Cathedral, dominating Stag Hill which announced the newly created diocese in the 1930's.

8.18 Another characteristic feature often found in earlier cathedrals is the Latin cross plan providing for procession and ceremonial as well as for symbolically referencing the crucifixion. This plan form allowed for architectural emphasis at the crossing and the western



end, which was usually in the form of towers. Examples include Durham, Canterbury, Rochester, York, Southwell, Ely, Bristol, Chichester, Lichfield, Lincoln, Ripon, and Wells. This again was an area of intellectual interest for Wren and he was involved in designing new west towers for Westminster Abbey; although ultimately, they were constructed by his assistant Nicholas Hawksmoor. The importance of towers for cathedrals and indeed parish churches continued into later centuries and the provision of a crossing tower and western towers is a feature of the later 19th Century cathedral at Truro enabling it to dominate that city despite the minimal elevation of its site adjacent to the river. The form and visual interplay between these elements of the design of a cathedral emphasized its scale, added to the sense of power and authority and incited wonder in the lay communities that used or visited the building. As forms of architectural display, they also provide distinct character and enable unique building profiles to be created that then become easily recognisable and often iconic.

8.19 Wren's St Paul's re-uses the elevated site of its predecessor and in its final design also employs the Latin plan, but Wren was also concerned about the relationship of his new building to its' context as an intended ornament for the capital; in particular to the traditional approach to the earlier cathedral from the west. The west end of the earlier cathedral was the ceremonial entrance for royal processions and providing a suitable western vestibule for this purpose of greeting the monarch and associated ceremonial was to occupy much of the design development for St Paul's in the 1680's. Wren's proposed City Plan of 1666 prepared in the days immediately following the Fire indicated an intention to have the rebuilt cathedral related to this western approach by establishing a formal, straight avenue along the approximate alignment of Fleet Street and terminating in a piazza dominated by it. The Cathedral would be at an important node in the plan with routes continuing to other civic buildings to the east at other nodes in the plan. However, with the passing of the Great Rebuilding Act of 1670, it was clear that the desired formality and rational urban plan that Wren was aspiring to deliver would no longer be possible. But in order to achieve some of the intended effect he successfully petitioned the Commissioners to purchase land adjacent to the north west corner of the historic St Paul's churchyard to assist in opening up the western approach and give sufficient breathing space to the west front of the new Cathedral. In addition, Wren adjusted the orientation of his new building in comparison with its predecessor for structural reasons, but also because by adopting slight shift to produce a north-east-to south-west axis he managed to achieve a more direct alignment with Ludgate Hill which formed the last part of the principal historic approach from the west.

8.20 In section the new Cathedral maintains the tradition of the taller nave and lower, subservient aisles but disguises this traditional massing behind screen walls that also perform a structural function in buttressing the nave and the dome. The screen walls also ensured consistency of architectural expression, and avoided what Wren described in connection with other projects as “an unhandsome Medley” or “disagreeable Mixture, which no person of good Taste could relish”. St Paul’s also follows the tradition of providing architectural emphasis at the crossing and west ends but in the hands of Wren it is these elements of the design, in addition to the screen walls, that are innovative both structurally and architecturally and are exceptional in England at this time. Until the construction of St Paul’s, the use of the dome was not widespread in England in contrast to mainland Europe and certainly, there was none of the significant scale intended for the Cathedral. On completion the dome was the largest in country, one of the largest in Europe and it ensured that St Paul’s remained the highest structure in London until the 1960’s.

8.21 In *Parentalia* the memoirs produced by his son, it is claimed that:

“Thus St Paul’s is lofty enough to be discerned at Sea Eastward, and at Windsor Westward, but our Air being frequently hazy, prevents those distant Views, except when the Sun shines out, after a Shower of Rain has washed down the Clouds of Sea-coal Smoke that hang over the City from so many thousand fires kindled every morning, besides Glass-houses, Brew-houses, and Founderies, every one of which emits a blacker Smoke than twenty Houses.’

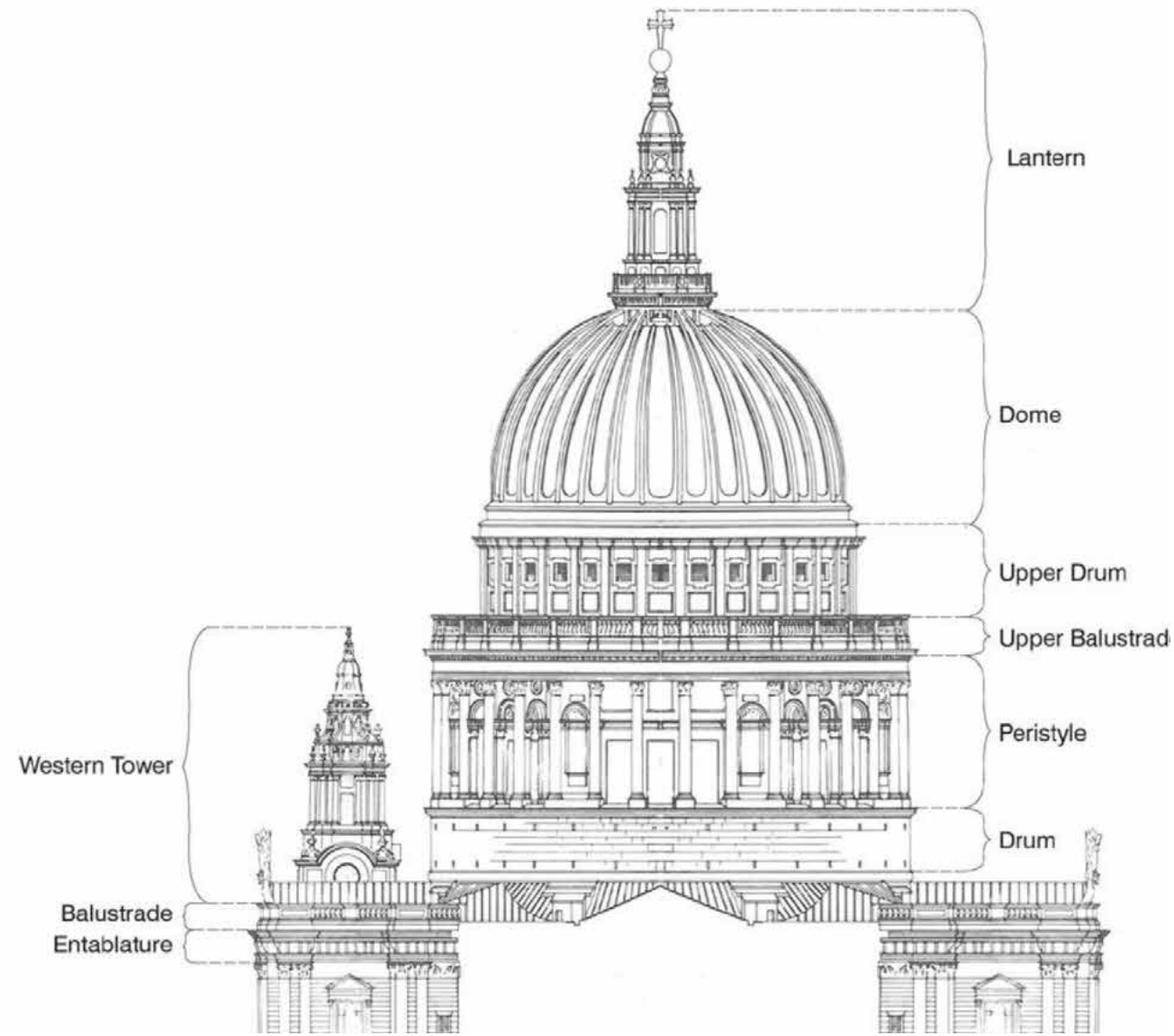
This illustrates that understanding the architectural significance of the cathedral solely through physical experience is and always has been dependent upon environmental conditions which have changed significantly over time. Although it will not of itself be a complete understanding of the intended architectural significance. Some of those conditions even directly affected the appearance of the building as can be seen in photographs of the Cathedral in the 19th and 20th Centuries with its soot blackened lower sections protected by the cornice of the ground floor order from the washing down by acidic rain that resulted in a much lighter colour for the upper sections of the elevation. The understanding of the intentions for the building through an appreciation of its architecture will therefore be different depending upon the distances involved. Broadly speaking at greater distance, the overall silhouette is the most easily appreciated; from intermediate areas of setting the architectural form and massing is appreciable with architectural detail only fully appreciable from within the closer setting of the building.

The dome

"Geometrical Figures are naturally more beautiful than other irregular; in this all consent as to a law of nature. Of geometrical figures, the Square and the Circle are the most beautiful; next the Parallelogram and the Oval."
Wren, Tract 1

8.22 Wren's choice of a domed crossing was not sudden or arbitrary as can be seen by his suggestion of placing a dome on the old cathedral of St Paul's and a dome is a feature in the schematic form of the first new cathedral. It represents an interpretation of early Christian churches as is illustrated in his City Plan of 1666. Throughout the evolution of the design for St Paul's a dome was a central and enduring theme and regarded by Wren as an essential element in making the new building both stately, having more grace in the "remoter aspect" (that is from a distance), but also as a means of conveying its importance in both functional and urban terms. The use and recent development in the design and forms of domes in Europe had been a feature of his recent study in France; although as a member of the Royal Society he and his colleague Robert Hooke had also explored the emergence of the dome as a feature of ancient architecture in the Levant (The Middle East). The structural and mathematical challenges in using such a form must have also have appealed to his scientific interests and the geometrical properties of the dome as a form were also an abiding interest. The geometrical qualities of architecture were, for Wren "the most essential Part of Architecture" and he also noted in his Second Tract that "Geometrical Figures are naturally more beautiful".

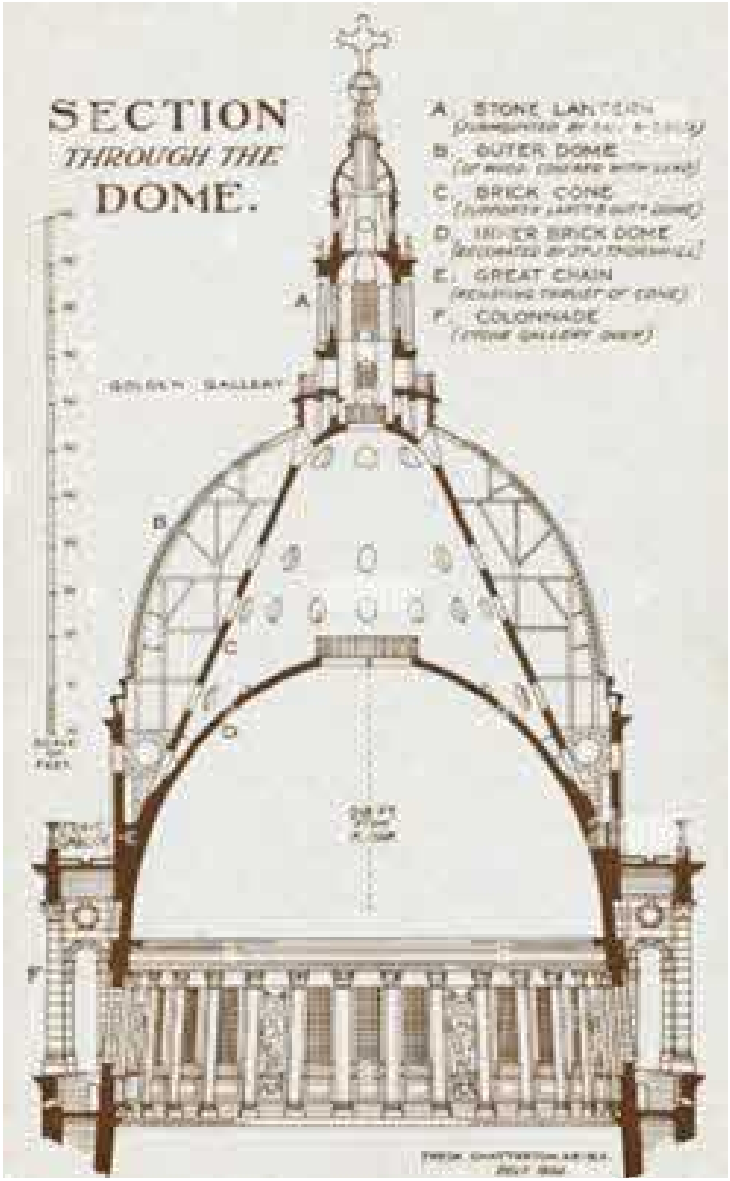
8.23 The continental domes studied by Wren differ from St Paul's although it has been pointed out by Gordon Higgott that the revision to the Warrant Plan which resulted in the addition of the screen walls and larger dome appear to have been influenced by the church of the Hotel des Invalides in Paris by Mansart (1677) which was under construction at the same time. However, unlike those of St Peter's in Rome and the Val-de-Grâce in Paris, the dome of St Paul's rises in two clearly defined storeys of masonry which, together with a lower, unadorned footing, equal a height of about 95 feet. From the time of the Greek Cross design for St Paul's, it is clear Wren favoured a continuous colonnade (or peristyle) around the drum of the dome, rather than the arrangement of alternating windows and projecting columns that Michelangelo had used for St Peter's in Rome and which had also been employed by Mansart in Paris. The peristyle serves to buttress both the inner dome and the brick cone which rises internally to support the lantern, but also provides the large "Basis" upon which the Dome rests. In the finished structure, Wren creates a diversity and appearance of strength by placing niches between the columns in every fourth opening.



The elements of the roof, drum and dome (from the Survey of St Paul's by A.F.E. Poley, 1919)

8.24 Above the peristyle rises the second stage surrounded by a balustraded balcony called the “Stone Gallery”. This stage, the upper drum, is ornamented with alternating pilasters and rectangular windows which are set just below the cornice, creating a sense of lightness. Above this attic rises the dome itself, covered with lead, and ribbed in accordance with the spacing of the pilasters. It is pierced by eight light wells just below the lantern, but these are barely visible. They allow light to penetrate through openings in the brick cone, which illuminates the interior apex of this shell, partly visible from within the cathedral through the ocular opening of the lower dome.

8.25 The lantern, like the visible masonry of the dome, rises in stages. The most unusual characteristic of this structure is that it is of square plan, rather than circular or octagonal. The tallest stage takes the form of a *tempietto* with four columned porticos facing the cardinal points. Its lowest level is surrounded by the “Golden Gallery” and its upper level supports a further, small dome from which rises a cross on a golden ball. The total weight of the lantern is about 850 tons.



Section through the drum and dome of St Paul’s illustrating the structural ingenuity of the crowning feature

8.26 The ingenuity of the structure of the dome has often been remarked upon and it illustrates an important aspect of the design. The brick cone is required not only to support the lantern but is also necessary because the external and internal profiles of the dome itself are deliberately different for architectural reasons. The external profile is created through the use of a timber structure covered in lead that produces a distinctive curve, and is based upon Bramante's design for St Peter's published by Serlio; whilst the profile of the inner dome, constructed in brick, has been carefully considered in relation to the volumes and proportions of the interior spaces of the cathedral and is therefore of a different profile. As described in *Parentalia* the reason for such an approach was:

'….It was necessary to give a greater Height than the Cupola would gracefully allow within, tho' it is considerably above the Roof of the Church; yet the old Church having had before a very lofty Spire of Timber and Lead, the World expected, that the new Work should not in this Respect fall short of the old (tho' that was but a Spit, and this a Mountain) He was therefore obliged to comply with the Humour of the Age, (tho' not with ancient Example, as neither did Bramante) and to raise another structure over the first cupola; and this was a cone of brick, so built as to support a stone lantern of an elegant figure, and ending in ornaments of copper gilt.'

The consideration and care taken by Wren regarding the visual impact of this, the crowning feature of his design, is integral to its architectural significance and central to an appreciation of that significance.

8.27 It is also important to recognise that in addition to its visual effect Wren also had to justify the use of a dome as a way of expressing meanings of relevance to Anglicans by reassuring the Commissioners that it was "proper" in an architectural sense for an English Cathedral, in light of the association of domes with Catholic Europe. Wren emphasised that a dome on St Paul's (as proposed for the old cathedral and carried through to the new design) would become "an Ornament to his Majesty's most excellent Reign, to the Church of England and to this great city". The dome was seen by him as symbolising the national unity between Church and Crown and whilst novel or unfamiliar it would in time become recognised as a national "ornament". In this latter claim, Wren has been proved right.



St Paul's dome from the south east where the plain base, the columned peristyle, the upper drum the dome itself and the crowning lantern can all be appreciated as the central crossing point of the design (picture credit: Historic England).

The west towers

8.28 The towers were constructed from 1705-1708 after publication of the “authorised” engravings of the completed design for the Cathedral in 1702. In that published design the towers are shown as cylindrical in form and clearly based upon Bramante’s Tempietto in Rome. In 1700 construction on St Paul’s was reaching the level of the cornice on top of the church, but it then ceased, commencing again in 1705. Within that period in 1700-1702 Hawksmoor and William Dickenson drew several designs in which the belfries and clock stages of the towers were progressively enlarged. The towers that then emerged, following a further re-design by Wren in 1704-5, are of very different form and character from those in authorised publication. Their height was increased and their structure is organised into three, diminishing stages. Above the main cornice, which unites the towers with the portico and the outer walls, the details are boldly scaled, in order to read well from the street below and also from a distance. The towers rise above the cornice from a square block plinth which is boldly modelled with simple panels flanking large oculi; that on the south being filled by the clock, while that on the north is void.

8.29 The towers are composed of two complementary elements, a central cylinder rising through the tiers in a series of stacked drums and paired Corinthian columns at



The SW Tower of St Paul’s Cathedral (picture credit: Historic England).

the corners, with buttresses above them, which serve to unify the upper drums with the lower stage on which they stand. The entablature above the columns breaks forward over them to express both elements, tying them together in a single horizontal band which is an architectural "device" based on ancient models studied by Wren. The cap, an ogee-shaped dome, supports a gilded finial in the form of a pineapple. The vertical emphasis of the towers is provided by the columns and buttresses and enhanced by the urns and finial decorations placed above them, all of which present a lively profile and character that contrasts with the stately character and simpler silhouette of the central dome. The three features, towers and dome, appreciated together illustrate the evolution of Wren's design approach which included testing architectural conventions and they therefore provide an important understanding of the architectural significance of the building.

8.30 Equal care was paid by Wren to the silhouette of the main body of the cathedral which was designed with the cornice containing brackets as the horizontal, terminal feature. The addition of the balustrade above the parapet in 1717-19 slightly weakens the intended expression of the transept pediments and the silhouette of the building and was built against the wishes of Wren. In a letter to the Commission on 28 October 1717 the then 85-year-old Surveyor objected to the principle of a crowning balustrade, which he described as being "contrary to the principles of architecture, and as breaking into the harmony of the whole design" before famously remarking, '*ladies think nothing well without an edging*'.



West front and towers "elevated" view

Elevations and west front

8.31 The function of the western end of the cathedral was as the ceremonial “vestibule” leading to the Nave and subsequently the Choir. The importance of this section of both plan and elevation is indicated by the fact that of the surviving design drawings for the Cathedral fabric prepared between 1675-1710 about a third (80) relate to the west end. The intention from an early stage was to provide spaces on ground and first floor north and south of the central entrance. The precise form of the spaces evolved alongside proposals for the treatment of the western portico which included the use of giant columns and a re-interpretation of Jones’ earlier portico before the two-storey form was settled upon. The uses of the spaces included a library, the trophy room and chapels on the ground floor. The west front is strongly articulated with the lower portico comprising 6 pairs of Corinthian columns. The intercolumniation is subtle, with the central space wider than those flanking to emphasis the central axis of the design. The upper, pedimented portico follows a similar spacing but using Composite columns. The porticos are framed by the outer rusticated lower stages of the towers separated by a narrower bay either side. The paired pilasters to the outer bays are surmounted by the statues of the Evangelists. The simple geometry of the square bases of the free-standing towers containing the oculi under strongly expressed segmental cornices is readily appreciated above and their geometry complements that of the dome when seen in combination. The strongly expressed depth of the central porticos with their deep shadows and modelling contrasts with shallower modelling of the elevations either side characterised by the rustication and decorative cornices and swags.

8.32 There is a similar contrast to the depth of modelling to the north and south transepts with the semi-circular porticos projecting boldly and their modelling echoed by the drum of the dome above. The extensive surface rustication is balanced with concentrated areas of carved decoration including in the spandrels of the arched windows on the ground floor that form, in effect, a continuous horizontal band of foliage decoration. This band incorporates the capitals of the lower orders across the façade. This arrangement is repeated above but with added emphasis created by the vertical garlands of foliage and fruit either side of the main transept window and crowned by the sculpted pediment and free-standing statues above.



South Transept and Portico from Carter's Lane: note the strongly expressed semi-circular form of the portico and the rich decorative carving in bands across the ground and first floors. The statues crown the vertical articulation of the façade organised by the Corinthian and Composite pilasters usually paired (Picture credit: copyright Historic England).

The sculptural decoration and its iconography

8.33 The architectural sculpture of the Cathedral is often overlooked in comparison to the appreciation of the dome, porticos and towers of Wren's design. However, collectively, the architectural sculpture is one of the greatest ensembles of the English Baroque. The west pediment contains the *Conversion of St Paul* by Francis Bird (1706) which is a dramatic composition clearly informed by Italian, Baroque examples. Bird was also responsible for the reliefs depicting scenes from the life of St Paul around the west door.

8.34 In 1718-21 statues were added to the elevation of the west front. At the lower corners of the two towers are the Evangelists with their associated symbols, all of whom are depicted as seated and writing in books. On the pediment between the towers are three standing statues, St Peter on the north, St Paul to the centre and St James to the south. A further five statues were added to the north transept in in 1720-4 depicting St Barnabus, St Philip, St James the Less, St Jude and St John the Baptist. Five statues were also originally placed on the south transept although the three central ones were replaced in 1898. These were St Thomas, St Andrew and St Bartholomew. At the corners the Bird originals of 1722-4 survived, depicting St Simon and St Matthias. The majority were the apostles of Jesus charged with proclaiming his message and therefore the symbolism of their prominent position on the principal axes of the Cathedral also resonates with the liturgical purpose of the building. St Pauls was one of the first buildings in the City to have groups of statues along its roofline- principally the pediments. These would have originally stood out against a clear sky and formed part of the skyline of the building. They would also have been an unusual and novel feature for a building in the City at this time.

8.35 One element of the sculptural iconography has additional significance which has increased during the course of the subsequent history of St Paul's. In the south portico pediment is the phoenix carved by Caius Cibber as a symbol of resurrection following fire. It is reported that when Wren was on site at St Paul's to draw out the circular dimensions of his dome, he sent a workman to find a piece of stone to mark the centre of the figure and he returned with a piece of tombstone upon which the word Resurgam! (I will rise again) was carved, thereby inspiring the subject of the decoration in the pediment. In light of the subsequent attacks on the Cathedral including by suffragettes, in the two World Wars and those subsequently planned by terrorists, the concept of resurgence has become particularly attached to this cathedral.



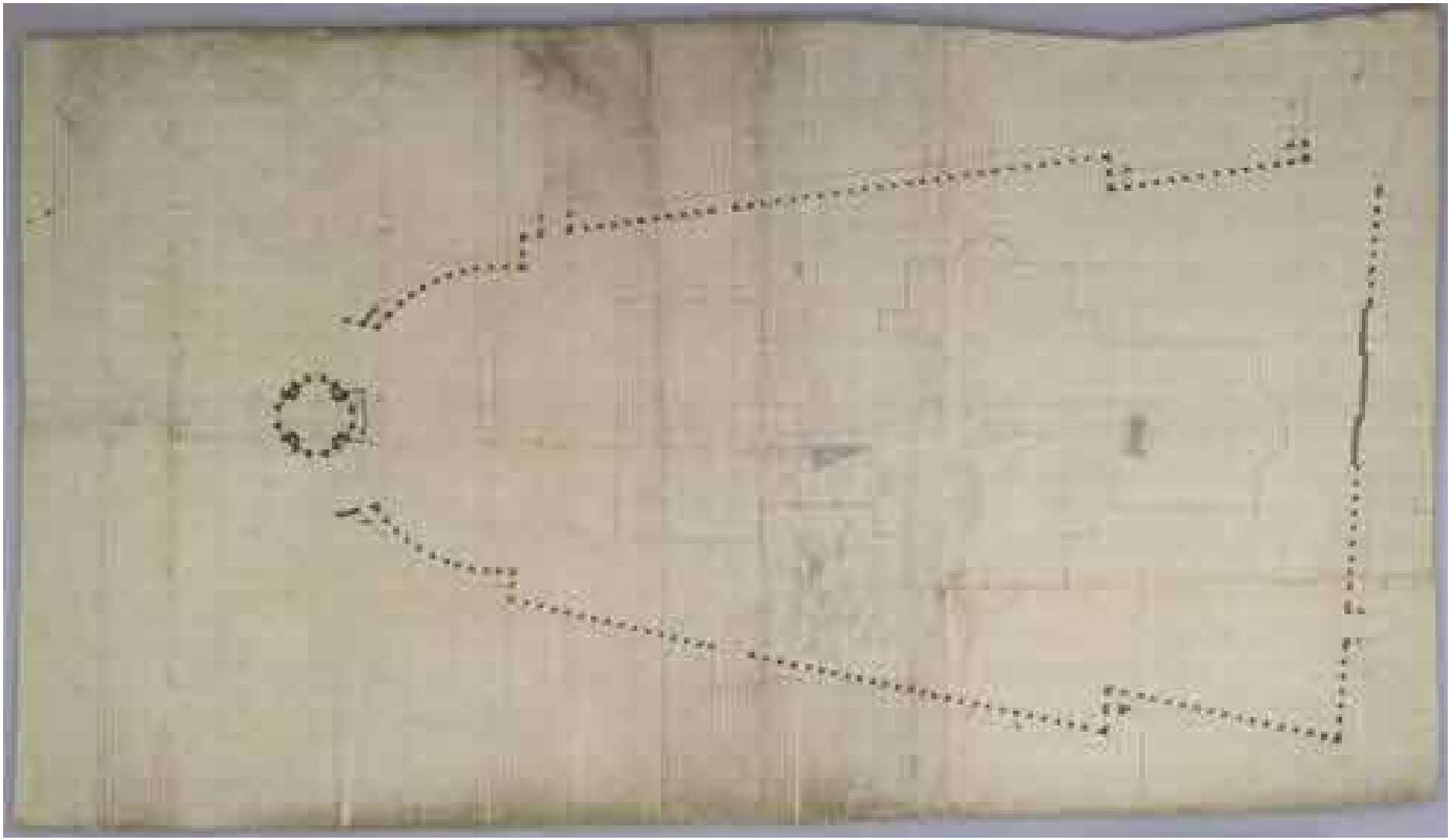
The Phoenix and Resurgam in the South Portico Pediment by Cauis Gabriel Cibber (picture credit: copyright Historic England).

St Paul's Churchyard: the close setting

8.36 The earliest known scheme to improve the Cathedral churchyard is an outline study by Wren and Hawksmoor, drawn over a survey of the whole precinct prepared by William Dickinson soon after he joined the Surveyor's office in 1696. Sketched loosely in pencil – probably by Wren – are the lines of curving frontages on the north and south sides which narrow to a circular space on the west, where Ludgate Hill meets the churchyard. Within this space is a large rotunda on axis with the Cathedral. Hawksmoor redrew the outlines in ink, including with what appears to be a colonnade, to give the piazza a symmetrical, wedge-shaped plan, and also drew the whole plan separately to show the rotunda with internal apses and a grand staircase on the east side. The churchyard scheme – previously dated around 1710 – must have been prepared before the north and south transept steps were built to modified plans in 1698–99 because the completed steps disrupt the overall symmetry of the ground plan and were first shown in engravings of 1701.

8.37 The Building Committee's earliest discussions about the churchyard in 1701–03 were restricted to the removal of two blocks of houses on the north side of the nave. Clearing these houses in 1710 allowed the construction of the churchyard railings. Railings were a new feature in the City at this time as there were no known railings on pre-Fire buildings and they were part of the innovative features that characterised the Cathedral. Wren had proposed several separate railed enclosures around the Cathedral in wrought iron, including one for the statue of Queen Anne (completed in 1712) on the west side. However, in January 1710 the Commission rejected Wren's scheme in favour of a more extensive enclosure bounded by larger, cast-iron railings. The revised scheme drawn by Dickinson in 1709 shows railings in a straight alignment along the north side of the churchyard which then curve around the east end of the Cathedral in close proximity to the apse. The railings along the southern boundary of the precinct are shown attached to the outer walls of the south transept before continuing to create a curved enclosure to the west of the Cathedral with a gate at its apex.

8.38 The great steps at the western end of the Cathedral shown on this plan were of two flights and the landing and lower flight were enclosed by outward-curving walls and railings. These steps were rebuilt in 1872 by the Surveyor FC Penrose, who reverted to an earlier, 1701, plan prepared by Wren. The railings that currently survive, principally along the northern side of the current churchyard are on lower plinth walls and are not in their original positions.



Finished plan of the churchyard by Hawksmoor 1696-7 which illustrates the proposal for a colonnade around the perimeter ©St Paul's Cathedral

The Commission on City Churches and the relationship with St Paul's

SB2: Summary of relationships between St Paul's and the City Churches

Architectural Relationships

- The use of stepped geometrical forms in churches and Cathedral towers.
- The variations on the Baroque style centred on Wren and his circle of assistants and collaborators.
- The shared role of Wren and Hawksmoor as architects for the Cathedral and the Churches.
- The use of Portland stone and lead in both churches and Cathedral.
- The recognition of the architectural effect on the skyline produced by the contrast between the mass and form of the Cathedral silhouette the delicate forest of spires and towers of the churches.
- Use of the same craftsmen and masons including Edward Strong and Nicholas Stone.

Historic relationships

- The role Cathedral and churches make in illustrating the resurgence of London as a new city following the fire;
- The shared importance of re-instating places of worship on their historic sites.
- The appointment of a Commission for rebuilding but with Wren as Surveyor for both.
- The shared source of funding from the Coal and Wine Tax.
- St Benet Paul's Wharf sited originally on the river at the wharf where the material for the Cathedral was landed.

Visual relationships

- The deliberate contrast of scale and silhouette on the London skyline.
- The concentration of the spires and Cathedral illustrating the position of the historic City of London in approaches from the river and the south.

Cultural and intellectual relationships

- The artistic representations of the skyline by Canaletto and others.
- Visitor commentaries and publications highlighting the distinctive contribution that Cathedral and church spires make to the identity of London.

8.39 Alongside St Paul's, the City Churches are Wren's principal contribution to the historic appearance of London and until relatively recently they remained the outstanding accents of the City and enlivened its skyline. At the time of the fire there were 107 parish churches in the City of London of which 85 were burnt. Only 51 were rebuilt following the Fire. The replacements were funded, like St Paul's, from the Coal Tax enacted in 1670 and they received a third of the income generated, which was the same allocation as that for the Cathedral. As Surveyor to the Commission established for their construction Wren was instructed to "*direct and order the dimensions, forms and models of the said churches*" and was supported by Edward Woodroffe and, subsequently, John Oliver. Alongside Wren was Robert Hooke who had been collaborating with him on the designs for The Monument and, on the basis of analysis of surviving drawings, several of the City Churches were probably of his design rather than that of Wren.

8.40 A number of the City Churches were actually being repaired and reconstructed before the Commission could direct their rebuilding so the involvement of Wren in that process would have been minimal. It is also the case that where fabric had survived, Wren was reluctant to demolish it, unless absolutely necessary. Therefore, whilst it is clear that Wren was in overall control of the rebuilding programme, the design of individual examples was often collaborative. The liturgical requirements for parish churches at this time focussed upon the "Auditories" or need to be able to both see and hear clearly. This encouraged the use of galleries and provided opportunities for Wren to experiment with both longitudinal and centralised plans in a similar process to that seen in his design approach for St Paul's.

8.41 In most cases the churches were partly hidden by surrounding houses or faced narrow alleys where architectural display would not have been appropriate, but even the smallest church would have been provided with one formal elevation for show. However, the focus for architectural display for the parish church was the tower or spire, which continued a tradition of City parishes which were proud of their towers and steeples and the bells they housed and therefore required them to be re-provided.

8.42 The towers of the churches were usually square in plan and straight-sided, although there were exceptions. Lower stages would usually have round headed or circular windows but for the bell stage above, straight sided openings could be used. The three major stone towers of St Bride's, St Mary-le-Bow and St Magnus use paired pilasters flanking the bell stage. The addition of a steeples above the tower was often a later consideration and it seems that Wren may have arrived at a vision of a forest of steeples extending across the skyline of London gradually. Of the major steeples, only St Mary-

le-Bow was designed and executed in the first wave of church building (up to 1680) although it was clear that St Magnus and St Bride were designed to have steeples from the start, albeit built slightly later. Wren's office would therefore have been busy designing steeples into the first decade of the 18th Century at the same time a the towers of St Paul's were being designed.

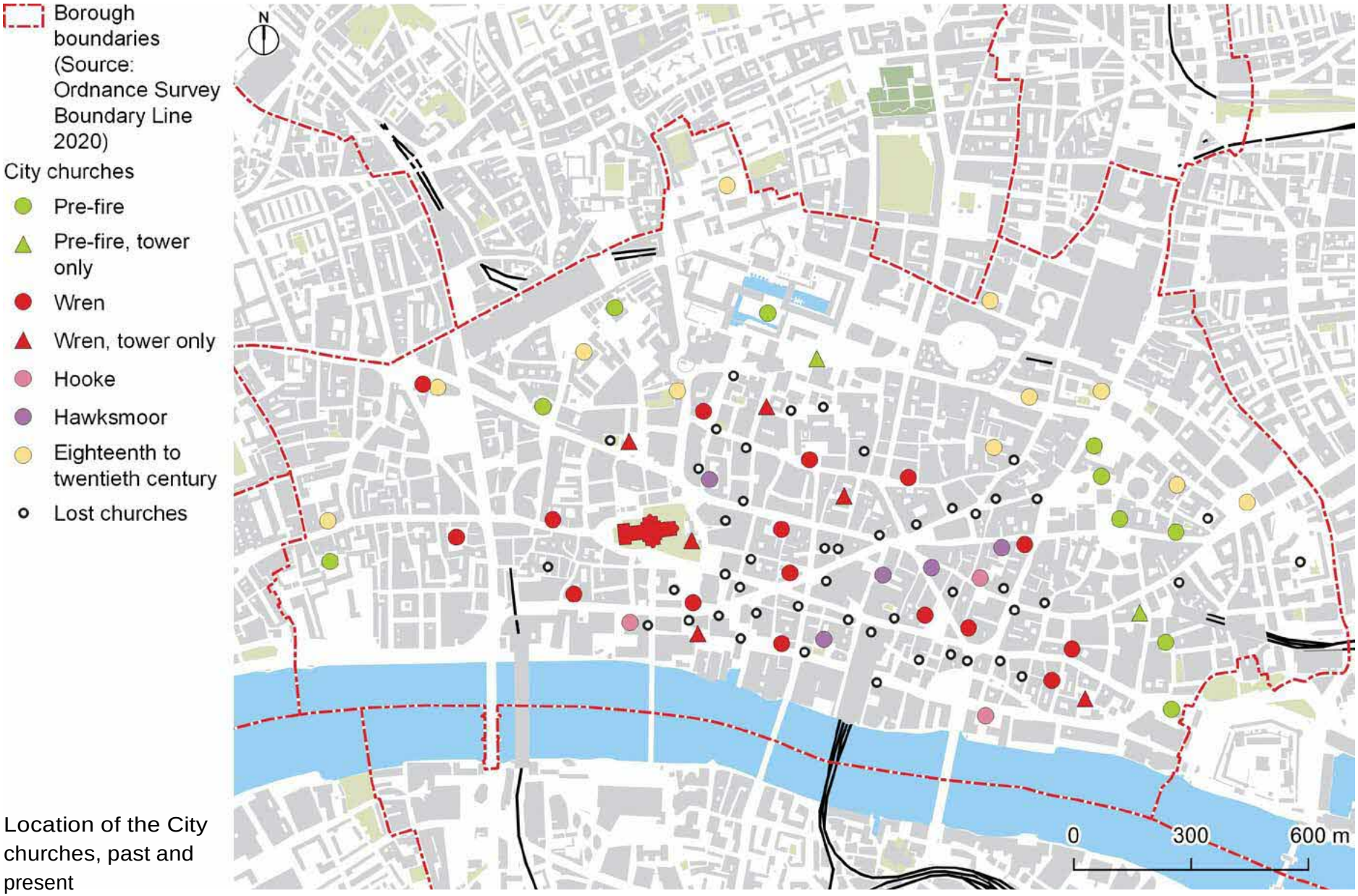


St Paul's Cathedral and city from the South by S and N Buck 1749

8.43 At the time when several of the steeples were being designed and added to the City Churches, Wren would have been busy at St Paul's, the Greenwich Hospital and Hampton Court, so delegation and involvement of others in their design and construction is almost certain. The collaboration would have been with Robert Hooke and also Nicholas Hawksmoor, who worked in the Surveyor's office between 1695 and 1701. Drawings for the steeple of St Edmund by Hawksmoor survive although the steeple was not actually built until 1706-7. This raises the interesting possibility of the extent of collaboration and discussion between Wren and others, including Hawksmoor, on the evolving design of the west towers of St Paul's and their more dynamic Baroque character in contrast to the calmer, High Renaissance character of the dome.

City Churches designed by Christopher Wren in whole or in part

- Christ Church Newgate Street 1677-87 bombed but tower 1703-4 remains
- St Andrew by the Wardrobe 1685-94 (reconstructed 1961)
- St Andrew Holborn survived the fire repaired by Wren 1684-86 tower reclad by Wren and raised 1703)
- St Anne and St Agnes Gresham Street 1676-87 (reconstructed after WWII)
- St Benet Paul's Wharf 1677-85
- St Bride's Fleet Street 1670-84 (interior reconstructed in 1950's)
- St Clement Eastcheap 1683-7
- St Edmund King and Martyr 1670-9
- St James Garlickhythe 1686-72 (Tower 1717)
- St Lawrence Jewry 1670-1677 (Spire is a modern replica)
- St Magnus the Martyr 1671-84 Tower 1703-6
- St Mary Abchurch 1681-6
- St Mary Aldermary 1679-82 (some doubt as to extent of Wren's involvement); tower 1701-4 either Hawksmoor or Dickinson
- St Mary At Hill 1670-74
- St Mary Le Bow 1670-80; Steeple 1678-80 first one erected after the Fire
- St Mary Somerset: 1685-94; only tower remains restored in 1956
- St Margaret Lothbury 1683-92 (Tower 1698-1700 by Robert Hooke)
- St Margaret Pattens East Cheapside 1684-87; tower 1698-1702
- St Martin Ludgate 1677-86 with Hooke
- St Michael Cornhill no Wren involvement but tower by Dickinson and then Hawksmoor 1717-1722
- St Michael Paternoster Royal 1685-94; tower 1713-7 possibly by Hawksmoor
- St Nicholas Cole Abbey 1672-8; reconstructed 1961 and upper tower rebuilt
- St Olave Jewry 1671-79 demolished apart from tower now converted as rectory for St Margaret Lothbury
- St Peter upon Cornhill 1677-84 with Hooke
- St Stephen Walbrook 1672-80; spire 1713 probably by Hawksmoor
- St Vedast Alias Foster1695-1701 (tower and spire 1709-12 possibly by Hawksmoor)



Location of the City churches, past and present

8.44 When Wren and his office were designing the City Churches there was little precedent for classical steeples. Inigo Jones had designed small towers for old St Pauls and at Whitehall, but the idea of replacing the steeple which was a priority for the city parishes, but in a classical form, was a new challenge. St Mary Le Bow on Cheapside was Wren's first invention. The bell stage has paired pilasters flanking simple arched openings, a form he used on the Cathedral and also on other churches. Above, a circular *tempietto* supports bows or arches clustered around a drum which in turn supports a further *tempietto* but of square section. The upper console of the steeple is then crowned with an obelisk. The Steeple of St Bride on Fleet Street (1702-4) is related to the proposed termination of the crossing in the Warrant Design for St Pauls, which also featured diminishing octagonal *tempietti*. In this steeple there are four stages each with a pilaster order on a pedestal; but whilst the pilasters diminish in height from stage to stage, the pedestals actually increase which achieves the effect of upward lift. The crowning feature is again an obelisk. The third church steeple which is based on designs that had evolved earlier is St Magnus the Martyr. The steeple constructed in 1705 also has the square bell stage with paired pilasters, but above an octagonal *tempietto* on a simple base is crowned with an ogee dome and spire. These three steeples were contemporaneous with the design and construction of the west towers of St Paul's Cathedral.



St Mary-le-Bow 1678-80



St Brides1702-4



St Magnusthe Martyr 1705

8.45 The knowledge that the great Cathedral and the towers and spires of the City Churches were evolving and emerging in parallel adds to an understanding of their significance. In particular the architectural questions regarding the single authorship of an architect, as opposed to collaboration. The role this had in the development of Wren as a Baroque architect is central to the special interest of these buildings. This is in addition to the architectural impact on the skyline of London created by these buildings which became famous across Europe. Visitors were struck by the delicate “forest” of varied steeples and towers as a counterpoint to the might and repose of the dome of the Cathedral, the mother church of the diocese. Being able to actually appreciate these features and see this symbolic and functional relationship between a cathedral and so many of the parish churches within its diocese was unique in the English context and the result of the compact nature of the historic city. Only 24 of the 51 churches rebuilt by Christopher Wren’s office after the Great Fire of London remain; many have required extensive restoration.

The Monument and its relationship to St Paul's

SB3: Summary of the relationships between St Paul's and The Monument

Architectural relationships

- Both structures originally planned as part of new urban layout based on continental models in the Baroque manner.
- The use of architectural scale for effect; both the tallest structures of their kind when built.
- Classical architectural language.
- Both constructed of Portland stone.
- Designed by Wren and Hooke who worked together on the City Churches and were on the Commission for Rebuilding together.
- Architectural decoration and reliefs designed and executed by the same craftsmen.

Historical relationships

- Both symbols of the reconstruction of the City as well as commemorating its destruction.
- Both symbols of the commitment of the monarch to the future of the City.
- Both drawing on precedents and associations from ancient empires and architecture.
- Both used the river for the transport of materials for construction.
- Both new building types in a national context.

Visual relationships

- Intended visual dominance of the skyline of the City.
- Intended visual relationships with the spires and towers. of the City Churches.
- Both structures had viewing galleries and were intended to provide views to and from each other amplifying their symbolic roles.

Cultural and intellectual relationships

- Illustrations of the intellectual relationships between Wren and Hooke as men of science and members of the Royal Society.
- The use of both structures for scientific experiments and purposes.
- The use of ancient precedents for design and the intellectual associations with those precedents.

8.46 The Monument to The Great Fire was designed by Robert Hooke appointed Surveyor to the City of London and chief assistant to Christopher Wren. The Monument served a dual purpose. In addition to commemorating the disaster and celebrating the new city that rose from the ashes of the old, it was also designed to be a scientific instrument. The column was a giant Zenith telescope enabling experiments with gravity and pendulums with a small laboratory below ground. It is sited on Fish Street Hill, c200 feet from the site where the Great Fire originated in Pudding Lane and was started in 1671, taking six years to complete (1677) partly due to difficulties in obtaining Portland Stone in the required dimensions for the structure but also because safe transport of the materials was difficult because of the Anglo-Dutch War of 1672-4. The manner in which The Monument was set within the city reflected a key concept of Wren's Plan for London where important buildings were placed on main junctions and given space round them. The Monument was built on the border of an existing road which led directly from London Bridge and to the other side was a square, originally larger than the current urban space. Both St Paul's and The Monument therefore share the same significance in illustrating the approach of Wren to city planning.

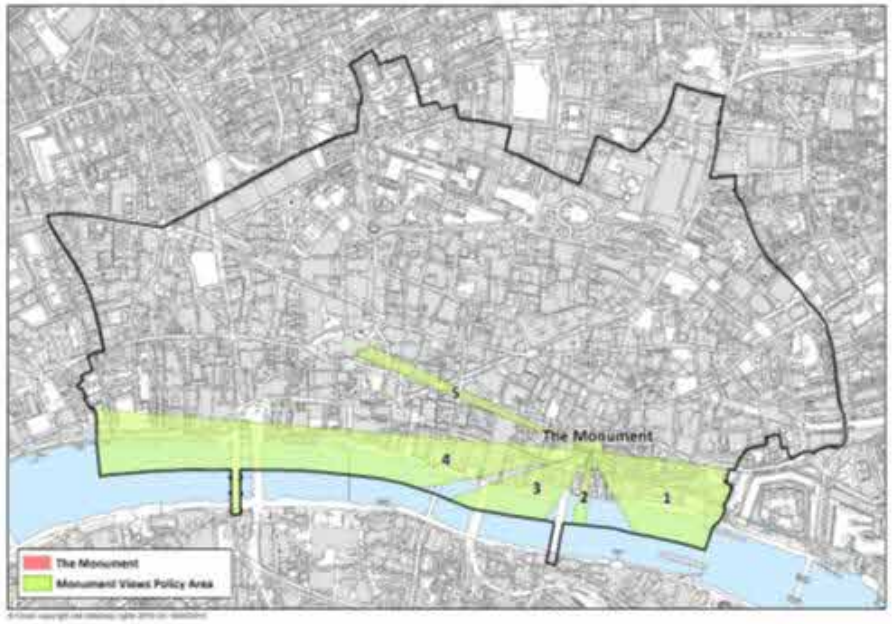
8.47 In addition to sharing common materials, transported by river and landing at St Paul's wharf, both structures were decorated by the same craftsmen and sculptors. The decorative panel on the west face of the base of The Monument was carved by Danish sculptor Cauis Gabriel Cibber, who was responsible for the Phoenix on the south pediment of St Paul's Cathedral. The bas relief depicts both the past (the Great Fire on the left) and the future, the reconstruction of the City on the right.



Sitting on broken masonry in the bottom left corner, holding a sword, is a female figure, who represents the City of London. She sits above a dragon, which has been the symbol for the City of London for centuries. Standing behind her with wings is Father Time, helping her back to her feet. He also has the help of Mercury, representing Industry, who is holding a caduceus, a decorated staff that is the symbol of trade, commerce and negotiation. On the right is a group of figures, the central and most prominent is King Charles II dressed as a Roman Emperor with a baton of command in his right hand. He gestures towards the personification of Architecture, who's holding a square and compass in her left hand, and the plans for the new City of London in her right. Liberty stands behind Architecture, watching, and holding her cap bearing the word Libertas.

8.48 The Monument is a rare, pre-Georgian example of public commemoration and a rare example of a colossal colum in Britain at the time, which inspired a building typology that was subsequently adopted in following decades and centuries. Later examples include the Column of Victory monument to the Duke of Marlborough at Blenheim (1727-30); the memorial to Charles, 2nd Earl Grey in Newcastle upon Tyne (1838); Nelson's Column (1840-43); and the Elveden War Memorial column in Suffolk, dedicated to the fallen of the villages of Elveden, Eriswe and Icklingham (1921). It remains the tallest isolated column in the world.

8.49 Both St Paul's (in particular its dome) and The Monume were novel and the first structures of their type in the country and therefore a source of interest. They were both an attraction to visitors from the time of first construction and both included viewing galleries from which to survey the city. Both were designed to have a visual presence across wide sections of the Capital and that visual prominence was central to their role. This historic role and relationships have been acknowledged in specific policy guidance (*Corporation of London Monument Views Study SPD December 2020)* and the area covered by the policy incorporates and overlaps with important parts of the setting of the Cathedral.



The Monument Views Policy Area from the Views Study SPD December 2020

The history of the Cathedral following completion

8.50 St Paul's became the most talked about ecclesiastical building in England following its completion in the early 18th Century. From about 1720 maps were produced that had the Cathedral as the central point in London, and from 1676 until the 1790's St Paul's was taken to mark the meridian of the whole world before this was transferred to Greenwich. From the time of its completion the building was also a tourist attraction for foreign visitors and five parts could be viewed at a charge of 2d per person for each one. These were the Golden Gallery, the Whispering Gallery, the Library, the Great Model and the Geometric Stair. The architecture of the building was less influential in other British and European cities with the notable exception of the dome, which in 1776 was measured by a pupil of the architect J.G. Soufflot. There is, consequently, a clear relationship with the dome of St Paul's and Soufflot's subsequent design of the Pantheon in Paris of 1791.

8.51 However, for much of the 18th century the Surveyors to the Cathedral after Wren were mainly concerned with structural settlement, some of which was to be expected for such a large building that had been constructed in a comparatively short time. The interior of the Cathedral remained comparatively bare for much of this time with religious activity largely confined to the choir; this contained the pulpit with the Bishop's Throne located opposite. The Nave and transepts were used for special occasions but otherwise the main activity in these spaces was sightseeing by visitors.

8.52 It was only in the latter decades of the 18th Century and then the early years of the 19th Century that the Cathedral became identified as a suitable mausoleum for national heroes, originally those with a military or naval background. The introduction of commemorative tablets and effigies commenced in c1790 and included wall panels to those heroes who fell in the War with France from 1793. A significant turning point was the decision to choose St Paul's as the burial place for Admiral Lord Nelson, in 1809. His body was brought up the river by state barge and his coffin and bier were then theatrically lowered through the floor of the nave beath the dome into the crypt below. This arrangement was repeated for the funeral of the Duke of Wellington in 1852 whose body was brought on an enormous funeral carriage that required a wide opening in the railings to the cathedral, which was itself filled with temporary wooden galleries to accommodate the vast audience. The third notable state occasion in the 19th Century was the thanksgiving service for the Diamond Jubilee of Queen Victoria in 1897. She remained in her carriage outside the west end of the Cathedral and temporary stands were constructed in the portico and across the west end of the Cathedral for the audience. The celebration also required the temporary removal of bollards and ornamental lampposts.

8.53 Internally, the major adaptations included the opening up of the Choir, which was facilitated by the removal of the screen and dividing the organ. In 1861 a new pulpit was installed followed by the construction of a new reredos in the 1880's. Heating was also introduced into the building for the first time in the 1850's and Surveyor Penrose was also responsible for a reorganisation of the monuments. The choir vaults were decorated with mosaics designed by Sir William Blake Richmond. The Chapel of the Order of the British Empire in the crypt, instigated in 1917, was designed by John Seely, Lord Mottistone. Externally, Penrose rebuilt or altered all three entrances to the Cathedral; the steps to the west end and those to the North and South Porticos. At the west end the railings were removed (and sold by public auction) to be replaced by bollards. Penrose also designed the lamp standards, although these were subsequently replaced with the present ones designed by Edwin Lutyens in the early 20th Century.

8.54 During the 19th Century the setting of the Cathedral was altered by the purchase of a strip of land to the south by the Corporation of London in 1873. The former burial ground of St Faiths and St Gregory to the south and east of the Cathedral was then transformed into ornamental gardens. A fountain designed by Penrose and Horace Jones, Surveyor to the Corporation of London was erected in the north east churchyard in the 1880's. This was subsequently replaced by the column of St. Paul.

8.55 In the early 20th Century concerns regarding structural stability re-emerged. These included movement in the West Portico. Strengthening of the South transept had also been carried out. In 1901 the dome had been plumbed and found to be out of perpendicular, leaning towards the south-west. Subsequent measurement found the divergence had increased and that the piers to the dome had settled differentially. Grouting and strengthening works were carried out but by 1924 the situation was of such concern that a Dangerous Structure Notice was served which instigated a substantial programme of repair. This involved further grouting of the piers, removal of iron cramps and the insertion of two stainless steel girders around the dome with associated steels at its base. These were to prove their worth in the following decades when the Cathedral was under its greatest threat.



The High Altar of St Pauls showing bomb damage in 1940 The Reredos was replaced after the war by the current Baldacchino and High Altar designed by Godfrey Allen and Stephen Dykes Bower

8.56 The Second World War has a strong claim to be the m significant period in the later history of the Cathedral, at least in the national and popular imagination, when it became a symbol of resistance and, ultimately, victory against adversity. The destruction of the Cathedral by bombing was an important objective of the German Luftwaffe in the Blitz of London because destruction of the building would have significantly damaged national morale and consequently resistance to the planned invasion of the country. High explosive bombs fell very close to the south west corner of the western steps as well as to the south-east and north-east of the Choir. The building itself was struck twice, with bomb damage caused to both the north transept and the east end of Choir. Further damage through incendiary bombs was averted by the now legendary activities of the St Paul's Watch who were volunteers running across the roofs of the building removing or extinguishing the incendiary devices.



St Pauls Cathedral: taken 29 December 1940 by Herbert Mason © Associated Newspapers

8.57 One of the defining images of the Cathedral that has become iconic is that taken in December 1940 by Herbert Mason with the caption *"War's Greatest Picture; St Paul's Stands Unharmed in the Midst of the Burning City".* However, Mason's original picture was modified by the Daily Mail; it was cropped to focus more attention on the dome, and less on the ruins around it and there is evidence that brush strokes were added to the bombed-out windows of the foreground buildings to suggest flames. The Mail urged readers to 'cherish' this picture as a symbol of 'the steadiness of London's stand against the enemy: the firmness of Right against Wrong'. Mason's image was presented as nothing short of a symbol of civilisation itself. Such allusions were repeated when the photograph was reprinted in the Illustrated London News on January 4th, 1941 as, 'a symbol of the indestructible faith of the whole civilised world'. In the US (not yet at war with Germany), the photograph appeared in Life magazine that same month. But the image was also used on the front cover of German newspaper, Berliner Illustrierte Zeitung (Berlin Illustrated Times), 23 January 1941 with a caption "*The City of London burns*". It therefore illustrates the complex cultural values that can be attached to historic buildings and how they are seen.

8.58 The photograph was not simply "war's greatest picture", but also an important symbol in debates about post-war reconstruction which evoked the history of the Cathedral itself and it's resurrection after the Great Fire had decimated the city. Famous names associated with the picture include the author J B Priestley, who wrote a book called "Britain Under Fire", and American photographer Lee Miller, who took pictures for a book called "Grim Glory" and both publications featured versions of Mason's picture on the cover.[1]

8.59 In the immediate post-War period St Paul's was at the centre of both national commemorations and celebrations including Thanksgiving Services for both Victory in Europe (VE Day) and Victory in Japan (VJ Day). It would also be the location for the state Funeral in 1965 of Britain's war time Prime Minister, Sir Winston Churchill; the first state funeral for a politician in the 20th Century which was also the biggest national event since the Coronation in 1953. Churchill's cortege followed the traditional ceremonial or processional route from Westminster Hall to the west front of St Paul's and he departed the Cathedral by being taken to Tower Hill for transport by river to the Festival Pier on the South Bank. This State Funeral at St Paul's was to be followed 48 years later by a Ceremonial Funeral for Baroness Thatcher, Britain's first female Prime Minister and the longest serving of the 20th Century.

[1] Dr Tom Allbeson, Cultural Historian Swansea University

8.60 St Paul's was central to the discussions about the recovery of the country following the War and it was the location for the Launch of the Festival of Britain. Redevelopment around the Cathedral itself was hotly debated including at a national level. Several competing proposals and masterplans were developed and concepts for the creation of a new setting around the building differed; echoing the debates and conversations that flowed around the creation of the Cathedral itself following the great Fire, centuries earlier. A report by William Holford called *"The Precincts of St Paul's"* was presented to the Corporation of London in 1956 and the initial development of Paternoster Square in the 1960's was the subject of much criticism before its replacement with the much more successful development which is experienced today. The influence of St Paul's including the Heights Policy in the development of strategic views identification and management in the later decades of the 20th century and helping to define the initial consideration of the location of tall buildings at the turn of the Millennium can still be appreciated today.

8.61 Whilst the Cathedral was the centre of national celebrations in the 20th Century including the Silver Jubilee of Queen Elizabeth II in 1977; to be followed by her Golden Jubilee in 2002; Diamond Jubilee in 2012; and Platinum Jubilee in 2022, it has also been the location for demonstrations and protests. One of the most challenging for the Cathedral Authorities were the Occupy London demonstrations of 2011-12 which included encampments established immediately outside the west front of St Paul's. This resulted initially in the closure of the Cathedral to the public although the right to peaceful protest was supported. The protest was characterised as being an anti-capitalist Movement, although Occupy London defined itself as a Movement to create alternatives to what they described as an unjust and anti-democratic system and called for global democracy. The St Paul's site had been the last surviving high profile camp of the worldwide Occupy movement.



9.0
Evolution of the setting of St Paul's

9.1 *This chapter is provided to enable an understanding of how the history of change to the setting of the Cathedral has affected the contribution it makes to its significance and therefore help determine how further development is likely to affect it. By providing this assessment it is possible to understand how negative impacts from past developments have happened and how the setting may be enhanced by, for example the removal of inappropriate structures.*

9.2 The discussion in the chapter is based on the definition of setting provided in the NPPF:

Setting of a heritage asset: 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. NPPF Glossary, July 2021

9.3 The assessment is chronological and includes a short bullet summary of what happened, why it happened and the consequent impact which is framed by our understanding of the significance of the Cathedral (as set out in paragraphs 8.11-8.14 above).

SB4: Summary of setting changes from construction until c1800

- Reconstruction of the City of London largely to old street plan.
- Construction of The Monument and the City Churches.
- Demolition of the old Ludgate which blocked the view of the Cathedral as approached up Ludgate Hill.
- Development of London westwards along the Strand in Mayfair and Bloomsbury with the emergence of London squares; *(wider setting)*
- Spitalfields and silk weaving established to the north-east.
- Significant civic buildings including Somerset House, Mansion House, Bank of England; Royal Mint and Custom House to the south and west.
- The New Road created 1757 from Paddington to Islington (approximately the line of Euston Road) forming north boundary of London *(wider setting).*
- Expansion of Southwark south of the river further south for artisan houses and developments associated with industry including the leather trade *(wider setting).*
- By 1800 London extended from Hyde Park to Limehouse and from Southwark to Hoxton with further ribbon development along main routes towards Kensington, Islington, Mile End and Camberwell *(wider setting).*
- Increased use of the river for trade and traffic.

Impact on key elements of setting and how they contribute to significance

Skyspace:

- The dominance of the mass of the Cathedral on the skyline is unchallenged and complemented by the towers and spires of the City Churches.
- The extent of clear sky space enables The Monument and the Cathedral to be seen in counterpoint.
- The change results in the now iconic depictions of London by visitors and artists and is the high point in terms of the Cathedral performing its intended architectural and symbolic function.

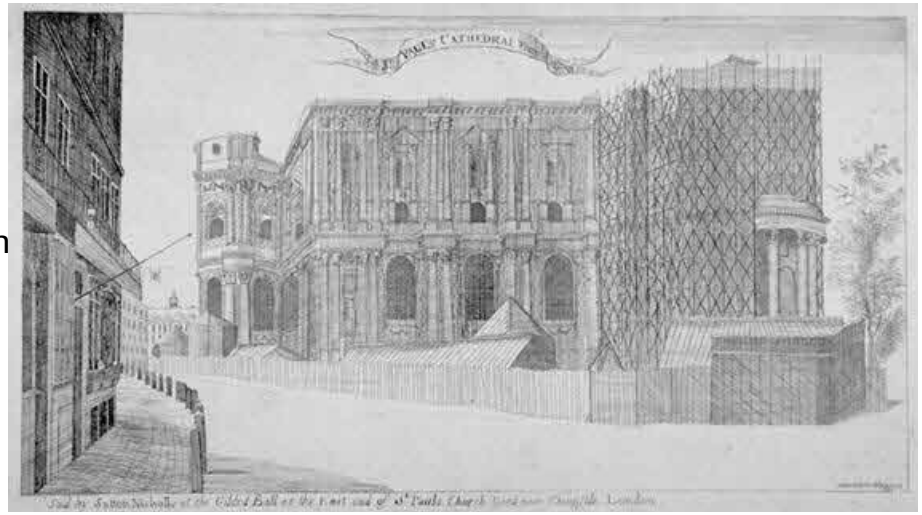
River corridor:

- The use of the river as a trade artery with new buildings including Custom House and warehouses encroach upon appreciation of lower sections of the cathedral.

St Paul's Churchyard or close setting:

- Removal of Old Ludgate enhances visual prominence of the Cathedral as terminus of the western approach and contributes to understanding architectural composition of the west front including the drama of the Baroque towers.

Setting at the time of construction



Wren's Cathedral during construction, view from the north-east by Sutton Nicholls 1695 © Society of Antiquaries

9.4 The great Fire of London had destroyed over 13,000 houses and laid waste to over 80% of the city within the walls. The burnt area extended from Temple and Fetter Lane in the west up to Aldersgate and Cripplegate in th North and extended east as far as Leadenhall Market and Tower Hill. The implementation of the new plan of the City prepared by Wren, amongst others, would have required combining and then redistributing all private property within the City which was regarded as impractical at a time when the nation was at war and there was an urgent need to shelter the homeless and to re-establish trade and commerce. Therefore, the city wall remained and its gates were repaired and rebuilt and, although there was some street widening, the City was to be rebuilt largely on its old plan.

9.5 At the beginning of construction some of the remains of old St Paul's were still standing, but the buildings in the immediate setting of the old precinct had been destroyed. The reconstruction of the buildings around St Paul's Churchyard had commenced by 1670 and most were in place before the new cathedral was completed in the early 18th Century. The Act of Parliament for rebuilding the City had required that all the high streets (including that which lead round the south-side of St Paul's) should be 40 Feet broad so at time of construction the relationship between the old and new cathedrals with

their respective settings was different. In the 18th and first half of the 19th Centuries St Paul's was surrounded on all four sides by largely late Stuart and early Georgian buildings, mainly of brick or render and generally three to five storeys high; with the exception of St Paul's School located to the east. The ground floors of these buildings facing onto the churchyard were frequently in commercial use. To the east, Cheapside was a major shopping centre, as it had been in medieval times and Ludgate Hill to the west also became a fashionable shopping area. Surrounded by the railings with access into the churchyard controlled, mainly from the west end and the transepts, the Cathedral would have been experienced as clearly separate but a building that totally dominated and defined its immediate setting. Engravings published by Act of Parliament such as that by Muller in 1753 emphasised this dominance by having their viewpoints elevated and exaggerating the width of the street (St Paul's Churchyard) on the northern and southern sides to create more space around the building. But the engraving provides a good impression of the silhouette of the dome and towers and the statues on the pediments which enliven the skyline.



St Pauls from the North-West in 1753 T M Muller

Evolution of setting through the 18th Century

9.6 In London, during the 18th Century, topographical depictions of views from high locations such as Richmond Hill, Greenwich Park, Hampstead and Highgate and hills to the south proliferated. Early tourists were attracted to these locations for the view afforded by the city's bowl-shaped topography. From a relatively high position at the bowl's edge, they could marvel at the status and scale of the city and its landmarks spread out before them, imbuing the viewer with an appreciation of the power of the Monarchy, the Church and the mercantile navy; all of which illustrated the growing trading and industrial power of London, England's capital. The numerous middle and long-distance views of St Paul's during the 18th century characteristically show the building in relation to the river which best illustrated its total dominance in terms of scale and height. Many views were taken from the south bank and from above the actual ground level in order to capture the distinctive and admired skyline of the city comprising the dome of the Cathedral with the counterpoint of the towers and steeples of the City Churches. An exception is Canaletto's view of the Cathedral from Richmond House further west in Westminster, which takes advantage of the bend in the river and places the Cathedral in its widest panorama and showing the spires of London's churches extending across the whole skyline. Whilst there are elements of



St Paul's from Richmond House by Giovanni Canaletto 1747
Goodwood House Collection

romance and artistic licence in the image, including what look suspiciously like gondolas and elegant barges on the Thames, the depiction of the skyline is probably reliable in terms of impression and is consistent with his other views, notably *London and the Thames from the Terrace of Somerset House.*



St Pauls as shown in an “accurate” view from the Camera Obscura in the Royal Observatory Greenwich 1804 note the undeveloped fields in the foreground, the line of the hills to the north and the view centred on the dome of St Pauls. The church of St Pauls Deptford is in the foreground and Westminster Abbey is on the extreme left in the background

9.7 There was a desire to improve the setting of the new cathedral, particularly in relation to the river throughout the 18th Century. At the end of the century the redevelopment of the riverside between London Bridge and Blackfriars Bridge came under review. The congestion of boats on the river wanting to unload and store valuable merchandise as trade expanded meant that London, Britain’s main port, was inundated with vessels. A parliamentary committee was set up and the City favoured the rebuilding of the quays south of Lower Thames Street. By 1800 the Clerk of City Works, George Dance the Younger, conceived a ground plan for the improvement of the City and the Surrey (south) bank. Dance’s plan proposed two new bridges to replace the decaying Old London Bridge. From these bridges, wide thoroughfares radiated on both sides of the river and extended west to St Paul’s. Dance proposed street improvements around St Paul’s, with the Cathedral as the centrepiece. Thames Street was to be widened and straightened, and a new street created running from the south side of the Cathedral down to the river, terminating in a semi-circular open space. This was a deliberate

attempt to provide an appropriately dignified view of St Paul's from the south bank. The House of Commons approved the scheme but the cost was prohibitive and it went no further.

9.8 Therefore, by the end of the 18th Century the wider setting of St Paul's would have remained largely as depicted by the earlier engravings and paintings, although the extent of development would have increased as London continued its expansion into the surrounding countryside.

9.9 The closer setting of St Pauls can be interpreted on Richard Horwood's Plan of the Cities of London and Westminster 1792-99. This shows that to the south, between the river and the Cathedral, there remained a dense network of alleys and narrower streets comprising Great and Little Carter Lanes, Great and Little Knightrider Streets and Upper Thames Street running broadly east-west. These were crossed by Benet's, Peter's and Lambeth Hills all leading up from the wharves and warehouses that lined the river bank. These buildings would have screened the south elevation from street level and only glimpsed views of sections of the elevations of St Paul's would have been possible framed by these buildings. The views would have expanded as the upper level of the hills were reached when, upon arriving at the churchyard, the full extent of the scale and form of the cathedral would be experienced.

9.10 In the City, to the east of St Paul's, the slightly more regular block plan between Cheapside to the north and Watling Street to the south would have framed the main approaches to the Cathedral. To the north of St Paul's, the smaller streets and lanes around Newgate Market were separated from the Cathedral by Paternoster Row which, with the development along St Pauls Churchyard, would have effectively screened much of the elevations of the Cathedral at street level. To the west, Ludgate Hill and Street containing the church of St Martin provided the main approach and the best street views of the cathedral within its immediate context. The Cathedral formed the terminus of the views up the hill. These views then opened up to the forecourt and the statue of Queen Anne by Francis Bird. The Cathedral would have been visible over large swathes of what is now central London, including from areas such as Islington, Hampstead and Highgate and as far west as Westminster; with much greater visibility in a landscape context, depending upon atmospheric conditions, from the hills to north and south of the capital a considerable distance away.

9.11 From the river, which was a major east-west route, and particularly when travelling west, the apse, dome and towers would have been clearly visible from some distance downstream and the upper section of the walls would also have been apparent. The scale and form of the Cathedral would thus have been readily understood.

The Setting of St Paul's: 1800-1900

SB5: Summary of key changes to setting 1800-1900

- Remodelling of Whitehall and new Houses of Parliament consolidating Westminster as seat of National Government (wider setting).
- Large scale rebuilding in the City of London, widening streets, with Bank junction emerging as particularly important and extension of Cannon Street westwards approaching the Cathedral.
- Reconstruction of the Royal Exchange.
- Expansion of commercial buildings around St Mary Woolnoth and specialist Victorian exchange buildings including the Stock Exchange and the Baltic Exchange some deriving inspiration from architectural style of St Paul's.
- Act of Parliament for the construction of docks outside the Jurisdiction of the City to the east (wider setting).
- Associated rebuilding of riverside shipbuilding, warehouses and commodity exchanges along with factories to refine and process imported goods and materials; textile warehouses constructed along south side of St Paul's Churchyard.
- Construction of railway termini into the capital including in the City with associated new river crossings enabling commuting for workers and allowing a greater proportion of London's working-class housing to be constructed north-east of the capital.
- Embankment of the Thames with associated transport and sewer infrastructure.
- Consolidation of financial and commercial activities in the City reducing the resident population by over two thirds.
- Emergence of "late Wren" and the English Baroque as a new "national" style represented by increasing numbers of Portland stone banking, insurance, civic and commercial building in the city.



St Pauls from the south-west by Thomas Hosmer Shepherd Early C19

Impact upon key elements of setting and how they contribute to significance

Skyspace:

- Continuing rapid change to the wider setting from expansion of London but no major challenge to the visual dominance of the Cathedral on the skyline apart from-
- Rebuilding of the Houses of Parliament introducing significant skyline features (Victoria and Elizabeth towers) appreciable with dome and towers of Cathedral across sections of the capital, however the two buildings illustrate the twin cities that form the historic morphology of Londo
- Increased height of commercial and public buildings begins to impact upon the clarity of the relationship between the Cathedral and the city churches on the skyline.
- New skyline features often in revival styles including The Old Bailey inspired by the Cathedral emphasising its architectural importance despite a reduction in the extent of clear sky.

River corridor:

- New railway infrastructure crossing the river introduces visual intrusion and activity that erodes the open corridor and clarity of its contribution to the significance of the Cathedral but it also provides new views and ways of experiencing its design and form.



St Pauls Cathedral from the south-east c1900. Note the trees marking the site of the St Paul's Deanery gardens

- Embankment of the Thames and large-scale development, including along the south side of the churchyard, erodes the visual and symbolic prominence of the Cathedral and the ability to appreciate its architecture and form from the river.
- Increasing scale of development and industrial nature of the activity along the south bank in Southwark and Lambeth introduces visual competition and erodes the ability to connect with artistic representations of the Cathedral from the west and in the approaches from the east.

St Paul's churchyard / close setting:

- Improved visibility of the Cathedral from the east by the extension to Cannon Street enhancing prominence architecturally and symbolically.
- Physical separation of the Churchyard being eroded by increasing commercial activity/buildings affecting the experience of the architectural significance and symbolic role of the Cathedral.
- Reconfiguration of the churchyard by Penrose including rebuilding steps to Wren's design enhancing architectural significance particularly when approaching from the west.
- Removal of railings and reduction in space at west end affected the ability to experience the architecture and the experience of arrival at the end of the processional route.
- Alterations to setting, including increased traffic, is evident in early photographic images of the Cathedral providing an identity that is used subsequently in films
- New spaces and steps depicted in film especially Mary Poppins, cementing the cultural value of the Cathedral in popular culture.
- Ability to appreciate the architecture and details of decoration eroded by the impact of pollution and surface encrustations from industrial activities
- New development in city to the west and north enhances the historic interest of the Cathedral by illustrating its influence on urban design and planning of new commercial and civic buildings in London including the Institute of Accountants and The Old Bailey.

9.12 There were further attempts to beautify the City's riverside in the early nineteenth century but they were not realised. Colonel Frederick Trench MP prepared drawings to depict his proposal for the Thames Quay - new quay which stretched from Westminster to London Bridge. This was subsequently curtailed to terminate at St Paul's where he proposed an avenue flanked by gran houses to form a monumental approach to the Cathedra The architect Thomas Allom similarly proposed a line of classical terraced houses en-route to the Cathedral. Non of these great schemes came to anything; the ageing wharfs and warehouses remained along the river front and were gradually rebuilt piecemeal throughout the 19th century increasing in their height and scale.

9.13 At the middle of the 19th Century the cathedral dome was used by soldiers from which to take bearings in connection with the triangulation of the area for the first Ordnance Survey Maps of London and subsequent Ordnance Survey mapping provides a basis for identification of change to the setting of St Paul's. In the early 19th Century several commentators compared the immediate setting of the Cathedral unfavourably with the squares and terraces being built to the west in what is now central London. However, the road layout remained largely resistant to significant change until the 20th Century. Along the north bank of the Thames below the Cathedral the redevelopment of warehouses had begun to raise the height and scale of building, but it was still



View of St Pauls from the North-West c 1870

possible to appreciate the upper sections of the walls, t towers and dome from the south east and the river, alo with the towers and steeples of the City Churches.

9.14 A panorama of London produced in the illustrated London News in 1845 demonstrates that the Cathedral was still the dominant building in the city and would have remained largely visible from the edges of the ther built-up areas of the capital. The ability to appreciate the Cathedral from the south bank of the Thames was now beginning to be eroded because of the developmen of the former open fields and gardens in what are now parts of Southwark and Lambeth and the construction of industrial and commercial buildings of larger scale connected with brewing and leather working, amongst other trades. Development in the suburbs included the addition of new church spires which continued an established characteristic of the London skyline and would have represented positive change in the context of the Cathedral where they were intervisible with it in the long-distance views from the north and south; but the increasing scale of development was the beginning of a process that was to start to reduce the ability to experience the Cathedral in the way originally intended by Wren.



Cannon Street Station from the new river bridge on a postcard c1901

9.15 As part of the Cannon Street extension in 1847-54 Ludgate Hill was widened along the south side at the junction with St Paul's churchyard to provide an opening sufficient to take in the façade. About this time large textile warehouses rose around the churchyard, their height almost matching the walls of the Cathedral itself. The introduction of new railway infrastructure included Hungerford Bridge, originally a footbridge 1845 but with a railway bridge in 1864; Tower Bridge 1894; London Bridge 1831, Blackfriars Railway Bridge 1864, and Blackfriars Road bridge 1869 which was remodelled in 1886. In 1864, the London Chatham and Dover Railway Company continued their route into the City with a new line over Ludgate Hill. Ludgate Hill station was carried on a viaduct on New Bridge Street and a bridge over Ludgate Hill in 1866 which obstructed views of the Cathedral on the western approaches. A notable change in the setting of the cathedral in relation to the river was the construction of Cannon Street Station in 1863-1866. The site was first proposed as a terminus by the South Eastern Railway in 1860 and in addition to providing a station for commuters from the south it was also to be a direct railway link between the city and the west end. This would greatly improve the time it took to travel between the two on the congested road network then in existence.

9.16 The station required a new crossing of the river and was also a major new structure and very visible from the Thames. This "public" elevation therefore framed the station arch between two brick towers which clearly drew their inspiration from the Wren design for the towers of the City Churches as they are simple, square in plan and contain the characteristic segmental open arches under keystones found in the bell stages of many of the city church towers and they terminate under leaded ogee roofs. They survive today.

9.17 By the end of the 19th Century and into the early years of the 20th, London was at the zenith of its importance as the capital of a global empire. The population of London and its inner suburbs, which was the area governed by the London County Council created in 1889, reached its peak according to the census in 1901 at c 4.5 million. The population for Greater London was c 6.5 million. There was a building boom in London from around 1897 to 1906 and it continued to be busy during the First World War. By 1900, the LCC was engaged in major urban improvements including housing estates and the creation of major new thoroughfares. The Victoria Embankment had been completed in stages from 1864-1870 and The Strand was widened from 1899 onwards. Queen Victoria Street was cut through between 1867-71 to link Victoria embankment and Blackfriars Bridge with the heart of the City, but the project which caught the imagination of the public was the creation of a new main street from the Strand to Holborn with an extension onto Russell Square. The new avenue, Kingsway, was opened in 1905 by King Edward VII.

9.18 In the City of London a transformation had also occurred which had changed both the character, in terms of the uses within the area, but also its appearance. At the opening of the 20th century the City was the financial capital of the British Empire and it was prospering as never before.

9.19 As part of the radical change in London architects of large buildings in particular began to look for a new "national" style fit for an imperial capital. As early as 1889 John Brydon in a lecture to the London Architectural Association on the "English Renaissance" identified the style of what was described as "late Wren" and Vanbrugh as the national style by 1720. It therefore offered a model for what they were seeking as it was regarded, ironically, as truly English, rather than an import from abroad. In addition, the style did not inhibit originality as it did not follow the rules of proportion and the strict logic of Renaissance classicism. It was also suited to architectural sculpture for those buildings where display was an important element of their function, including commercial, banking, Insurance and new civic buildings. The first notable building in this "new" style was The Institute of Chartered Accountants in the City of London (1890-1893) by John Belcher and Beresford Pite and situated in Moorgate Place. By the time of the Diamond Jubilee the style was very fashionable and countless town halls, government buildings and imposing office blocks were designed and built in this English Renaissance manner. The architectural style of Wren was now undergoing its own "resurgam" which transformed the appearance of the City of London and remains appreciable today.

9.20 St Paul's Churchyard had undergone some change in the later 19th Century, mainly to the south-west corner and at the junction of the Churchyard with Ludgate Hill which included several new commercial buildings constructed in the 1870-90's. The introduction of taller, overtly commercial buildings, including Dakins and Goodman's, which emphasised the end of Ludgate Hill, in combination with rebuilding along the north, introduced more activity and a change in the relationship with the Cathedral. The south west corner of the Churchyard was again remodelled in 1900 when the present alignment was created. The former railings that had separated St Pauls and defined the "piazza" at the west were removed and bollards were introduced which eroded the formality of the space. The space itself was reduced in area and the junction was enlarged to the east so that it was closer to the statue of Queen Anne. Traffic, mainly horse drawn at this time, was also considerable. The sense of separation between the Cathedral and its immediate setting which had been the characteristic experience from the time of its construction was now being eroded.

9.21 The changes and expansion of the capital in the 19th Century resulted primarily in an increase in height of buildings in the immediate setting of the Cathedral and along the river bank. Conversely, the creation of the Embankment and provision of a number of new crossings over the Thames provided new opportunities to appreciate the Cathedral, although this was principally the upper levels of the structure. Industrial and commercial chimneys were proliferating and the general environmental conditions around the Cathedral had deteriorated, which negatively affected the ability to appreciate its architecture.

The setting of St. Paul's: 1900-1950

SB6: Summary of key changes to setting 1900-1950

- Increasing scale of commercial development for city as financial centre in revivalist styles including the English Baroque referencing the work of Wren and regarded at the new "national" style.
- New buildings in Queen Victoria Street and south of the Cathedral of increased height.
- Construction of Bankside Power Station.
- Unilever Building and Faraday Building introducing new office buildings of unprecedented scale and height.
- Establishment of the St Paul's Heights agreement based o the work of Godfrey Allen.
- Extensive bomb damage to the north, east and south of the Cathedral.
- Bomb damage to the Cathedral North Transept and Choir.



St Paul's and the City of London from the south-east 1928 Note Canon Bridge Station which would have obscured views of the lower section of the Cathedral when approaching from the river. Note the number of City Church towers (approximately 10 in this view) that still rose above the general building heights and enlivened the skyline. These were appreciated in conjunction with the cathedral particularly from the southern area of its setting. (picture credit: Historic England)

SB6 cont.

Impact on key elements of setting and how they contribute to significance

Skyspace:

- Loss of skyspace as a result of Unilever Building and Faraday Building to south west harms the architectural and symbolic prominence of the Cathedral.
- Introduction of St Paul's Heights agreement is the first acknowledgement that the visual prominence and architectural dominance of the Cathedral required management and protection.

River Corridor:

- Harm to architectural and historic interest by the erosion of visual prominence and dominance through new development particularly to south (*wider setting and approaches to Cathedral*).
- Queen Victoria Street and associated buildings severing the connection between Cathedral and river and undermining their topographical relationship.
- Bankside Power station competing visually with the Cathedral for prominence in views along the corridor.

Churchyard/close setting:

- Loss of historic street pattern and enclosing buildings to north east and south of the Cathedral erodes the contribution made by setting to the historic interest of the cathedral.
- Enhancement of historic and architectural interest demonstrated by the influence the Cathedral in informing new commercial development in the financial area of its setting.
- Erosion of space to west end and the scale of development harms the relationship between the processional route and the sense of arrival at the Cathedral key elements of its historic, architectural and symbolic function.

9.22 The change to the wider setting of the Cathedral in the latter years of the 19th century had, in general, not raised significant objection because it was still governed by the London Building Act which restricted heights of buildings to 100 feet based in part upon fire safety requirements. In St Mary Axe, Jeffries Square was redeveloped for the Baltic Mercantile and Shipping Exchange, first established in 1744, and provided with a new headquarters buildings in 1902-3 designed by Smith and Wimble. Although the majority of commercial firms in the City were small, the number of very large firms, requiring larger premises, grew rapidly after the First World War. Although that war slowed the process of rebuilding it did not interrupt it totally and the 1920's were, in many ways, the apogee of commercial architecture for banks and headquarters buildings, particularly those for Insurance companies, often designed by leading architects of the period. The former residential character of the city diminished significantly as part of its emergence as a financial centre and the scale and architectural grandeur of buildings increased.

9.23 In the first decades of the century significant numbers of large commercial buildings many in Baroque or other revivalist styles were constructed to the north of the Cathedral. The most notable was the Old Bailey 1902 by EW Mountford as its dome, crowned by the gilded figure of Justice broke the skyline. However, by the 1930's the height of new office buildings around the approaches to the Cathedral and particularly to the south was becoming a concern. W. Godfrey Allen, appointed Surveyor to St Paul's Cathedral in 1931, produced a report in 1932 in which he drew attention to the fact that "quite recently the view from Blackfriars' Bridge has been spoilt by the hideous new Telephone Exchange building in Queen Victoria Street". He continued: "The question of the height of buildings near St Paul's is a difficult one and I intend to investigate it thoroughly".

9.24 He prepared a series of montages showing the effect that building to the limits allowed by the London Building Act of 1930 would have on views of the Cathedral. The views wereoverlaid with representations of buildings built up to the 100ft limit. These were intended to indicate the impact on the Cathedral from afar and close up, particularly from the south, and from the river and its bridges. In his notes that accompanied his survey Godfrey Allen wrote:

"At present a building may be erected to a height of 100ft to the cornice. In new Bridge Street and along Thames side, buildings carried up to the regulation height would gravely interfere with the distant views of the cathedral from the Surrey side of the river between Waterloo Bridge and Blackfriars Bridge, and practically blot out nearer views. These views are amongst the finest in London."



A photograph of the Faraday Building taken from the river in the 1950s, which illustrates the impact the building had on views and the setting o
St Paul's (picture credit: © London Metropolitan Archives, City of London).

He continued:

"It would therefore seem of urgent importance to invite the attention of the authorities concerned to the growing menace to the civic development of the City. The City authorities could do much to help and it is greatly to be hoped that they will use their special powers conferred on them by the Town and Country Planning Act of 1932 to town-plan the locality near St Paul's to endeavour to ensure that the best views of the cathedral and other buildings of beauty and historic interest in the City are preserved"

9.25 This judgement found support. In 1934 the newly formed Royal Fine Arts Commission (RFAC) commented on the effects on the skyline of the Unilever House, which at 130 feet (39.6m) obstructed views of the lower part of the dome and towers of St Paul's from the centres of Waterloo Bridge and Hungerford Bridge. Faraday Building near Blackfriars Bridge was also perceived to be uncomfortably close to the west front of St Paul's Cathedral. The Commissioners commented that both Unilever House and Faraday Building 'disastrously blocked some of the most famous and beautiful prospects in London'. Faced with encroachment upon the distinctive silhouette of St Paul's on the London skyline, the RFAC called for more controls. The result was the drawing up of the St Paul's Heights, a form of a 'gentlemen's agreement' to protect important vistas of



St Paul's Close setting from the south-west: aerial view just before 1940: note the weather-washed cleaner upper storeys and darker elevations under the middle cornice. The tight enclosure of the churchyard with largely C19 commercial (retail) development and the larger commercial (finance) and civic buildings of the city beyond to the north and west. Note the three City Church towers in close proximity to the Cathedral and experienced in conjunction with it (picture credit: Historic England archive).

the Cathedral. St Paul's Heights prescribed the maximum height for any part of any new building which lay within seven viewing cones centring on the building. It was intended to protect views of the Cathedral above the balustrade, and, crucially, of the dome. In 1938 this was adopted by the Dean and Chapter and the City of London as a basis for consultation for development within an area around the cathedral. The Heights were also extended in 1981 to protect certain northern views of the Cathedral identified in liaison with the London Borough of Islington. The agreement was not enshrined as formal policy until 1989, but has in general been highly effective in deterring tall buildings very close to St. Paul's.

9.26 In 1940-1941 large areas of the City north of the Cathedral were destroyed by aerial bombardment with much of the area around the churchyard also bombed and buildings gutted by fire. Along the north side of the churchyard the majority of buildings were either destroyed or gutted and the areas beyond around Paternoster Square were completed flattened. To the east of the Cathedral Old Change and the city blocks between Cheapside and Cannon Street were similarly largely destroyed. South of Cannon Street, extending across Queen Victoria Street and down to Upper Thames Street similar destruction occurred, and a similar fate befell the wharves and warehouses around Puddle Dock to the south-west. Along the south side of the churchyard in the closer setting of the Cathedral, damage was slightly less extensive although the shops and warehouses opposite the south transept were flattened or gutted by fire. To the west, the upper section of Ludgate hill, around Ave Maria Lane was flattened and extensive damage also occurred at Ludgate Circus at the bottom of the hill.

9.27 It was at the height of the war that the Government decided to rebuild Bankside Power Station (A), first constructed in 1891. This had provided power for the City, although it also introduced significant smoke and grit pollution. The subsequent decision to rebuild the power station in the 1940's was highly controversial. The new building designed by Sir Giles Gilbert Scott was completed in 1963. It was oil powered and caused considerably less pollution although it did discharge treated water into the Thames, hampering improvement effort to clean up the river in the 1960's.

The setting of St Paul's: 1950-2000

SB7: Summary of key changes to setting 1950-2000

Churchyard/close setting:

- The views of the Cathedral from the west re-established, enhancing architectural prominence and ability to appreciate form and scale.
- Post War Reconstruction of south and west weakens the line of original boundaries of the Churchyard and therefore an appreciation how the Cathedral was historically contained.
- Environmental impacts from traffic along the south side of the churchyard detrimental to an ability to appreciate the architecture of the Cathedral, although mitigated by improved public realm.

Intermediate setting:

- Construction of new, tall buildings including The Barbican (1960's) and the National Westminster Tower (1970's) in the city emerge as vertical elements in the sky space beginning to change the skyline. The impact is very appreciable from the south of the Cathedral along the river corridor and in views east from Waterloo. The tall buildings affect the visual prominence of the west towers in particular.



St Paul's Cathedral close setting from the South-east in 1944: Note the destruction of Old Change and the formerly defining eastern edge of the Churchyard, the damage to buildings at the junction with Cheapside (to the right) and the survival of Cook's Drapery warehouse to the left which was later demolished

SB7 cont.

- Reconstruction of the city blocks to the south, between the Cathedral and the river. These conformed to the St Paul's Heights to produce a distinctive element in the townscape, with consistent rooflines deferring to the Cathedral which remained visible from entablature level and above against the sky.

Wider setting:

- New taller buildings also emerge on the south bank including Bankside Power Station and, in particular, Guys Hospital Tower (1974), Further tall buildings emerging to the north west, including the Euston Tower (1969). In the wider setting and from elevated viewpoints these buildings obscure parts of the Cathedral and/or appear visually attached to the west towers. In a kinetic experience of the Cathedral from the north the new taller buildings intrude into the silhouette of the Cathedral.
- Development of Canary Wharf in the 1980's and 1990's included Britain's then tallest building One Canada Square in 1991 amongst other tall buildings (33 and 25 Canada Square). Visually dominating the river corridor in views from the east including those from Greenwich and distracting from the visual presence of the dome of St Paul's which then became appreciated as part of the background skyline.

9.28 The immediate problem in 1944 when the war was reaching a conclusion was the reconstruction of the City of London. The City Engineer F.J. Forty published a Reconstruction Report in 1944. More open space was to be provided south, east and west of the Cathedral, with new buildings of uniform height. Longer views were to be secured by widening Ludgate Hill and by making new vistas in line with the dome and transepts, with a number of road-widening options. The report was criticized by the RFAC. They advocated replacing height restrictions in favour of plot-ratio control (expressed by site area divided by floor area), allowing buildings to rise higher in return for leaving land clear for road widening, traffic-free precincts and public gardens.

9.29 Plot-ratio planning, a way of calculating the bulk of a building relative to the size of the plot, was duly adopted in the City's second reconstruction plan drawn up by Dr Charles Holden and Professor William Holford in 1946-7. This was adopted in essence in the County of London Development Plan of 1953. The Cathedral was to remain the City's chief building and the spirit of the agreement St Paul's Heights agreement was honoured in providing for a formal setting for St Paul's Cathedral, with no buildings allowed to be taller than Wren's masterpiece. A consistent height limit for new churchyard buildings was set at 110 feet with another eleven feet in a set-back storey.

9.30 The desolation caused by bomb damage around Gresham Street enabled the construction of the Barbican Estate by Chamberlin, Powell & Bon. A concrete mega structure incorporating residential towers with educational and cultural facilities including the Guildhall School of Music and the Barbican Theatre. The three residential towers are prominent in long views and along considerable stretches of the South Bank with their distinctive silhouettes a striking contrast to the repose of the dome of the Cathedral. At the time of their construction, they were the highest residential buildings in Europe.

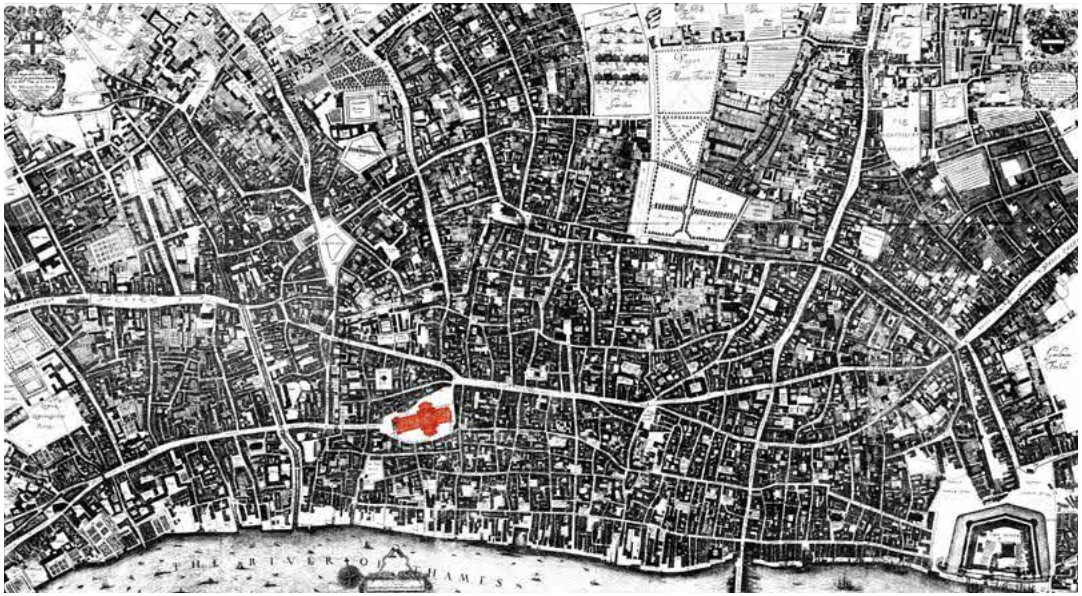
9.31 Reconstruction around the Cathedral itself was subject of a specific report by William Holford called "The Precincts of St Paul's" presented to the corporation in 1956. Two elements of the proposals were implemented, the first being the construction of the Paternoster development to the north of the Cathedral in 1961 (now replaced) and the movement of Ave Maria Lane at its south end to join Ludgate Hill a little to the east of its original medieval junction. To the east of the Cathedral the creation of New Change as the churchyard boundary on a new alignment opened up space. New buildings were proposed for the south-east of the cathedral precinct and for the realignment of Creed Lane along with a garden adjacent to the cathedral. A garden had in fact been laid out to the south east of the Cathedral in 1951 by Sir Albert Richardson as part of the City's contribution to the Festival of Britain but in a slightly anachronistic, in terms

of the festival, classical style. A new choir school was constructed to the east of the cathedral, designed 1962-7 by Leo de Syllas of the Architects' Co-Partnership. The distinctive modern building incorporated the restored tower and spire of St Augustine Watling Street which formerly stood on Old Change and had the effect of screening the churchyard gardens from New Change.

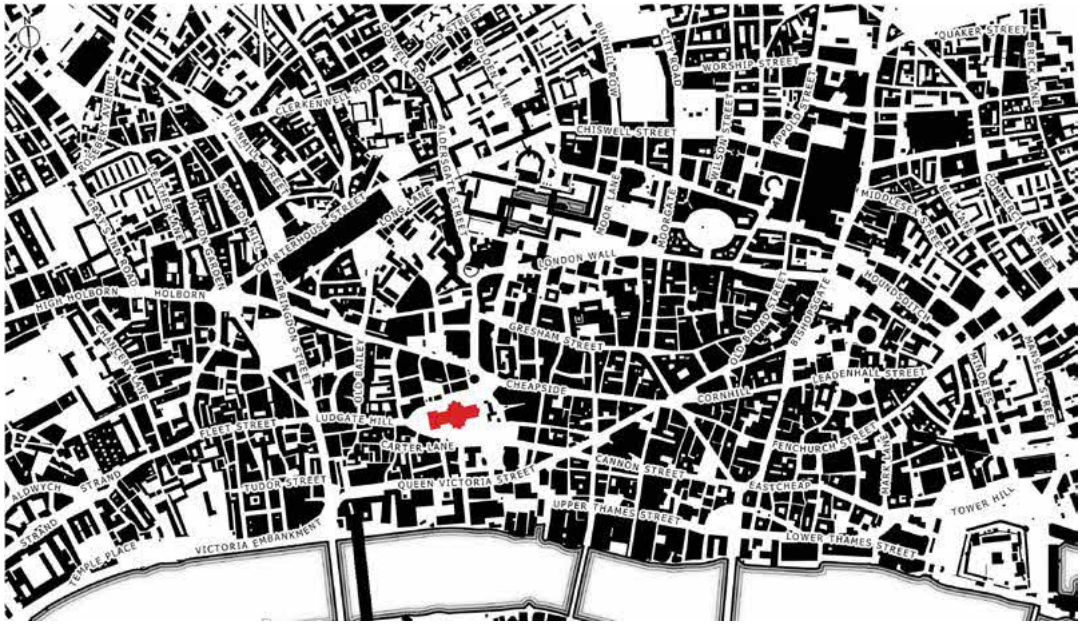
9.32 A further area of large-scale planning immediately north of the Cathedral was Paternoster Square. It was conceived as a large pedestrian piazza raised over a car park with steps up from St Paul's Churchyard. The buildings were completed 1962-7 in a mix of slabs with one slim tower and the impact upon the Cathedral was unfortunate. It was demolished and rebuilt at the old ground level in 1997-2003. The Colonnade was designed by William Whitfield with other buildings designed by architects including McCormac and Eric Parry. The masterplan included important elements such a reinstating Queens Head alley and a designed alignment with the north transept of the Cathedral. (see section below).



Paternoster Square looking to the drum, dome and N transept pediment of the Cathedral (picture credit: Historic England).



Street pattern and block sizes in 1676 (Survey of the City of London by John Ogilby and William Morgan)



Street pattern and block sizes in 2024

9.33 The eastern section of St Paul's churchyard still ran along its historic line immediately following the war, but it was re-positioned further east in 1961 establishing the present east boundary of the churchyard. The railings were then extended, first to the tower of St Augustine's church and then subsequently extended on a new alignment even further to the east and following the line of New Change, which is the form of the current boundary. The south-east corner of the current Cathedral churchyard therefore lies over the former 19th Century buildings that originally stood between St Pauls churchyard and Old Change, originally outside the Wren-period precinct. Effectively, between 1900 and 1961 the churchyard has shifted eastwards in relation to Cathedral markedly increasing the public open space to the East.

9.34 In 1956 the London County Council published guidelines in May 1956, entitled 'High Buildings in London', in which there was clear encouragement to build tall buildings that were 'carefully sited and well designed' and could 'contribute to the picturesque interest of the London skyline. The 100 ft height restriction was removed the same year with the support of the RFAC. Much taller buildings could now be erected and transformation of the London skyline began in earnest. Between 1937 and 1978 eleven buildings were allowed to infringe The St Paul's Heights agreement in the range of 2-10ft (0.6m - 3.05m) including Sudbury House and Paternoster Square, very close to the Cathedral and which at 205ft (62.5m) had a severe impact of the view of the dome from the north, including from Parliament Hill, which had previously been one of the finest views outside the City.

9.35 In an article in Country Life published in 1977 Patrick McCormack MP questioned the robustness of policy regarding tall buildings then emerging in London stating:

"As long ago as 1938 the City of London laid down regulations to protect certain views of the Dome from the Thames and in 1965 views from Parliament Hill were similarly protected. Now the cathedral is hemmed in on almost every side". Cormack pointed out that although, technically, recent tall buildings (which he defined as over 150ft or 45.7m, around 18 storeys) fulfilled the requirements of the protective regulations, such buildings continued to block views of St Paul's from other viewpoints –a consistent weakness and the limitation arising from the approach of using a protected view.

9.36 Whilst the debate at this time was being conducted with regards to the skyline and the concepts of *views*, the impact was actually upon the *setting* of the cathedral. In light of Wren's intended visual dominance of St Paul's, which was to be appreciated across the whole of the capital as an ornament for the nation and conveying the unity of Church and State, the subservient scale of buildings within the setting of the Cathedral was an essential requirement in ensuring that it continued to

support and contribute to the symbolic and architectural functions of St Paul's. These new, taller and substantial buildings represented a significant erosion of that dominance and consequently 'harm' (in terms of the NPPF) the significance of the Cathedral. The buildings include Guy's Hospital tower (1974) in Southwark and Euston Tower (1969) to the north west, among several others.

9.37 In the 1970's the construction of the National Westminster Tower in the City represented a significant development in the closer setting of the Cathedral and the concept of a Cluster of tall buildings around the tower was emerging. When completed in 1980 the tower designed by Richard Seifert was the tallest building in the UK and a direct challenge to the historic role that the Cathedral had performed for over two centuries in the context of London. The Nat West Tower was overtaken as the tallest building in the country by One Canada Square in 1990, which was constructed as part of the rejuvenation of London Docklands. The emergence of tall commercial sky scrapers in this location was visually prominent in views west along the river corridor, especially from the bridges over the Thames and also had an impact upon views from elevated ground to the south-east, in Greenwich. With each increase in height, these developments continued the process of reducing the prominence of the Cathedral in its London wide role.

9.38 By the close of the 20th Century the setting of St Paul's had undergone radical change. In particular, the ability to appreciate the cathedral in the London-wide context had become significantly eroded and the impressive scale and geometrical beauty of the design of the dome were being challenged and harmed. The former clearly experienced separation of the cathedral within its churchyard had also been radically altered with the creation of gardens along the south side and relocation of barriers around the more generous space to the east. The increased areas of gardens to the south and east were created in the immediate Post War period to provide a breathing space for the Cathedral and a more open setting; but one which has proved vulnerable to the environmental impacts of increasing traffic.

9.39 Perhaps one of the transformational planning achievements of this period was the substantial rebuilding of almost the entire building stock between the Cathedral and the river Thames (besides Faraday Building). Almost all of these new buildings were constructed with strict observance to the St Paul's Heights, creating a roof landscape and built environment that realised Mervyn McCarty's vision in a manner that could not have been anticipated 50 years before. A major gain to the setting of St Paul's was delivered enabling the connections with the river corridor to be safeguarded.

The setting of St Paul's: 2000 to the present

SB8: Summary of key changes to setting 2000 to the present

- Emergence of the City Cluster and very tall buildings in th form of the Heron Tower, 22 Bishopsgate and others.
- Emergence of secondary groups of tall buildings to the ea in Broadgate and Finsbury.
- Shard completed 2012 replacing Southwark Towers.
- Reconstruction of Paternoster Square including the re-location of Temple Bar and providing axial framed views from the north.
- New accessible entrance to the north portico of the Cathedral.
- Construction of Millennium Bridge House in foreground setting of the river corridor to the south
- Construction of the Millennium Bridge opens up a formal approach to the south transept.
- New Change constructed to the east with significant new framed views of the Cathedral.



St Paul's in its setting viewed from Waterloo Bridge 2023 Note the ability to see the dome and towers against clear sky but the visually prominent form of the city cluster (picture credit: copyright Historic England)

SB8 cont.

Impact upon key elements of setting and their contribution to significance

Skyspace:

- Secondary group of tall buildings around Broadgate and Finsbury Avenue eroding clear sky space around the dome reducing visual prominence of the Cathedral and appreciation of its architectural scale and composition.
- City Cluster curating concentration of tall buildings and maintaining sky space with the cathedral sustains visual prominence of the dome.
- Construction of the Shard 2009-2012 and tall buildings to the south of the Cathedral erode the skyspace and visually compete with the dome for attention. In some views from the north the Shard emerges directly behind the dome disrupting its silhouette.

River corridor:

- Secondary group of tall buildings around Finsbury visually attached to the drum and dome of the Cathedral as experienced from the SW in the river corridor challenging both the intended visual prominence of the Cathedral but also the clarity of the geometry of the dome, integral to the intended role of the Cathedral as an "ornament" to the city.
- Construction of Millennium Bridge House exceeding the St Paul's heights limitations erodes the consistency of the townscape to the south of the Cathedral which is historically significant as a result of this policy. It also obscures key architectural elements including the south pediment and associated statues, the carved decoration as well as the entablature and balustrade of the Cathedral as experienced from the river setting along the South Bank and from the Millennium Bridge diminishing its architectural effect.
- The construction of the Shard as the tallest building in London competes with St Pauls in views from the east.

Churchyard/close setting:

- The new Accessible entrance enhances the ability to experience the architecture and understand the historic significance of the cathedral for a greater number of visitors.
- Reconfiguration of Paternoster Square provides a colonnaded elevation to the churchyard and new connections to public spaces immediately to the north, enhancing the visual dominance of the Cathedral in its immediate setting and an ability to appreciate its architecture.
- New Change constructed with roof terrace providing views to the cathedral and framed views at ground level.
- New office development to the east (25 Cannon Street) with small garden containing a pool providing reflections of the cathedral; a very popular visitor spot.

9.40 The first two decades of the 21st century has seen the most perceptible change in the setting of the Cathedral in the form of the Eastern “Cluster”. The last decades of the 20th century had witnessed the beginnings of the emergence of tall commercial development, with Tower 42 (formerly the Nat West Tower 199 metres) constructed in 1981. The replacement Lloyds Insurance building by Richard Rogers followed in 1986, before the replacement of the bomb-damaged Baltic Exchange by 30 St Mary Axe (The Gherkin) which was completed in 2004.

9.41 The conscious decision to identify a geographical area within the City of London with the potential to accommodate tall buildings led to the creation of the “cluster” and was a means of attempting to mitigate and manage the potential impact of this type of development upon the settings of highly significant heritage assets including the Tower of London and St Paul’s. The form of the cluster has been the subject of some proactive curation by the corporation of the city of London, which identified an apex at 22 Bishopsgate (249 metres) around which other individually designed tall buildings would be located. These include 122 Leadenhall Street (238 metres); 40 Leadenhall Street (170 metres) and the outlier 20 Fenchurch Street. The relatively recent consent for 1 Undershaft establishes a new apex for the cluster at 304.9 metres.



St Pauls from Waterloo Bridge S end with the new Finsbury Towers developments appearing behind the NW tower and infilling sky space between the western towers and the dome. The reflective materials draw further attention and distract from the Cathedral

9.42 The relationship between the Cluster and the Cathedral is of particular relevance between Hungerford and Blackfriars Bridges, where the CoL Protected Views SPD recognises the importance of a clear skyline gap which should be retained, with taller buildings stepping up from this point. The relationship between Cathedral and Cluster is most acute on Waterloo Bridge and Hungerford Bridge (north end). The Processional Route to the Cathedral from Westminster is of significant influence for tall building development within the cluster. For example, it aligns loosely with Leadenhall Street and the need to retain clear sky space around the dome and western towers is clearly seen to inform in the profile of 122 Leadenhall Street.

9.43 To the immediate south the most radical change in the setting of the Cathedral has been the construction of the Millennium Bridge. This has, in a short life, become an iconic London view. It is a traditional vista composition comprising a broad panorama of coherent low-lying townscape anchored on a central axis terminating on the south transept of the Cathedral. It is one of the best places to view Wren's masterpiece in its wider setting amongst his complementary 'spire-scape' of spires and steeples which punctuate and relieve the (on the whole) low contiguous horizon line. This has been diminished by ad-hoc tall buildings of less distinguished architectural form around London Wall/Broadgate.

9.44 In the very recent past a secondary group of tall buildings has begun to emerge to the north-west of the Cathedral, centred along Finsbury Avenue, including Finsbury Tower (c 109 metres). In combination with development to the south west of the Cathedral around New Bridge Street and the Unilever building the ability to appreciate and understand the relationship between the dome and towers has been significantly eroded.





One of the less discussed aspects of change to setting has been a shift in the material colours and tones in the City, from red-browns to blue-grays, especially in higher buildings. This is illustrated here in the view east from the Stone Gallery in c.2003 and 2024 (picture credit: top - copyright Chris Redgrave; bottom - copyright Historic England).



Building heights in the City in 1938 (illustrated by number of storeys). Note also plot sizes



For an illustrative comparison, building heights in 2020 using LIDAR data coloured to approximate storey heights. Note also the change in plot sizes.



10.0
Contribution of the current setting

10.1 Historic England GPA 3 (Second Edition) The Setting of Heritage Assets

All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset.

10.2 This section of the Review addresses Step Two of the Guidance which is to:

Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

10.3 As recommended, this assessment addresses the key attributes of the heritage asset itself which have been set out in Section 4 above. The assessment is then organised broadly into the categories of physical contributions: intangible contributions, environmental contributions and then visual contributions or views.

10.4 The current setting of St Pauls can be most conveniently considered in terms of its

1. *London wide setting*, where the silhouette and form of the upper features, principally the dome and towers can be appreciated.

2. *The intermediate setting* which are generally those areas to the south and west although to the north the area around Farringdon also provides opportunities to experience St Paul's. In these locations, including

the river corridor to the south, the articulation of the dome and towers can be understood in addition to their silhouette. From the south bank the overall form of the Cathedral at upper level, from apse to west front, can be appreciated as part of the kinetic experience of the river corridor and the orientation and aspect of the building is most clearly appreciated.

3. *The close setting* of the cathedral which comprises St Pauls churchyard, its western boundary at the top of Ludgate Hill, the southern boundary along Carter Lane, the eastern boundary along New Change and the north Newgate Street. In these areas the formal architectural qualities of the design can be best appreciated, including the volumes and surface articulation, the decorative carving and details in addition to the dome and towers.

4. In addition, extending across the intermediate setting and terminating at the closer setting are the approaches to the Cathedral. These comprise the “Processional” route along Fleet Street and Ludgate Hill to the west, the approach along Cannon Street and Cheapside to the East and the approach over the Millennium Bridge from the south bank. The definition of the ‘Processional way’ – the combined approach along Fleet Street and Ludgate Hill is a helpful term to capture both the historical and experiential significance of this semi-formal urban composition. Latterly there is increasing awareness of the value of the long vista and approach of Canon Street from London Bridge, in which the Southwest Tower and later the South Transept of the Cathedral play a dominant place in the composition. These approaches are a kinetic experience that reveal the Cathedral in a series of often unfolding views enabling appreciation of individual elements of its composition. These can be framed by adjacent buildings or seen in oblique glimpses, with the full composition of the building only being revealed as the close setting is reached.

1: The physical surroundings of St Paul's in its wider setting

SB9: Summary of the positive contributions of the physical surroundings in the wider setting

- The elevated topography of the London bowl which contributes to and provides opportunities to experience the Cathedral in its intended symbolic and architectural roles.
- The ability to appreciate and understand the historic functional/ ceremonial relationships with the City of Westminster.
- The ability to understand and appreciate the architectural relationships between the Cathedral and the hugely significant legacy of Wren's work at Greenwich.
- The ability to appreciate the strategic landmark role of the three sites: St Paul's, Palace of Westminster and Greenwich.
- The ability to approach the Cathedral from the east and west along the river as was usual historically.

What can be appreciated in terms of architecture of St Paul's and other assets

Skyspace:

- The silhouette and forms of the major architectural elements of the Cathedral, principally the dome and towers. These are set within a complex skyline that has evolved over centuries but the elevated topography also allows the Cathedral to be seen in relation to the Victoria and Elizabeth towers of the Palace of Westminster to the west, illustrating the twin city origins of London.
- Where the horizon comprises the wooded ridges of the London bowl and the Cathedral dome breaks the horizon, the silhouette is particularly powerful and illustrates best the intended dominance of the building as an ornament to the city.
- Elevated views from other heritage assets within the wider setting allow the dome and towers to be seen against clear sky.

River corridor:

- The sweep of the river can be appreciated from high ground to the south-east with the dome framed by or within a group of taller structures.

Churchyard or close setting:

- The churchyard cannot be appreciated and seen from the wider setting because of the scale of intervening development.

10.5 The site of the Cathedral in the heart of the capital is in a part of London which has the greatest time depth in terms of history and archaeology. Westminster to the west and Southwark to the south are, with the City of London the three historic settlements formed in the earliest phases of the history of the capital. The change to the wider setting of the Cathedral(s) has been dramatic and extensive with once separate settlements around these historic centres being subsumed by the physical growth of London. Equally dramatic in terms of experience of the wider setting of the Cathedral has been the very recent (relatively) change to the financial centre of the City of London and the creation of the Eastern Cluster. The visual presence of the cluster as experienced in large areas of the wider setting of the Cathedral has undermined a key role of St Paul's by challenging its intended dominance in a London-wide context. An additional impact has been caused by The Shard to the south, particularly with regard to visual prominence of the dome of the Cathedral and the ability to appreciate its' geometry and silhouette.

Topography

10.6 The topography of London makes a major contribution to the significance of the Cathedral and also the ability to appreciate that significance. The bowl in which London sits provides high points and elevated areas around its edge from which the design, layout and three-dimensional form of the Cathedral could be appreciated. The position



Looking ESE from the Stone Gallery towards the high ground to the SE of London around Shooter's Hill in Greenwich; note the gilded finial of The Monument to the centre left of the middle ground. The turrets of the White Tower can also be discerned further away in the background (picture credit: copyright Historic England)

of St Paul's adjacent to what was for centuries the only crossing point of the river and elevated above it, relied on that local topography in part for its dominance. The earliest wooden London Bridge was constructed from the river terrace on the north bank of the Thames to the sandbanks that offered access to the south side of the river and it also had a harbour at its northern end. On rising ground at Ludgate Hill and Cornhill, Londinium developed and this topography was central to its later development.

10.7 The physical surroundings and relative position of the Cathedral to the hills of north and south London originally provided both a green foreground and backdrop in which the capital was appreciated. Within this setting the Cathedral was the dominant structure and its relationship with the Thames, the other major topographical feature of the capital was also apparent. The perceived scale of the Cathedral and the impression of its architecture was increased where it broke the skyline formed by the hills. This contribution is integral to an understanding of the significance of the Cathedral(s) and an appreciation of what it (they) meant to convey. Elements of this contribution can still be read through the urban form today where building heights are consistent and follow the landscape. The LVMF has, for example identified a number of views from Parliament Hill and Kenwood, but if you look out from the Stone Gallery of the Cathedral the higher ground around the London basin can be clearly experienced to the south and east, including Shooter's Hill and Blackheath.

The Thames

10.8 The physical relationship between St Pauls and the river is another distinctive element within the setting of the Cathedral and one which makes a positive contribution both to significance and the ability to appreciate that significance. The prospects afforded by the river corridor have long been appreciated and enjoyed. The role of the river as a major transport link, carrying significant trade as well as private travellers also facilitated the widest views of the Cathedral from within the heart of London. The river and the wharves along its north bank were the means of transporting and delivering the Portland stone for the construction of the Cathedral itself. The opportunities for understanding the Cathedral and its intended dominance remain particularly strong along the river corridor, and the experience of the relationship between the river and the Cathedral have been enhanced by the creation of new crossings throughout its history. The river effectively forms the historic southern boundary of the City of London and is one of the reasons for the choice of viewpoints for representations of the Cathedral and the wider capital for travellers and visitors over the centuries.



The river corridor looking NE towards St Paul's from Coin Street Community Pier

The sky

10.9 The sky space and, originally, expansive sky setting of St Paul's made the strongest contribution to understanding the geometry underlying its design. Detailed analysis of Wren's writings reveals the extent to which he understood and considered both the geometry of the dome but also the optics of the building as a whole. The counterpoint of the simplified profile and detail in the Dome and the exuberant design embellishment of the Western Towers was a deliberate contrivance of what he described as 'perspectiva'. Wren was interested in and understood how the building would be experienced and how the form of his dome as opposed to a steeple or tower, would add to the visual presence and primary role of his building in the London wide context. This understanding also informed the contemporary development by Wren and others of the City Churches whose towers came to define the skyline in combination with the Cathedral. His architectural approach was based upon ensuring the Cathedral formed the dominant point of the London skyline as a symbol of the unity of Church, Crown and State, but it was also seen in combination with the towers and steeples of the City Churches and the more substantial silhouette of The Monument. The role of clear sky space is therefore central to the significance and ability to appreciate the significance of these heritage assets both individually and in their various combinations.

10.10 It is the relationship of topography and sky space that enables the geometry of the dome to be expressed across the city as Wren intended. The careful consideration of shape and the considered use of the curve is best seen against clear sky without distraction and the changing form and silhouette of the towers is also best seen against clear sky. When originally designed, the statues were intended to be seen against clear sky to emphasize their silhouette and enable their architectural function to be expressed. Clear sky makes the strongest contribution to the architectural interest of the Cathedral and therefore reduction in sky space by obstruction or distraction, or otherwise confining this element of the setting consequently erodes its contribution to significance and ability to appreciate significance.

Relationship with other heritage assets

10.11 In the wider setting the relationship of the Cathedral with other heritage assets is appreciated largely in terms of their skyline presence. The river connections from Greenwich to the east enable the dome and towers to be appreciated in the context of Wren's other great works at Greenwich Hospital. The architectural formalities shared by the two sites adds to their respective significance. Appreciation of the Cathedral from the wider setting to the north enables it to be appreciated in combination with the Palace of Westminster and therefore the relationship between the twin cities of Westminster and London to be understood. These experiences also enable a greater understanding and appreciation of the contribution made by the processional route to the significance of the Cathedral which forms part of its approaches and to which Wren's western portico and vestibule respond. Both of these latter groups of heritage assets are inscribed World Heritage Sites and it is only in the widest setting of the Cathedral that the relationship of the three sites as Strategic Landmarks can be appreciated.

2: The physical surroundings of St Paul's intermediate setting

SB10: Summary of the positive contributions of the physical surroundings in the intermediate setting

- The topography around and elevated position of the Cathedral explain the siting of St Paul's embedded in the heart of the City which is a key element of both architectural and historic interest.
- The rising ground to the west emphasises the scale and intended dominance of the Cathedral.
- The river below to the south provides an open corridor extending for considerable distances east and west enabling an appreciation of the aspect of St Paul's and illustrating its' contribution to historic interest.
- The lower topography to the south enables an understanding of the overall architectural form of the Cathedral at upper levels from apse to west front and not just discrete elements.
- The approaches along the river and over the river include significant areas of open sky space that contribute directly to the visual prominence and the intended architectural effect of the design.
- Greater use of the river has enhanced appreciation of the Cathedral.
- Intervisibility with the City Churches and The Monument enhance significance.



St Paul's from the South Bank by Tate Modern and the Millenium Bridge providing an elevated pedestrian route across the river and aligned on the south transept of the Cathedral Photograph by the author 2023.

SB10 cont.

What can be appreciated in terms of architecture

Skyspace:

- On the skyline it is principally the towers and dome of the Cathedral. The articulation and massing of the towers can be understood in greater detail, and the rhythm of solid to void in the peristyle is now particularly prominent. The statuary along the entablature of the Cathedral can be appreciated and from certain areas, when against clear sky, silhouettes can be powerful.
- In the area of the St Paul's Heights policy generally the entablature of the Cathedral can still be seen in combination with the drum, dome and towers, although this too is being eroded.
- The south-west tower of the Cathedral is the most visually prominent element of the building in large areas of the intermediate setting to the east. The dome and tower are visually dominant and form the focal point of views to the Cathedral from the east, although they have to compete with increasingly scaled commercial development.

River corridor:

- The river corridor provides the ability to appreciate in greater detail the upper sections of the Cathedral below the cornice.
- In the angled views from west the form of the Cathedral appears more compact.
- From the north it is the dome and drum which can be seen but with only limited ability to appreciate their articulation.
- In the kinetic experience walking along the South Bank of the river the three-dimensional composition of the Cathedral changes and the visual weight of the western towers also changes, in particular the pattern of the voids and ability to see through them.
- Certain aspects enable the outline of the stone to be appreciated against clear sky.
- In these areas of the intermediate setting the role of the Cathedral as an historic landmark, recognisable and an ornament to the city is most clearly appreciated and expressed.

Churchyard or close setting:

- There are segments of the churchyard or close setting that can be experienced from the intermediate setting. These are mainly along the approaches to the building.
- The eastern end of the churchyard can be seen from Cannon Street and Cheapside but is appreciated as an element of an urban landscape set within a busy road network.

SB10 cont.

- The upper section of the apse, the drum and dome can be seen in a complex skyline comprising other, taller structures.
- On the western approach along Fleet Street the upper section of the west elevation and the drum and dome are variously revealed and obscured and also framed, by modern commercial development.
- A framed view of the south transept and the open space in front is provided from the south bank across the Millennium Bridge and high-level views from Tate Modern include sections of the Churchyard.

Impact of past change on the contribution made by setting to significance

- Changes to the setting including the creation of the Thames Path and Queens Walk to the south bank and the construction of the Millennium Bridge have enhanced the ability to appreciate the Cathedral, including the south transept.
- The creation of the Millennium bridge has provided a popular and exciting approach that links the Cathedral with the historic highway of the river, the realisation of an ambition that had been set out in the early years of the 19th century.
- Commercial development along Cannon Street is generally consistent in height and scale, although pressure to increase scale in recent years has increased visual distraction and reduced the prominence of the Cathedral.
- Developments in the sky space behind the Cathedral from the southern, river setting has eroded its visual prominence. Recent development to the north-west competes with the dome of the Cathedral, and in some parts of the setting appear to be visually eroding the geometric clarity of its form and intended effect.

Topography

10.12 The main topographical feature of the intermediate setting and approaches to the Cathedral is its' elevation. The approach from the west ascending Ludgate Hill which curves as it rises and gradually reveals the Cathedral, emphasises its scale and mass. The elevation in relation to the river is less pronounced and appreciate not least because of the elevated route taken by many visitors across the Millenium Bridge. The river corridor and generally flat south bank provides an open aspect i which the form of the Cathedral is instantly recognisable The later embankment of the river to the north side provides a consistent baseline above which the land rises, with development broadly appreciated as a series of "steps" obscuring the body of the Cathedral and above which the steeples and towers of the City Churches can sometimes be appreciated. This topography is particularly evident immediately to the south of the Cathedral in the area governed by the St Paul's Heights policy although the stepped arrangement of development is not as apparent in views directly opposite from the South Bank because of the redevelopment to that height limitation in buildings fronting the river.



St Paul's from Queen's Walk looking north and revealing the impact of the St Paul's Heights policy in preserving the ability to see the extent of the body of the Cathedral below the peristyle, dome and towers. Photograph by the author 2023

The river

10.13 The river itself makes a major contribution to the setting of St Paul's both in terms of providing a corridor which emphasises its visual prominence but also one which allows the Cathedral to be appreciated in combinations with other heritage assets. The river is now once again a major transport route after a significant period in which it was not used as a recreational resource because of environmental conditions. The network of river piers facilitates commuting and also the numerous leisure craft providing river tours for visitors. St Paul's is a major attraction on this route which extends downstream as far as the Greenwich barrier.

10.14 The Cathedral has always been separated from the river by development. That development was always subservient, although increasing in scale and height through the 18th and 19th centuries. Unilever House and the Faraday building in the early 20th centuries demonstrated the significant impact that increased height could have upon the visual prominence of the Cathedral, which was exacerbated by the monolithic massing of both buildings. The development along the north side of the Thames between Somerset House and Blackfriars is still generally subservient and integrated into substantial tree cover that provides a significant soft green foreground in river prospects from the west.



The Dome and towers of St Pauls in the river prospects looking east (downstream) from Waterloo Bridge with the substantial soft green foreground providing a foil to the city beyond. Photograph by the author 2023

10.15 This area of the intermediate setting provides the best experience of the Cathedral embedded in the capital which is why the overwhelming majority of the artistic representations of the building were located along its banks. The dome and towers of the Cathedral are experienced against clear sky at the northern end of Waterloo Bridge with the Eastern cluster in the City of London a distinct entity to the right in its setting. Moving south across the bridge the sky space around the cathedral expands and the visual prominence of the dome increases in response. Additional skyline features such as the steeple of St Brides, St Mary- le-Bow, St Magnus and the dome of the Old Bailey also become visible in an echo of the historic relationship depicted in the many historic views of London's skyline. The visual presence of the Cathedral on the skyline changes as one progresses along the south bank and its prominence is dependent upon the perceived extent of clear sky space around the towers, the dome and peristyle. Its impact as a building rather than isolated architectural elements is at its greatest between Blackfriars and London bridges.

10.16 Between Waterloo and London Bridges is the policy area for the St Paul's Heights which has had a noticeable impact on the form, definition and grain of foreground development in the setting of the Cathedral when viewed from the south. In the views from the Thames bridges, south bank and points to the west and east, the Heights protect views of the dome, western towers



St Paul's from the south bank looking north to Millennium House under construction and now obscuring the view of the entablature or main body of the Cathedral. Photograph by the author 2023

and, in order to retain a sense of the entire length of the Cathedral, the main entablature. The area of the Heights also extends laterally beyond the Cathedral to ensure that buildings do not crowd its setting on the skyline. In recent years the limitations of the policy have come under sustained pressure with some, limited, breaches of the height. Although limited in extent the impact is more significant which is demonstrated by the recently constructed Millennium Bridge House development that will, when completed obstruct the view of the entablature of the Cathedral and thus causes harm to an ability to appreciate its architectural significance.

10.17 A particularly strong contribution made by the setting in the river corridor are the fortuitous combinations of the Cathedral with later development. These combinations illustrate the historic significance of St Pauls and its influence on subsequent change in the City of London. Examples include the Cathedral in relation to Blackfriars Bridge, Tate Modern and Cannon Street Station, which both provide new places from which to experience the Cathedral and frame St Paul's in certain views.



The dome of St Paul's framed by the towers of Cannon Bridge Station from London Bridge. The towers of the station were inspired and influenced by Wren's City Church towers including those at St Benet and St Mary Abchurch both of which are located nearby. Photograph by the author 2023.

10.18 In the intermediate setting to the east the general consistency of modern commercial development along Cannon Street leads the eye to the Cathedral. An unfortunate consequence of departing from the consistency of height along the north side of Cannon Street is that development then obstructs the dome of the Cathedral as can be seen by the addition of the penthouse space at 31 Cannon Street at its junction with Bread Street and from further east.



St Paul's from Cannon Street to the east at the junction with Queen Victoria Street. The bronze clad penthouse element on 31 Cannon Street in the foreground collides with and obscures part of the important silhouette and form of the dome of the Cathedral. Photograph by the author 2023 (picture credit: copyright Historic England).

10.19 From the north part of the intermediate setting the Cathedral is largely obscured in terms of skyline becaus of the grain of development and topography. The notabl exception is within the London Borough of Islington. On Turnmill Street the dome and peristyle can be appreciate against clear sky and further west on Farringdon Lane the western towers of the Cathedral can be appreciated. The clearest skyline presence of St Paul's is that gained from Vine Bridge where the dome, drum and peristyle a seen against clear sky above the arches of Farringdon Station. The skyline presence of the dome and ability to appreciate its geometry is affected by the intrusions into the sky space including The Shard. The visual prominence and dominance of the Cathedral is reduced as the Shard has supplanted St Paul's as the focal point of the skyline.



The dome of St Paul's framed by the towers of Cannon Bridge Station from London Bridge. The towers of the station were inspired and influenced by Wren's City Church towers including those at St Benet and St Mary Abchurch both of which are located nearby. Photograph by the author 2023.

Relationship with other heritage assets

Architectural and historic: the City Churches

10.20 The relationship with the city churches is experienced very differently from ground level within the setting of the Cathedral, as opposed to being in the Stone Gallery of the Cathedral itself. At ground level the dome and towers of St Paul's either individually or collectively are appreciated with only glimpsed views of the towers and steeples of adjacent churches which are generally set against the busy skyline. The experience of the relationship between the assets is, as a consequence, often only partial.

3: The physical contributions to St Paul's significance in the close or immediate setting

SB11: Summary of the positive contribution of the physical surroundings in the close setting

- An area of great historic significance which has been a centre of Christian worship for over a Millennium and encompasses streets, buildings and spaces spanning a similar period enhancing an understanding of the historic significance of St Paul's.
- An area of great architectural significance, including one of the largest concentrations in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous non-designated buildings of high architectural quality from different periods enhancing an understanding of the architectural and historic significance of St Paul's and its enduring influence.
- An area of internationally important archaeology relating to the adoption of Christianity in Britain, and including the City's largest intact area and depth of archaeological deposits remaining of the medieval and Roman city.
- An area which attracts community events and public gatherings, particularly at the Cathedral and its churchyard.
- Green spaces to the south and east including the Festival Gardens.
- Spaces immediately to the south and east of the Cathedral within the railings providing areas to sit and rest.
- The western area adjacent to the steps allows for congregation/ meeting point and photography by visitors.

What can be appreciated in terms of architecture

Skyspace:

- The sky space within St Pauls Churchyard is generally clear of distraction providing the optimum conditions for appreciation of the dome, towers and statuary of the Cathedral. From the narrow medieval lanes to the south and newer routes created from the north the sky is framed by development.

River corridor:

- There are opportunities to appreciate the topography sloping down towards the river from the south side of the setting with views to St Benet's Paul's wharf enabling an understanding of how the Cathedral was constructed. The northern end of the approach from the river across the bridge reveals the topography and provides good opportunities to appreciate the south portico, transept and dome.

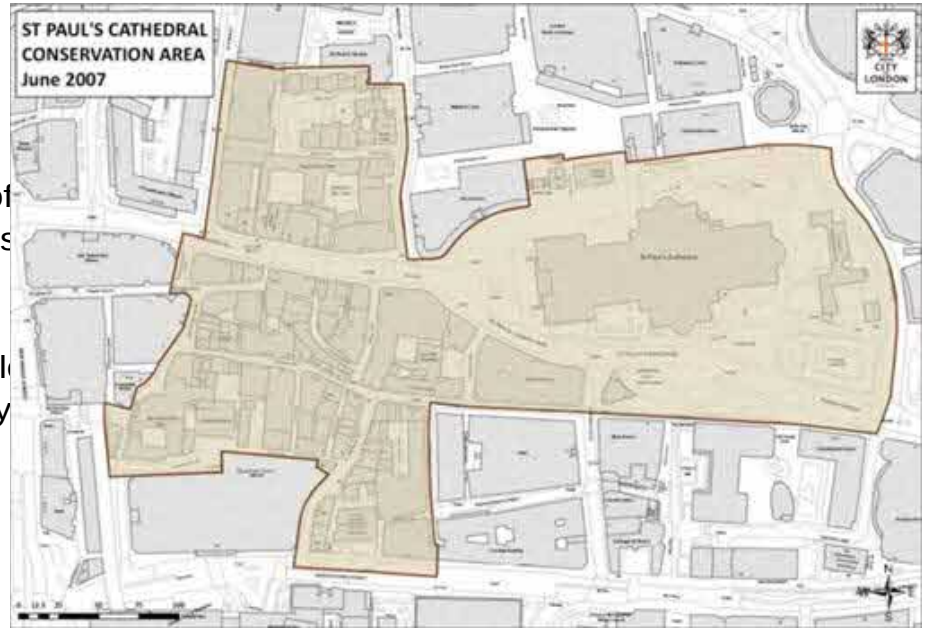
Close setting:

- The open southern section of the churchyard provides some of the best opportunities to experience and understand the design of the Cathedral, both the surface decoration, classical articulation and the bold massing. The towers and statues can be seen in close detail.
- The western porticoes can be experienced as the architectural arrival point of the Cathedral elevated and approached up the great stair. The churchyard allows a complete circuit of the Cathedral which can be experienced in combination with buildings of all periods and their details and architectural cross references can be appreciated and understood.
- The sheer scale and mass of Cathedral dominates and is appreciated as towering above.
- The smaller details of sculptural and carved decoration can be appreciated and the craftsmanship understood because of the ability to approach the Cathedral in close proximity along the south and eastern elevations.
- The sense of separation from the busyness of the setting particularly that to the south when in the churchyard spaces to the east of the Cathedral.
- The close setting allows the bells of the Cathedral to be heard, sometimes in combination with those of the contemporary City Churches.
- Moving around the close setting amplifies the understanding and appreciation of those buildings which have important functional and historical relationships with the Cathedral including The Deanery, Chapter House, St Augustine's Tower and St Paul's School.

Impact of past change to setting and its contribution to significance

- The Paternoster Square development has created positive new routes through to the Cathedral creating framed views and glimpses of the Cathedral, enhancing an appreciation and ability to understand its architecture.
- The relocation of Temple Bar providing a new connection between Paternoster Square and the churchyard enhances an ability to understand the architecture of the Cathedral but also its history.
- Paternoster Square is a successful urban space, used and enjoyed with a program of events providing good views of the dome, drum and towers of the Cathedral.
- The new entrance ramp at the north transept provides greater accessibility to both the architecture and history of the Cathedral.

10.21 The basic topography of the immediate setting of St Paul's is of land sloping away to the west and south, which can still be experienced, and the Cathedral and its close setting are physically as well as symbolically at its summit. The natural slope of the ground south of Ludgate Hill towards the Thames significantly contributes to the character of many streets, particularly south of Carter Lane, with buildings stepping down along each street. Where streets such as St Andrew's Hill and Addl Hill slope to the south, the roofline becomes particularly visible when viewed from the north, adjacent to the location of the churchyard, with dormers chimneys and roof extensions taking an additional prominence. The intricate grain and skyline contrasts with the scale and space of the Cathedral in close proximity.



Conservation Area boundary Map taken from the Conservation Area Character Summary and Management SPD © Corporation of the City of London

10.22 The most recent previous formal assessment of the close setting of the Cathedral is contained in the St Paul's Cathedral Conservation Area Character Summary and Management SPD produced by the Corporation of the City of London in March 2013. The summary characteristics of the area identified in the appraisal includes its great historic significance as a centre of Christian worship for almost 1400 years and an area with a large concentration of listed buildings in addition to many non-designated heritage assets. The archaeological importance of the area is also identified as being of international significance in relation to the adoption of Christianity in Britain as well as containing, in terms of extent and

depth, the largest area of deposits within the Corporatio of the City of London relating to its medieval and Roma predecessors.

10.23 The setting described in 2012 was an area where the urban grain varied from tightly knit historic streets and alleys to open spaces around St Paul's Cathedral and churchyard; it is also one that was characterised by predominantly masonry buildings with traditional proportions and materials and which has a public realm which is enriched by a wealth of materials, features, monuments, public sculpture, signs, plaques, statuary, and other structures. The current setting has retained many of these characteristics.

The current experience of the churchyard progressing west along the south and east along the north side

10.24 To the south-west of the Cathedral two buildings of c.1900 follow the gentle curve of the street, with Portland stone facades embellished by features that subtly reference some of Wren's architectural motifs. No. 4 is well-proportioned and richly ornamented with a corner dome and classical detailing, while Nos. 5-14 (Condor House), the former Pawson and Leafs warehouse, has a wealth of surface detail to its imposing façade. The general form and scale of the buildings are echoed by the Paternoster Square development to the north which similarly curves so that the west end of the close setting is embraced within the two "arms" of later development.



Juxon House, part of the Paternoster Square development that frames the northern side of the western end of the churchyard. The road has been pedestrianised and covered with setts and trees planted in a formal arrangement. The scale, materiality and height of the building responds well to the earlier, 19th century commercial buildings that enclose the south side of the churchyard opposite. (see below)

10.25 These also frame the space at the western end of the churchyard which is a busy pedestrian area used as a through route but also a gathering place for visitors. The visitors mingle often forming queues up the western steps to the ticket pavilion and checkpoint controlling access to the Cathedral. In summer the steps are also used as seating. The atmosphere is bustling and often lively.



Condor House opposite defining the south side of the churchyard with the historic lane leading to the Deanery behind the Statue of Queen Anne and enclosing an area of pedestrian activity (picture credit: copyright Historic England)

10.26 At the south-west corner of the close setting St Paul's Churchyard extends south as a narrow lane connecting to Carter Lane. On the west side just south of a kink in the lane stands the Deanery, set back behind a rebuilt boundary wall. The Deanery was one of the first buildings to be rebuilt after the Fire of London and its proximity to the Cathedral facilitated its important historic functional role with St Paul's. Although located close to the Cathedral the street is quiet, with a sense of enclosure but enabling an oblique view of the west end of St Paul's to be appreciated when revealed as the lane kinks towards the north-east. This visual connection emphasises the historic connections between the buildings and amplifies their significance. The scale of the portico of the Cathedral can be appreciated including its relationship with the steps and the open area to the west, whilst the North-west tower can also be seen. The dome is largely invisible. The portico, tower and sculptures on the west elevation at cornice level can all be appreciated against a clear backdrop in parts of the journey north along the lane but with commercial development to the north visually attached to its north-west tower. This dilutes the silhouette and appreciation of the architectural form of this important element of the west end of St Paul's.

10.27 As more of the Cathedral is revealed upon reaching the northern end of the lane, the architectural scale and articulation of the western portico and north-west tower become visually dominant and the relative scale of the



View looking NE towards the west front and NW tower of the Cathedral from outside the Deanery which extends down to the steps with the statue of Queen Anne (picture credit: copyright Historic England)

commercial development beyond appears diminished. The expanse of the steps seen beyond the road serve to physically and visually elevate the structure above the surrounding site and the street furniture, including the listed lamp standards and granite bollards become visually prominent. On emerging from the end of the land the listed Statue of Queen Anne is revealed and the bustle and activity in the western and northern areas of the Churchyard can be appreciated.

10.28 To the east, south of the Cathedral the setting has been opened up with the creation of Carter Lane Gardens which provide an important area of green space to the south of the Cathedral, arranged with formal curved lawns and borders that reflect the form of the south transept. They incorporate the St Lawrence Jewry drinking fountain which is a substantial Victorian Portland stone structure in an elaborate Gothic Revival style. The green quality of the space is important, offering some respite to the otherwise hard urban public realm elsewhere, but the gardens are incoherent and do not offer places to linger. The road severs the south transept from the arrival point of the important southern approach over the Millenium Bridge and visitors cannot connect easily with it. However, despite the severance, the South Portico with the carved Phoenix is visually prominent and the scale and mass of the Cathedral dominates.



The West end of the Cathedral seen obliquely from the north end of St Paul's Churchyard Lane; note the visual prominence of the steps, lamp standards and bollards and the urban public realm; the canopy on the steps is the first access point for visitors affects the experience of the steps and west porticos (picture credit: copyright Historic England).

10.29 In the south-west churchyard of the Cathedral and partly hidden behind the railings is a representation of the pre-fire cloister and chapter house completed in 2008, with new landscaping and reinstated railings enclosing the space (designed by Martin Stancliffe, former Surveyor to the Fabric). The space is one of the few where the history of the earlier building and the immensely important historic continuum of Christian worship represented by this place can be appreciated. At present it is somewhat disconnected although it is used by people as a space in which to eat their lunch.

10.30 The southern edge of the green space along Carter Lane is defined by modern commercial development, mainly of brick and of similar scale to the more historic commercial buildings to the west. The consistency of height and urban block is striking. The space in front of the buildings is very busy, cross crossed with paths and a considerable number of visitors approaching from the south having climbed St Paul's Hill. The open nature of the northern edge of this space provides a good opportunity to appreciate the scale and decorative detail of the body of the Cathedral, albeit screened in part by the railings.

10.31 The landscaped spaces to the south of the Cathedral are varied in design and character. Those spaces of note for their design and/or heritage value include the 1951 Festival of Britain Memorial Gardens which are partly enclosed by walls and terraces at different levels that separate them from the main paths running along the churchyard and Cannon Street to the south and those immediately adjacent to the St Paul's Cathedral School to the north. The historic line of Old Change is commemorated but generally the character and experience of this area is a little unresolved. A new public garden containing a mirror pool has been created outside of 25 Cannon Street. This pool enables a reflective view of the Cathedral, which is a popular new visitor attraction and this image of the Cathedral is one of the most widely shared across social media.

10.32 Heritage buildings within this area include various listed memorials, K2 telephone boxes, the modernist Grade II* listed St Paul's Cathedral Choir School and the attached Grade I listed tower of the former church of St Augustine by Wren. Many of these buildings appear alongside or in the foreground of views of the Cathedral. Without doubt the most significant of those relationships are between St Augustine's tower and the Cathedral particularly where the two are seen directly side by side where both have distinctive skyline elements. Similarly important relationships exist to the west with the spire of St Martin's Ludgate and the western towers of the Cathedral.

10.33 The east and north-east section of the setting of the Cathedral provides two distinct experiences, inside and outside the railings. This area has changed over time because originally the eastern boundary was very



St Pauls Cathedral seen from the east end of the mirror pool outside 25 Cannon Street. The oblique view of the south and east elevations of the cathedral are against clear sky which allows the statues over the south transept to be particularly prominent. The experience within the garden is one of enclosure with the cathedral set against a green foreground. Traffic noise does detract from what would otherwise be a relatively tranquil space. The Cathedral's drum and dome are seen in conjunction with the tower and spire of the former church of St Augustine also designed by Wren (picture credit: copyright Historic England).

closely adjacent to the east end of the cathedral when first constructed and remained in that position until the mid-20th century. The present relationship was created as part of the Post War reconstruction which incorporated parts of Old Change into the green space east of the Cathedral building[2]. Within the railings that now enclose the green spaces immediately to the east of the cathedral there is a sense of partial separation from the busy traffic dominated areas outside, although the space contains a busy route for pedestrians and those wishing to take advantage of the seating as well visitors and tourists exploring the space. The proximity t the Cathedral enables close inspection of the decorative carved elements around the lower elements of the façad but also enables the powerful scale and mass to be appreciated from below. The eastern churchyard has several monuments memorials and sculptures, some of which relate to the past history of the churchyard, for example the original location of Paul's Cross and its modern counterpart. Others with less direct relationships to the site of the Cathedral include statues of John Wesley and Thomas Becket.



St Paul's Drum and dome oblique view from the Junction of St Martin Le Grand and the A40 (picture credit: copyright Historic England).

[2] A detailed assessment of the eastern area of St Paul's can be found in the Eastern Churchyard heritage Statement January 2017 by Oliver Caroe, Surveyor to the Fabric for St Pauls: Map regression on P 55

10.34 The north-east area of the churchyard contains several large trees and more abundant mid-level planting. Within this area is the St Paul's Cross memorial designed in early 20th Century, with the gilded figure facing east. Th memorial is separately listed.

10.35 Outside the railings the experience of the setting east a north-east of the Cathedral is quite different. The conte is traffic dominated and the east end of the Cathedral is obscured at lower level by the St Paul's Choir School and the railings and planting within the churchyard. The overarching character of this area is of a modern commercial city. The setting is otherwise dominated by the road network and the junction of Cheapside with New Change, Newgate Street and St Martins Le Grand, the route from the north. Views through to the ruins of Christchurch Greyfriars now a garden illustrates the severe damage inflicted in the Second World War and is a tangible reminder of what could have happened to the Cathedral.

10.36 From the north along Newgate (A40) the character of the setting is generally commercial with office blocks of masonry construction forming the south side of the stre and obscuring most views of the Cathedral. The area immediately adjacent to the Cathedral and extending to Newgate Street was largely laid out in the late 1990's and early 2000's as a new urban quarter. It is evident from the design of the buildings and spaces that the role of the site as part of the setting of the Cathedral was influential in



The North transept and portico with drum and dome above framed in an axial view by new development along Queen's Head Alley (picture credit: copyright Historic England).

the design. Glimpsed views of the Cathedral are availabl from the north side of Newgate Street and generally the drum and dome are the visible elements. As an importa part of the commercial regeneration to the north of the Cathedral, new narrow connections, reminiscent of the historic alleys characteristic of the medieval city have been recreated providing framed views of elements of the Cathedral. These also provide pedestrian links to the churchyard along the north side of the precinct and the most significant of these connections are those along Queen's Head Passage, which is aligned on the north portico of the Cathedral and Rose Street, which curves south from Newgate Street before revealing the north-west tower of the Cathedral rising above Temple Bar as the focal point in the view.



Eastern section of the north side of the Cathedral Churchyard from above. The gilded figure on Pauls Cross stands within the landscaped area of the churchyard and the brick buildings (3-5) close the space down forming a through route towards the west.

10.37 The north side of St Paul's Churchyard is a space of two different characters. The eastern section is a pedestrian route between the railings of the Cathedral Churchyard and the brick buildings comprising numbers 3-5. The route is well used and opens up a little as the north transept is approached. To the north side is the flat roof above the Cathedral works yard which is used for storage and is a slightly uninviting space, although alternative sites for essential storage are not readily available.

10.38 To the west side of the north transept of St Paul's Cathedral, the space widens and activity becomes more varied. Pedestrians crossing from N-S mix with visitors milling around the area and those using cafés or using the new accessible ramped entrance into the Cathedral within the churchyard adjacent to the north portico. Immediately to the north and aligned with the north west tower the space expands further to form an entrance to Paternoster Square through the Temple Bar which was reconstructed on this site in 2004 after being moved to Theobolds Park in Hertfordshire from its original position in Fleet Street in the 1880s. The Bar was reinstated between two new buildings, Juxon House and Paternoster Lodge, the latter being a compact red brick building the design of which references the adjacent Cathedral Chapter House. The Chapter House (Grade II* listed) was built 1712-14 to the designs of Wren and in a familiar idiom with a domestic character using red brick with rubbed brick and stone dressings. It has been subject to various alterations, including post-War restoration in 1957 by Godfrey Allen.

10.39 The Paternoster Square development provides a mix of close and narrow pedestrianised routes linking from Newgate Street the paved area at the western end of the Cathedral that merges with the plaza at the front of the Cathedral. A colonnade forms a distinctive NW corner and whilst some have criticized the architectural style, in terms of scale and the definition provided to the churchyard it is a successful building. A particularly important component of the success of the development are the new views of the north elevation and dome of the Cathedral that were created and the sensitive relationship with the retained historic Deanery and the re-introduced Temple Bar.

10.40 Paternoster Square itself is a successful urban space, similar in character to urban squares found in other European cities and therefore reflecting the inspiration and ambitions of Wren in terms of the role of his cathedral in the rebuilt city. The space is well used both as a through route, but also for social gatherings including - Christmas markets, watching Wimbledon and other sports tournaments; or using the square for table tennis. It is the most successful urban space within the close setting of the Cathedral in many ways.

The close setting or Churchyard at night

10.41 Within the churchyard at night, St Paul's is appreciated in a still generally busy and active, artificially illuminated setting. The strongly directional lighting focussing on the crossing contrasts with the more even light wash of the south and west elevations of the Cathedral. The combination makes the building appear calm and coherent in contrast to the scattered lighting of adjacent buildings. The colour, or heat of the lighting als distinguishes the building from its setting, reinforcing the identity of the Cathedral as distinct from the largely commercial urban context.

10.42 In the intermediate setting, the lighting of the Dome and peristyle is of particular importance enabling these features to remain visually prominent against the sky in the context of many more tall buildings adjacent to the Cathedral in the cluster.



St Paul's at night from Ludgate Hill at the junction with Ludgate Circus, note the strong contrasts of the illuminated peristyle and dome against the night sky and the even wash of light over the west portico below (picture credit: copyright James Newton).



St Paul's at night from the south-east with the lighting of the public realm, including the road contrasting with the light above on the Cathedral (picture credit: copyright James Newton).

The approaches to the Cathedral

10.43 The approaches to the Cathedral, provide the strongest contribution to understanding and enjoyment of the architecture and history interest for many visitors to the building. The approach to the St Paul's was historically part of its ceremonial and liturgical significance. The east-west alignment was important for liturgical practice but also related to the historic morphology of the early medieval city with the royal settlement of Westminster to the west allowing the monarch to be greeted at the west end of the Cathedral and formally admitted into the City of London. The alignment also presented the greatest opportunities for the form of the cathedral(s) to be appreciated by those approaching from north and south and across, originally, the only bridge over the Thames.

10.44 Today the approaches can be broadly divided into character areas.

1. The approach from the north is through the financial and civic areas of the city. The Cathedral is largely invisible until the A 40 is reached, because of the grain of the setting; with the notable exception of mid-range views from the London Borough of Islington. These have been identified for management through the St Paul's Heights policy (see*paragraphs* 6.23-6.24 above).

2. The approach from the east is along Cheapside, Cannon Street and the associated commercial retail areas. The experience is dominated by the width of the roads, traffic and the major junctions just east of the Cathedral.

3. The approach from the west is along Fleet Street and the Processional Route and is a bustling urban context, dominated by commercial and retail activity and heavily affected by traffic.

4. The approach from the south and primarily along the river corridor is mainly via the Thames Path and Queens Walks which is more open. It is still a busy urban context but one characterised by pedestrian movement and recreational activity. It is a kinetic experience that involves a journey from Waterloo and Hungerford Bridges to the west and extending to London Bridge to the east. In making this journey the Cathedral is an almost continual presence, its precise relationship to the river changing in response to its bends. The Cathedral disappears behind the bridges over the river and occasionally is framed by them in an almost picturesque manner.

The approach from the North

10.45 The Cathedral is a skyline presence in mid distance fro the area around Farringdon, but otherwise is generally not appreciated in the northern areas of its setting. Upon reaching the A40 which runs along Newgate, glimpsed views of the dome set within a largely moder commercial context are available. It is not until the ne routes that have been created as part of the Paternoste Square development are reached that there is a positive urban relationship between St Paul's and its setting to t north. Overall, the northern approach to the Cathedral i the most fragmented.

The approach from the East

10.46 From the east the approach is along Cheapside and Cannon Street with the Cathedral at an angle closing the view. The dome, south transept pediment with its statues and the south-west tower of the Cathedral are all seen as the dominant skyline elements, with the mos visually prominent, because of the urban grain, being the south-western tower. Further north the approach along Cheapside is much wider, and dominated by retail activit New Change is a positive addition at the east end of th street which provides new framed views of the Cathedra at ground level and elevated views of the Cathedral and particularly the drum and dome from its roof.



East end of St Paul's Cathedral seen from within New Change (picture credit: copyright Historic England).

The approach from the West

10.47 The ability to first experience St Paul's as the terminus of the Processional route from Westminster along Fleet Street is just east of the junction with Fetter Lane at Crane Court. At this point Fleet Street curves towards the south-east and the Dome and peristyle of the Cathedral begins to emerge on the skyline. The spire of St Martin's Ludgate Hill is in front and just to the side of the north-west tower. To the north (left) the Eastern or City cluster is a significant element in the skyline, its' southern edge formed by the incline of the "Cheesegrater" building on Leadenhall Street. This softens the otherwise abrupt juxtaposition of development on the skyline and provides a greater area of sky space around the dome.

10.48 Proceeding further east along Fleet Street the perceived distance between the cluster and the Cathedral increases as the full extent of the drum, peristyle and dome of St Paul's is revealed to become the dominant feature of the skyline. The relationship between the cluster, the Dome and North West tower of the Cathedral and the spire of St Martin's Ludgate Hill is a dynamic one with all four elements changing position as one progresses east.
As Fleet Street drops down to reach Ludgate Circus the cluster recedes, its lower elements increasingly screened by development in the foreground whilst, conversely, St Paul's becomes the dominating skyline presence.

10.49 The foreground of the final stage of the route from the west to the Cathedral is dominated by the topography rising up Ludgate Hill which underpins its significance and enhances its architectural effect. Commercial buildings of masonry construction rising to a common height of five storeys provide a consistency of grain that is subservient to the Cathedral. The effects of perspective result in the development flanking Ludgate Hill appear to be consistent with the level of the entablature of the Cathedral, particularly along the south side. The spire of St Martin's Ludgate is a conspicuous feature in the setting that breaks the skyline alongside the dome and the south-west tower of the Cathedral at the foot of Ludgate Hill. Progressing up the hill the dome of St Paul's recedes from view and the south-west tower and spire of St Martins become the dominant elements until the curve of Ludgate Hill once again takes effect and the dome re-emerges to be appreciated in combination with the tower and the lantern and spire of the church. At the crest of the hill in the close setting, the tower of St Martins recedes and the west front of the Cathedral dominates and is framed by masonry buildings; early 20th Century to the south, early 21st Century to the north.



St Paul's from the west and the skyline from about half way up Ludgate Hill (picture credit: Historic England).

The approach from the South

10.50 These are described in paragraphs 7.14-7.17 above, but in addition a fulcrum for many visitors is the Millennium Bridge which provides an elevated pedestrian approach to the south side of the Cathedral and echoes the tradition of pilgrimage to great ecclesiastical sites. It is a busy and active route, continually photographed and is a positive intervention into the setting of the Cathedral that enhances its significance and the ability to appreciate the building. The bridge is a realisation in a more modest form of earlier, grander, urban planning that sought to establish a direct link between St Paul's and the river immediately to the south.



The Millennium Bridge and St Paul's Hill from the Stone Gallery linking with Tate Modern and The Globe on the South Bank; the most popular pedestrian visitor route to the Cathedral

Environmental contributions of the setting of St Paul's

10.51 The wider setting provides opportunities to appreciate and experience the Cathedral as part of the panorama of London, almost as an object. In locations including Parliament Hill, Primrose Hill and Kenwood the green space adds to the sense of separation from the intense urban activity which is characteristic of the intermediate approaches and close setting of the St Paul's. These spaces are not always tranquil but do enable contemplation of the building in a manner that is not possible elsewhere within the setting. Additional locations in the south London boroughs including Lambeth, Southwark, Greenwich and Lewisham also afford similar experiences.

10.52 The intermediate setting and in particular the river corridor provide the most popular route for visitors. The cultural attractions along the South bank including the Hayward Gallery, the National Theatre, Tate Modern and The Globe all provide an exciting and intellectually stimulating context within which to experience St Paul's which is generally visible across the river. The recreational experience of walking alongside the river and then crossing over on the Millennium Bridge make positive contributions to understanding both the architectural interest of the Cathedral but also its enduring cultural and symbolic values.

10.53 Although the approach and processional route from the west is of immense historic significance, environmentally it is less satisfying. The busy urban environment with significant impact from traffic does not allow spaces to linger and appreciate the Cathedral until the churchyard or immediate setting is reached. The Paternoster Square development provides a calmer urban environment whilst the western area in front of the steps and porticoes of the Cathedral are usually very busy with excited visitors.

Views enabling appreciation of St Paul's

10.54 Where views from the elevated topography within the setting remain, they represent a strong positive contribution to the significance of the Cathedral. There are examples where this has been recognised in the context of formally designated views both strategic and local, for example in the Southwark Local Plan or the views from Blackheath. But in terms of the contribution of these views in experiencing the asset, these locations and any others like them are the closest one can get to the original setting in topographical terms. They make the strongest contribution to understanding the impact that the Cathedral must have had when originally completed and are the echoes of the earlier experience in terms of the relationship of both the current St Paul's (and its predecessor) with the wider city.

10.55 The formally designated views, both strategic and local that have already been identified in development plan policy are: LVMF Views 1-6 (Strategic Panoramas) and View 9 Strategic Linear. "Local" views include those identified by the boroughs of Islington, Lambeth, Southwark, the City of Westminster; and of course, the Corporation of the City of London (*Appendix NPBM 4*) In all of these it is primarily the skyline presence of the Cathedral and in particular the drum and dome that are identified as the key landmark in the views. The policies accompanying these views all seek to ensure that the visual prominence of the Cathedral is sustained and protected. It is probable that there are other places where similar views are available although they have not yet been formally identified; including from Forest Hill and area to the South-East across the river.

10.56 The series of kinetic views experienced in the journey from the north bank of the Thames by Somerset House in the west and arriving at London Bridge to the east provide the best opportunities to appreciate the Cathedral and understand its relationship to the topography of the city but also its central location. This area of the setting also provides good opportunities to appreciate the Cathedral in relation to other buildings, including the City Churches which amplify an understanding of its architectural and historic significance. Elevated views from sites such Tate Modern, Tower Bridge and The Monument provide opportunities to experience the combinations of these heritage assets from a different perspective.

10.57 Two new views of particular importance have also been created in the 21st Century. The Millennium Bridge has provided an approach and view that is directly informed by the plan form and orientation of the Cathedral and represents the fulfilment of a long-held ambition to link the building with the river. It does so in a highly successful manner. Of the east within the close is setting of the Cathedral, the view from within and on top of One New Change both frame and also rise above the traffic dominated setting around the apse of the Cathedral. The views from the roof reveal the power and grace of the cathedral and are unique in being approximately aligned with the entablature of St Paul's so that the drum, Peristyle and dome of the Cathedral are seen against a clear sky in all their majesty. New positive interventions into the setting of the Cathedral to the north have also introduced new, framed views of the north transept along Queens Head Passage/Canon Alley and through Paternoster Square.





New views of St Paul’s from New Change

Views of St Paul's at night

10.58 The views of St Paul's at night are the result of a combination of illumination from surrounding buildings, the public realm and lighting of the Cathedral itself. In the close setting of the churchyard the illumination of the cathedral, in particular the peristyle and dome above is seen in strong contrast to the night or dark sky.



St Paul's at night from the Festival Gardens to the South-East. The dome and peristyle are seen contrasted against the sky, whilst the even light washing over the elevations below make the building appear calm and coherent in contrast to the scattered lighting of adjacent buildings (picture credit: copyright James Newton).

Experience of the setting from St Pauls: Stone Gallery

10.59 Part of the historic significance of St Paul's has been its role as a visitor attraction from the time of its completion. An important element of the experience was the ability to access the Stone Gallery and enjoy what were originally expansive views across London. The Gallery remains accessible today and provides extensive views across London, reaching as far as the wooded ridges that frame the London Basin.

10.60 The elevated viewpoint also enables direct visual connections to be made with other important heritage assets including the City Churches, The Monument and The Old Bailey. This enables an appreciation of the architectural influence of the Cathedral upon later buildings which amplifies their significance. The ability to see the dome of the Old Bailey from the dome of St Pauls is one example, but there are many others. The most significant historically are those between The Monument and the Cathedral, followed by those where the towers and spires of the Wren City Churches can be seen as a group. These include: St. Bride's, St Dunstan in the West and St Martin Ludgate to the west; St Mary-le-Bow, St Olave, and St Michael Cornhill to the east-north-east; and St Augustine, St Mary Aldermary, St James Garlickhythe and St Michael Paternoster to the east-south-east.



Views North and east from the Stone Gallery looking over Paternoster Square towards the wooded ridges of the northern heights. The Dome of the Old Bailey is prominent in the view which also includes the tower of Holy Sepulchre Church (picture credit: copyright Historic England)



Looking West: The west towers of the Cathedral with St Martin's Ludgate Hill with St Brides; but also, the tower of St Dunstan in the West; and the turrets and spires of the Royal Courts of Justice (picture credit: copyright Historic England).



Looking East-North-East: New Change and Cheapside with the towers and spires of Church of St Mary Le Bow; St Olave and St Michael Cornhill (picture credit: copyright Historic England).



Looking East-South-East: With the Tower of St Augustine; Tower of St Mary, Aldermary; Tower of St Michael Paternoster; Tower of St James Garlickhythe; The Monument; and the corner turrets of the White Tower (picture credit: copyright Historic England).

PART THREE:
Case Studies





Note for version v10:

The case studies will follow in the final version of the report. They will be selected to illustrate how the contribution of close, intermediate, and distant setting to the Cathedral's heritage significance, and to the ability to appreciate significance, can be assessed using the four step process recommended by Historic England in *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017).

It is hoped that this will provide a useful toolkit for practitioners engaged in preparing and assessing development proposals within the setting of the Cathedral.

PART FOUR: Appendices


TO LET

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Appendix 1: Distinction between setting and views

The distinction between setting and views is explained in two Historic England advice notes: *The Setting of Heritage Assets Historic Environment; Good Practice Advice in Planning Note 3* **(2017) and** *Tall Buildings; Historic England Advice Note 4* **(2022).**

Setting is more comprehensive and can include contextual elements which deal with the relationship of an asset to its surroundings both in the present and in the past. This includes the way a heritage asset or place is experienced and perceived today. The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

Views are a more defined element of setting, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to appreciating the setting of heritage assets and constitute part of an asset's significance.

Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether designed to be seen as a unity or as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration or do not make a significant contribution. The methodology in this report therefore includes reference to such designated views, but they are only used to illustrate a particular contribution made by an aspect of the setting. The identification of a positive contribution made by an aspect of setting does not rely on it being part of a designated view, either strategic or local.

Not all of the current views of St Paul's have been identified as part of the assessment of the contribution of setting both past and present and it is acknowledged that not all views make the same contribution to the significance of the asset, or indeed the ability to appreciate that significance. The views that are referenced in the report are generally those where the composition within the view was a fundamental aspect of the design or function of St Paul's; those with historical associations, including their viewing points; those with cultural associations and those where relationships between St Paul's and other heritage assets were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons.

Evolution of setting: the Historic England advice states:

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.

Appendix 2:
Legislation and policy for the management of heritage assets

Legislation

The legal context for the management of listed buildings and conservation areas is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended):

Section 66(1) provides that in 'considering whether to grant planning permission for development which affects a listed building or its setting, the Secretary of State (or decision taker) shall have special regard to the desirability of preserving the building or it setting or any features of special architectural or historic interest which it possesses.'

Section 72(1) provides that in 'the exercise, with respect to any buildings or other land in a conservation area . . ., special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

Case law concerning the duties in the Act is conveniently summarised in Appendix 1 to the Judgment of Holgate J in the *Save Stonehenge* case at paragraphs 4 to 9. The *Barnwell* judgement makes clear that "*preserving*" means "*doing no harm*" and that decision makers should give "*considerable importance and weight*" to the desirability of preserving listed buildings and the setting of listed buildings, and the character and appearance of conservation areas. A finding of harm to the setting of a listed building, or to the character or appearance of a conservation area gives rise to a strong statutory presumption against planning permission being granted.

Policy

The purpose of the planning system is to contribute to the achievement of sustainable development and the National Planning Policy Framework (NPPF) (*December 2023*). There are three dimensions to sustainable development and the planning system has an economic role supporting growth; a social role supporting strong, vibrant and healthy communities by creating high-quality built environment; and an environmental role by contributing to protecting and enhancing the natural, built and historic environment.

A decision-maker should identify and assess the particular significance of the heritage assets that are affected by a proposal. They should take account of this assessment

[3] R (Save Stonehenge World Heritage Site Ltd.) v. Secretary of State for Transport [2021] EWHC 2161 (Admin)

to avoid or minimise conflict between the heritage assets' conservation and any aspect of the proposal. Great weight should be given to the conservation of designated heritage assets. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

Appendix 3:
Current policy framework for the management of views

Planning Authority	View type	Number and Location
Greater London Authority LVMF	Strategic Panorama	View 1 Alexandra Palace
	Strategic Panorama	View 2 Parliament Hill
	Strategic Panorama	View 3 Kenwood
	Strategic Panorama	View 4 Primrose Hill
	Strategic Panorama	View 5 Greenwich Park
	Strategic Panorama	View 6 Blackheath Point
	Strategic Linear	View 8 Westminster Pier
	Strategic Linear	View 9 King Henry VIII Mound
	Strategic River Prospects	View 10 Tower Bridge upstream
	Strategic River Prospects	View 11 London Bridge
	Strategic River Prospects	View 12 Southwark Bridge
	Strategic River Prospects	View 13 Millennium Bridge
	Strategic River Prospects	View 14 Blackfriars Bridge
	Strategic River Prospects	View 15 Waterloo Bridge
	Strategic River Prospects	View 16 Southbank
	Strategic River Prospects	View 17 Golden Jubilee Hungerford Bridges
LB Lambeth	Local Panorama	C (i) Brockwell Park N and NE
	Local Panorama	C (ii) NNE Norwood Park
	Local Panorama	C (iii) N Gipsy Hill

Planning Authority	View type	Number and Location
	Local Panorama	C (viii) N and E National Theatre terraces
	Landmark Silhouette	D (xviii) NE from Queens Walk
LB Southwark	Local Panorama	View 1 One Tree Hill
	Local linear	View 2 Nunhead Cemetery
	Local linear	View 3 Camberwell Road
	Local River Prospect	View 4 Kings Stairs Gardens
LB Greenwich	Local	View 1 Blackheath Scooters Hill
	Local	View 5 Eltham Park North
	Local	View 9 Docklands Panorama
	Local	View 10 Kingston Hill
LB Islington	Local	LV1 Farringdon Lane Clerkenwell Road
	Local	LV2 St John’s Street
	Local	LV3 Angel
	Local	LV4 Archway Road

Planning Authority	View type	Number and Location
	Local	LV5 Archway Bridge
	Local	LV6 Amwell Street
	Local	LV7 Dartmouth Park Hill
Corporation of the City of London	The Monument Views Study December 2020	
Corporation of the City of London	St Paul’s Heights Study Parts 1-7 published 2015	
Corporation of the City of London	Protected views SPD published 2012	

Greater London Authority: London View Management Framework (LVMF, 2012)

Relevant Panoramas

View 1 Alexandra Palace (2 viewing places). St Pauls is the Strategic Landmark in the view ad with a protected vista Relationship to the wooded hills and flatter land to the east is referenced.

View 2 Parliament Hill the summit. (2 viewing places) St Pauls and Palace of Westminster are the two LSIs in the view. In relation to view 2a it states *St Paul's Cathedral is set within a miscellany of buildings, in both its foreground and background. The dome and peristyle are visible, but some development in the background diminishes the viewer's ability to recognise and appreciate the landmark, particularly in poor weather conditions.*

View 3 Kenwood The Viewing Gazebo view 3A it St Paul's and Palace of Westminster are the 2 LSIs in the view. States: *St Paul's Cathedral, to the west of the City of London, is seen in front of a cluster of taller buildings at London Bridge, including Guy's Hospital tower and the Shard. The views of the Cathedral dome benefit from an absence of development in the foreground but development behind the dome compromises the viewer's ability to appreciate the landmark.*

View 4: Primrose Hill St Paul's is one of 2 LSIs in view. (2 viewing places)

4A1 is the relevant protected vista *The cluster of tall buildings in the City of London is partially obscured by towers at Euston. St Paul's Cathedral is framed by two of these towers but a third, lower tower, reduces the viewer's appreciation of the dome and drum.*

Background p 134 St Paul's Cathedral and its Western Towers are recognisable in this view largely because it is seen clearly against the sky and it is not dominated by development in its backdrop.

View 5 Greenwich Park (2 viewing places) 5A2 with the relevant protected vista-

St Paul's Cathedral and Tower Bridge are visible in the panorama. Adjacent to Tower Bridge, and to its right in the view, is The Monument to the Great Fire. The background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers. The sight line to the Tower Bridge and St Paul's Cathedral is unimpeded in the foreground, ensuring the two elements are seen as a composition. The ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama.

View 6 Blackheath Point *6A1 The dome and western towers of the Cathedral are visible, the former silhouetted against the sky, enabling clear recognition and appreciation of the landmark. Few buildings are visible immediately behind the landmark, such that the rising line of hills to the north are the dominant backdrop feature. The western towers of St Paul's Cathedral are integral to the viewer's ability to recognise and appreciate the landmark. Therefore, the Landmark Viewing Corridor of the Protected Vista from Assessment Point 6A.1 incorporates these features.*

The Tower of St Paul's Deptford is available in the view in combination with St Paul's.

Relevant Linear Views

View 8 Westminster Pier to St Paul's viewing place *8A two buildings that frame St Paul's Cathedral allow an unimpeded view of the peristyle, upper drum and dome, silhouetted against the sky. This is a key attribute of this view. The most southerly of the western towers of the Cathedral partially obscures the peristyle, while the northern tower is largely hidden behind the Royal Festival Hall.*

View 9 King Henry VIII's Mound Richmond

Relevant River Prospects

View 10 Tower Bridge Upstream – St Paul's and the two St L. There are visual relationships with the Monument, Churches of St Dunstan in the East, St Margaret Pattens and the Church of All Hallows

View 11 London Bridge (3 viewing points). Viewing point 11A upstream is the relevant one focussed on St Pauls- and with St Bride's church spire in setting.

View 12 Southwark Bridge (2 viewing places) the relevant viewing place is 12A1 upstream. The view is the result of the St Paul's Heights and effective control particularly in the foreground and middle ground. *The St Paul's Heights Limitations have played an important role in the development of the townscape setting around St Paul's Cathedral during the 20th Century. While respecting the Limitations, new development should also improve this townscape environment where possible.*

View 13 Millennium Bridge and Thameside at Tate Modern (2 viewing places both relevant)

The foreground of the view is dominated by the bridge and its structure, with buildings in front of St Paul's forming the middle ground. The south transept can be clearly recognised and appreciated, beyond the steps leading to the Cathedral. On the north bank

the dominance of the Cathedral in the townscape can be attributed to the effects on development of the St Paul's Heights Limitations, which ensure that the cornice line of the cathedral remains visible. The backdrop of the Cathedral is compromised by taller buildings including the Barbican towers.

226 The St Paul's Heights Limitations have also led to an unrelenting horizontal emphasis to the buildings in the middle ground, although this is relieved by the spires and towers of the City's churches, which can also be seen in the view.

View 14 **Blackfriars bridge** - Blackfriars Thameslink Station-

View 15 **Waterloo Bridge** (4 viewing places 2 upstream and 2 downstream –but kinetic more appropriate) 15B 1 and 2 relevant viewing points *The location provides important views east towards St Paul's Cathedral and the City of London. The river frontage buildings on the Westminster and Southwark sides of the Thames frame the middle ground views and the river dominates the foreground. The viewer's eye is drawn towards Temple Gardens, St Paul's Cathedral and the City's financial district. Both river banks are softened by trees in the foreground of the view. From the north end of the bridge, St Paul's Cathedral appears above the trees on the Embankment, with only the river and tethered boats also in the foreground. While the principal cluster of tall buildings in the City remains to the right of the Cathedral in views from Waterloo Bridge, recent developments close to the north-east edge of the City, have begun to create a second cluster on the left side of the Cathedral.* Dome and towers seen against clear sky

View 16 **South Bank** (2 viewing places) Most relevant is 16B 1 and 2 looking upstream from Gabriel's wharf St Paul's is centre of the view with clear sky *The three-dimensional form of St Paul's Cathedral can be fully appreciated in this view, with the main cornice and western towers both prominent. The dominance of St Paul's Cathedral and the visibility of its principal features are safeguarded by the St Paul's Heights Limitations, which prevent inappropriately high developments close to the Cathedral. Some existing tall buildings in the backdrop have started to damage the clarity of the Cathedral's overall form, and reduce the viewer's ability to appreciate it.*

View 17 Golden Jubilee/Hungerford footbridges. (4 viewing places 2 up and 2 downstream) More relevant ones are 17B 1 and 2 towards Westminster end of bridges. *St Paul's Cathedral and its western towers rise above the general townscape, although recent development reduces the quality of its setting in the view from the south-east side of the bridge. Either side of the Cathedral are the east and northern clusters of tall*

buildings in the City of London. The spire of St Brides and the dome of the Old Bailey are distinctive vertical elements seen against the sky.

Townscape Views

None

Local Plans

LB Lambeth 2020-35. Adopted 2021

10.125 Lambeth's topography plays an important role in dictating local views. The elevated land of the Norwood Ridge to the south of the borough and the relatively flat topography to the north means that most distant views are northerly; a number looking out across low-lying Southwark to the city beyond.

Policy Q25 A LVMF Views

The council will resist harm to the significance of strategic views (Panoramas, Linear Views, River Prospects and Townscape Views defined in the LVMF and listed in Annex 6) and secure improvements within them in accordance with London Plan policy HC4.

and

Policy Q25 B Views of local Interest including (C) Panoramas and (D) Landmark silhouettes

The council's views of local interest are set out in part's c and d below. In assessing proposals, the council will seek to protect their general composition and character from harm. Particular regard has been paid to the identification of views of the Westminster World Heritage Site. The following views are considered to be of local interest:

Q25 A views of relevance:

- See LVMF above

Q25 B views of relevance:

C Panoramas: The objective in identifying these views is to ensure that no foreground or middle- ground development is intrusive, unsightly or prominent in relation to the panoramic view as a whole, or landmark buildings within:

- C i. (c) views from Brockwell Park N and NE to the City- St Paul's identified as a landmark of note
- C ii. View NNE from Norwood Park (across LB Southwark) to the city- ability to appreciate the dome of St Paul's should be maintained
- C iii. View N from Gipsy Hill (across LB Southwark) to the city –St Paul's identified as an asset of high value and requirement is to maintain the ability to "fully appreciate" it
- C viii. View N and E from National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral- St Paul's is identified as a landmark alongside St Clement's Danes. Value of the view comes in part from the background of clear sky that forms (sic) their silhouette

D Landmark Silhouettes: The objective in identifying these views is to ensure that no development obscures or is intrusive, unsightly, visually dominates or competes with, and no background development harms, the silhouette of the assets in:

- xviii. View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark. The dome and towers are identified in the description and the building as described as having a "true landmark quality"

Details of the views are in a Draft SPD consultation closed (January 2021) check status

LB Southwark: the Southwark Plan: Fairer Future 2019-2036. Adopted February 2022

Policy P22 Borough Views

Borough views are significant views and panoramas that make a positive contribution to experiencing Southwark's environment within London, informing how we are located in an historic and important world city

Development should: 1. Preserve and where possible enhance the borough views of significant landmarks and townscape; and 2. Ensure the viewing locations for each view are accessible and well managed; and 3. Enhance the composition of the panorama across the borough and central London as a whole.

P22 Views of relevance:

- View 1: The London panorama of St Paul's Cathedral from One Tree Hill

1. Maintain the view of St Paul's Cathedral from the viewing place on One Tree Hill and not exceed the threshold height of the view's Landmark Viewing Corridor; and
2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;

- View 2: The linear view of St Paul's Cathedral from Nunhead Cemetery

1. Maintain the view of St Paul's Cathedral from the viewing place within Nunhead Cemetery and not exceed the threshold height of the view's Landmark Viewing Corridor; and
2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;

- View 3: The linear view of St Paul's Cathedral along Camberwell Road

1. Maintain the view of St Paul's Cathedral from the viewing place on Camberwell Road and not exceed the threshold height of the view's Landmark Viewing Corridor; and
2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;

- View 4: The river prospect of River Thames and its frontage, Tower Bridge and St Paul's Cathedral from Kings Stairs Gardens

1. Ensure that the River Thames and its frontage, and the key landmarks of Tower Bridge and St Paul's Cathedral are maintained within the view;

LB Camden: Camden Local Plan 2016-2031. Adopted July 2017 under review from 2022

Chapter 7 Design and Heritage

Views 7.26 A number of London's most famous and valued views originate in, or extend into, Camden. These are:

- views of St Paul's Cathedral from Kenwood, Parliament Hill and Primrose Hill;
- views of the Palace of Westminster from Primrose and Parliament Hills; and
- background views of St Paul's from Greenwich and Blackheath. –all LVMF

Para 7.28 The Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor. Developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces. They should seek to avoid buildings that tightly define the edges of the viewing corridors and not create a crowding effect around the landmark.

LB Greenwich: new Local Plan 2021 to 2036.

Regulation 18 consultation currently in progress until September 2023. Design and Heritage topic Paper out for consultation July 2023

LB Greenwich: current Local Plan Core Strategy. Adopted 2014

4.4.5 The Royal Borough will seek to preserve and enhance areas of recognised and valued character for Royal Greenwich and London as a whole, including historic landscapes, general landscapes, fine local and strategic views, open land, and wildlife habitats.

Policy DH4 Maritime Greenwich World Heritage Site: The Royal Borough will protect and enhance the Outstanding Universal Values (the 'Values') of the inscribed Maritime Greenwich World Heritage Site (the 'Site'). Development within it should protect and enhance these Values. Development within the buffer zone (as defined on the Proposals Map) and setting should not adversely impact on those Values, including views to and from the Site. [added emphasis- explore relationship to St Pauls and LVMF viewpoint)

Policy DH(g) Local views

Planning permission will only be given for development which would not have a materially adverse effect on the overall perspective and essential quality of the Local Views as listed below:

Relevant views

- View 1 Shooters Hill to central London? Shooter's Hill highest point –in the borough and one of highest in London
- View 5 Eltham Park N to central London?
- View 9 Docklands Panorama from the Wolfe Monument – reliance upon LVMF policy (under para 4.4.57)
- View 10 King John's walk to central London?

LB Tower Hamlets: Local Plan 2031 Managing Growth and Sharing Benefits. Adopted January 2020

Policy D.DH4 Shaping and Managing Views

Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted.

8.43 Views are important elements of townscape and local character, and provide a good test of the contribution that a development makes to a place. Townscape views can be valued for a variety of reasons, but often the most valued views will feature a prominent building that terminates a vista, acts a focal point or establishes some other form of spatial prominence. Such landmarks help to define and identify places and are considered to be a key component of high-quality urban design. The policy identifies: a. A skyline of strategic importance which is observed from multiple locations within and outside the borough, and b. A series of views and landmarks of a borough-wide importance: borough-designated views and borough-designated landmarks.

LB Islington: new local plan has been examined in public, major modifications consulted upon and minor modifications still to be completed (as of May 2024).

Relevant parts of the current local plan are therefore Core Strategy 2011 and updated DM policies adopted 2013.

DM 2.4 Protected Views

Within Islington there are local views of St. Paul's Cathedral and of St. Pancras Chambers and Station, which the council will protect and enhance.

2.4 D. Redevelopment of buildings that currently adversely impact on the local or strategic view are required to enhance the view and the ability to appreciate the landmark within the views, and not infringe on any part of the defined view.

These views are shown on the Policies Map. The local views protected are:

- LV1: View from Farringdon Lane/Farringdon Road / Clerkenwell Road - provides an opportunity for views of St Paul's Cathedral from a large space and can therefore not be considered in terms of separate viewpoints but as a viewing area. Views to St Paul's cathedral will be protected from all parts of this viewing area.
- LV2: View from St. John Street
- LV3: View from the Angel
- LV4: View from Archway Road
- LV5: View from Archway Bridge
- LV6: View from Amwell Street
- LV7: View from Dartmouth Park Hill

The views from Farringdon, St. John Street and Amwell Street of St. Paul's Cathedral form part of the original views protected in the 1930s by the City of London's St. Paul's Heights. Islington has maintained these original views and added to them over time. Protection across the whole of the local view needs to be maintained, requiring policy coordination between the City of London and Islington. It should be noted that there is a slight difference in height between the view the City protects and that Islington's policy protects for these three views. The height difference is to enable greater control of the development in the foreground of these views, allowing a larger viewing area and enhancing the appreciation of this important and attractive landmark. However, consistent with the City of London's St Paul's Heights, these three views terminate at 58.1m AOD (the height of the base of the cathedral's peristyle). The remaining local protected views terminate at 52.1m (the height of the base of the cathedral's drum), as per the mayor's strategic protected views of the cathedral)

City of Westminster: City Plan 2019-2040. Adopted April 2021 (*Under partial review for site allocations, affordable housing and retrofit policies – regulation 19 consultation due to finish 2023)*

40.15 / Westminster's unique townscape gives rise to some of the most familiar and cherished views of London. These include views of the River Thames and its frontages, the Royal Parks, as well as many other 'picture postcard' views of famous London landmarks.

40.17 / Local views are valued for their contribution to Westminster's distinctive character areas. These may contribute to the appreciation of important listed and other landmark buildings or distinctive skylines or groupings of buildings, historic parks and gardens, and views along or across the River Thames and Westminster's canals. Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city**We will publish a list of views of metropolitan importance and prepare guidance on their management.**

40.18 / New development should make a positive contribution to the characteristics and composition of significant views, both strategic and local, and improvement to significant views will be encouraged. This may include a proactive approach to view enhancement by repairing past damaging development. For example, opportunities should be taken to reduce the scale and impact of existing harmful buildings in the foreground or middle ground of protected vistas. Careful consideration of building materials and finishes can make proposals more sympathetic in long distance views. A proportionate approach to view protection will be taken, taking into account the significance of the view and magnitude of impact of proposals.

Policy 40 F Westminster views:

New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible

Protected vistas of relevance (LVMF):

- 4A1 Primrose hill Summit to St Paul's
- 8A1 Westminster Pier to St Paul's Cathedral
- 9A.1 King Henry's Mound to St Pauls

Westminster viewpoints (LVMF):

- 8 Westminster Pier to St Paul's Cathedral
- 14 Blackfriars Bridge
- 15A Waterloo Bridge
- 17 Hungerford foot bridges

Corporation of London: City Plan 2040

In preparation (previously City Plan 2036) planned consultation on revised draft December 2023- February 2024 Current Plan: City Plan 2015.

Draft 2036 plan

"Shape outstanding Environments" it states: The City's rich architectural and archaeological heritage will continue to be conserved and enhanced. Historic buildings will be sympathetically adapted to new uses where this is appropriate, enabling them to play their part in meeting the needs of the future City. New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting, backdrop and views of St Paul's Cathedral and the Tower of London.

Under Key Areas of change (vision) *3.4.5 Fleet Street and Ludgate: The role of Ludgate Hill as the primary approach to St Paul's Cathedral will be enhanced. Existing office accommodation will be retained and improved to provide flexible floorspace and spaces to meet changing business needs. Public realm and transportation improvements will deliver a high-quality environment which enhances the Principal Shopping Centre, the retail link and the historic lanes, alleyways, churchyards and spaces that lead off the processional route of Fleet Street and Ludgate Hill.*

Detail assessment: 7.7.2. The St Paul's Conservation Area extends up much of Ludgate Hill and surrounding streets and frames the approach to the Cathedral. Protecting and enhancing this heritage and views of St Paul's Cathedral will be a key consideration guiding future change. Fleet Street, Ludgate Circus and Ludgate Hill form part of the ancient processional route between Westminster and the City of London, providing iconic views of St Paul's Cathedral. Fleet Street, Ludgate Circus and Ludgate Hill are heavily trafficked, with narrow, often congested, footways but there is a strong sense of place resulting from the spaces and the architecture.

Proposed Strategic Policy S22: Fleet Street and Ludgate. The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC) will be promoted by: Protecting and enhancing the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route.

7.7.14. The Key Area of Change extends up to St Paul's Cathedral, an internationally recognised landmark on the London skyline which is sited at one of the highest points in the City and was London's tallest building between the early eighteenth century and the 1960s.

The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and the visitor experience is diminished by heavy traffic and associated highways clutter. There is potential for significant townscape enhancements and decluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral to enhance the setting of this iconic building.

Spatial Strategy objective 6: Focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site;

Policy HE1 Managing change to Heritage Assets supporting para 6.4.18. The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from **high level locations is a material consideration**.

Proposed Strategic Policy S12

6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; the protected vista and White Tower protected silhouette of the Tower of London; and Monument views and setting; all as defined on the Policies Map.

Proposed Strategic Policy S13: Protected Views

The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

- Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views;
- Protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features;

6.5.12. The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.

6.5.18. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street, Ludgate Circus and Ludgate Hill which forms part of the long established royal and state processional route between Westminster and the City. The views of St Paul's are kinetic, changing as the viewer moves along the length of this route, depending on the topography and alignment of buildings. Development proposals that could be visible from places along this route should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the silhouette of St Paul's Cathedral, and that they maintain the current clear sky background profile. An indicative view background centre line is shown on Figure 22 to highlight this issue. Further details will be set out in an update to the Protected Views SPD, which will include a ***Statement of Significance*** *and 3D digital modelling information to inform the future conservation and enhancement of this approach.*

Protected Views SPD adopted 31st January 2012

Operation of the Heights

2.12 The City Corporation has successfully protected views of St. Paul's Cathedral through the St. Paul's Heights policy for over 70 years. The successful protection and restoration of the views depends on the long-term, application of the Heights limitations to all sites within the area of control. The views protected by the Heights are sensitive to even small infringements. Consistent application of the limitations is therefore crucial to their successful protection of the views.

2.13 Development proposals within the Heights policy area must comply with the Heights limitations. The Department of the Built Environment can provide details of the relevant Heights limitations and can advise on their implications. Applicants will be expected to submit drawings showing the relationship between the Heights limitations and the proposed development to ensure compliance with the Heights. [my emphasis]

2.14 Some existing buildings exceed the Heights limitations and thereby partially obstruct the protected views of St Paul's. Upon alteration or redevelopment such buildings will be required to comply with the Heights limitations so that views obstructed at present will eventually be restored. Several infringing buildings have been redeveloped in compliance with the Heights, successfully restoring lost views. Examples include Vintry House (built in 1930 and demolished in the 1980s), and Sudbury House (built 1964 and demolished in 2003 as part of the Paternoster Square redevelopment).

2.18 In some of the views protected by St Paul's Heights tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases, tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge; and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. Within these views, new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views.

2.19 From other heights viewpoints where no tall buildings appear in the backdrop and the Cathedral is seen against clear sky, new development should maintain this situation

Appendix 4:
Select bibliography and sources

History and architecture

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Historic England: *London's Image and Identity: Revisiting London's Cherished Views*. 2018

Appendix 5:
Nigel Barker-Mills

Education/Professional Qualifications:

Nigel Barker BA(Hons) PhD. Dip Bldng. Cons IHBC, FSA

BA honours Degree (2:1) in History of Art and Architecture Reading University 1976-1979

1978: Courtauld Institute Scholarship to attend the Summer School in Venice and the Veneto led by (then) Anthony Blunt.
1979-1982 Awarded a State Scholarship to carry out research for a Doctoral Thesis on "*The Architecture of the English Board of Ordnance 1660-1750*" supervised by Prof Kerry Downes

1990: Post Graduate Diploma in Building Conservation awarded by the Architectural Association- dissertation subject *The Repair of Traditional buildings- a Question of Education?* -which examined the level of skills and knowledge available to contractors and owners of historic buildings in the SE of England.

1997: Elected, founding, Member of Institute of Historic Building Conservation (Membership Number 0004)

2014: Elected Fellow of the Society of Antiquaries of London

Professional Career/Experience:

1982-1986: Fieldworker for the Accelerated Resurvey of Lists of Buildings of special Architectural or Historic Interest – responsible for Surrey

1987-2000: Employed as Historic Buildings Adviser Surrey County Council providing specialist advice on the conservation and repair of historic buildings, areas and landscapes in Surrey. Key achievements include establishing Conservation Officers Group for Surrey (Chairman for 11 Years), establishing and publishing the first Buildings at Risk register for the County in collaboration with the 11 local planning authorities, providing expert witness advice for several major public inquiries including Wotton House -restoration of Grade II* country house and Grade I Registered Landscape, and one of the first successful prosecutions of an owner for unauthorised works to a listed building in the county. Providing training for the Surrey Planning Officers Society and Building Control officers on the management of historic buildings and providing expert advice for the Surrey Historic Buildings Trust Repairs Grant Scheme.

2000-2001: Historic Buildings Adviser for Waverley Borough Council

2001-2009: Historic Areas Adviser/Team Leader in English Heritage SE Region with responsibility for new development in historic areas and area grant schemes across Kent, E and W Sussex, Buckinghamshire, Oxfordshire and Berkshire. Key achievements include establishment of community-based conservation area appraisal projects in Surrey which became a national exemplar; community-based characterisation projects in Oxford working with the Oxford Preservation Trust and developing a model conservation area appraisal and management plan strategy in collaboration with Aylesbury Vale DC. During this time, I was identified as the EH National lead on Building in Context developing and publishing the BiC Toolkit in partnership with CABE and the Kent Architecture Centre and rolling the training programme out across the country. The Toolkit received a Planning Award from the RTPI in 2007/8. Other key achievements included supporting the development of Townscape Heritage Projects in Rochester and Hastings, monitoring HLF grant projects and commissioning a conservation plan for RAF Upper Heyford which led to its designation as a conservation area subsequently successfully appearing as an expert witness to oppose the local council's proposals to demolish nationally significant Cold War Structures and securing new uses for the former aircraft hangers. Supporting the regeneration of former railway workshops at Wolverton and the repair and regeneration of Bletchley Park with the Bletchley Park Trust

2009-2011: English Heritage London Head of Partnerships – taking the lead on Heritage at Risk for London and strategic partnerships with the Greater London Authority and the London Boroughs.

2012-2016: Planning Director for the London office (team of 44) responsible for the provision of specialist advice and grants, maintenance of the Historic Environment Record for London and the Greater London Archaeological Advisory Service. In 2010 appointed Historic Environment representative on the London Mayor's Cultural Strategy Group.

2016-to date- Established *Barker-Mills Conservation* specialist expert (heritage) consultancy with clients in the public and private sectors including Gascoyne Cecil Estates, Historic England NW and SE offices; Greater London Authority; Ryde School; Horsham District Council and various private developers.

Other roles:

1984-2000: Member, and for part of the time Secretary, of the Surrey Archaeological Society Buildings Committee

Elected Honorary member of the Arts and Crafts Movement Surrey- Chairman (2016-2018)

1987-2000: Trustee of the Watts Chapel. Involved in the successful campaign to repair the roof of the internationally significant Grade I listed Funerary Chapel in Compton, Surrey

Registered lecturer with the Department for Continuing Education Surrey University

Registered lecturer with Workers Education Association, NADFAS (now the Arts Society) and U3A teaching courses on architectural history and conservation

Chairman, Vice Chair and Treasurer of the SE Branch of IHBC at various times, serving continuously on the Committee from 1997- 2009

Editor and then Chairman of the Editorial Board for *Context* the journal of the IHBC and serving on Council from 2000-2006

Member of the New London Architecture Sounding Board 2010-2016

Member of Oxford West End Design Review Panel

Expert Assessor for Hackney Design Awards 2013 &2014

Appointed Chairman of the Heritage Advisory Committee of the Canals and Rivers Trust 2017

Member of the Advisory Board for Glasgow University- School of Urban Studies research project on *"Why Does the Past Matter? Emotional attachments to the Historic Environment"* 2017

Publications:

Contributed to "English Architecture Public and Private: Essays for Kerry Downes Ed Bold & Chaney

Contributed to "Nature and Tradition: Arts and Crafts Houses and Gardens in and Around Guildford" published GBC 1993

English Heritage Informed Conservation Series: Margate 2008 with Allan Brodie etc

Articles in *Context* including a review of the conservation legislation in first Decade of the 21st Century

Paper on: *Setting of Heritage Assets- A Practitioner's View for the Joint Planning Law conference Oxford 2015 (published proceeding Sweet& Maxwell).*

Historic England 2020 Conserving Georgian and Victorian Terraced Housing. Swindon. Historic England.

LONDON
REVIEW PANEL

Simon Gunasekara
Associate
DP9

14th October 2024

Dear Simon,

London Review Panel: 99 Bishopsgate

Please find enclosed the London Review Panel report following the design review of 99 Bishopsgate on the 14th June 2024. I would like to thank you for your participation in the review and offer ongoing Mayor's Design Advocate support as the scheme's design develops.

Yours sincerely,



Tom Holbrook
Mayor's Design Advocate

cc.
All meeting attendees
Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills
Philip Graham, Executive Director of Good Growth, GLA
Louise Duggan, Head of Regeneration, GLA

LONDON
REVIEW PANEL

Report of London Review Panel meeting for 99 Bishopsgate

Friday 14th June 2024

A site visit took place ahead of the review with a tour and briefings given by the client team and the Design Team.

London Review Panel

Tom Holbrook	MDA (Chair)
Farshid Moussavi	MDA
Julian Lewis	MDA

Attendees

Maurice Brenann	RSHP
Graham Stirk	RSHP
David Ravencroft	Andy Surgeon
Gerry O'Brien	AKT II
Ben Brodie	Atelier Ten
Richard Ward	DP9
Simon Gunasekara	DP9
Dan Scanlon	Brookfield Properties
Matthew White	Brookfield Properties
Juan Jose Sarralde	Townscape Consultancy
Joanna Park	City of London
Thomas Roberts	City of London
Amy Williams	City of London
Amrith Sehmi	City of London
Grace Jack	GLA Planning –Case Officer
Shamiso Oneka	GLA Design Unit
Kerry Branford	GLA Design Unit
Rachel Howsen	GLA Design Unit

Report copied to

Jules Pipe	Deputy Mayor for Planning, Regeneration and Skills
Philip Graham	GLA Executive Director of Good Growth
Louise Duggan	GLA Head of Regeneration

Confidentiality and publication

Please note that while schemes not yet in the public domain, for example at a pre-application stage, will be treated as confidential, as a public organisation the GLA is subject to the Freedom of Information Act (FOI) and in the case of an FOI request may be obliged to release project information submitted for review. Review reports will target publication to the London Review Panel webpage six months following the review unless otherwise agreed.

Overview

The applicant team is proposing a mixed-use commercial development in the Bishopsgate area. Their plan includes a developed public realm on the ground floor alongside commercial space across all levels. The project aims to enhance Bishopsgate and enrich the public realm within the City of London.

London Review Panel's Views

Summary

The panel does not support the complete demolition and rebuild of a building of this type which is less than 50 years old and urges that this approach is reconsidered. Notwithstanding this fundamental aspect, the panel gives its views on the merit of the proposed design in its own right.

The panel acknowledges the evolving nature of city views and, based on the views presented, finds no issues with how the building sits within the cluster, though they recommend further evaluation from Waterloo Bridge for coherence.

The panel urges a flexible strategy for public realm and site routes, safeguarding the building for future uses. The panel cites IBM Madison Plaza in New York as a precedent for good public spaces. The ground floors should be designed to benefit surrounding and wider communities, accommodating various activities beyond commercial interests. Nighttime safety considerations, flexibility of use, and programming space to enhance cultural production are also highlighted.

The panel proposes integrating reclaimed materials to reduce carbon footprint. and refining circulation in the cultural hub for better cohesion. They advocate for enhancing the cultural space's presence.

The panel recommends exploring a lighter structural solution to improve the street-level experience and clearly communicating the space's openness. They stress aligning with local guidelines and evolving the management strategy to better cater to diverse audiences. Enhancing landscaping beyond site boundaries and integrating existing building elements to enhance uniqueness are also suggested.

Overall, the panel provides insights to refine future stages, emphasising community-centric design, safety, flexibility, and contextual integration as key considerations.

Height and form in relation to the immediate and city cluster context

The panel recognises that the cluster curve for city views is always changing, so there is a collective consensus that there are no problems with the current cluster. However, further investigation should be considered for views from Waterloo Bridge to ensure there is coherence with the city cluster.

The sustainability and embodied carbon approach should reconsider the fact that this building is 30 years old, exploring better options to preserve the existing building to enhance the sustainability approach.

Public realm and routes through the site

The panel recommends that the team develop a comprehensive strategy for adapting the building for future use, emphasising the need for flexibility. As an exemplar case study, the panel suggests looking at IBM Madison Plaza at 519 Avenue in New York, which features an abundance of trees and open spaces that create a welcoming public realm. In contrast to the proposed ground floor, which could benefit from a more holistic and open design approach, the panel underscores that the public realm should serve the community rather than focus solely on commercial gain; it should provide spaces for users to sit, chat, rest, and wander.

The panel also highlights the importance of considering the safety of women, girls, and gender-diverse people at nighttime. Conducting a nighttime study would be beneficial in establishing the necessary features to ensure safety. The current design of the food court space is overly specific, whereas public spaces should be non-specific and flexible, allowing people to use them as they wish. The panel suggests to the applicant team to consider all methods and spatial organisation options for public realm management. This area is consumption-driven, but it would benefit from incorporating more informal workspaces and public realm areas rather than retail.

Public realm spaces should focus on cultural production, prompting a reevaluation of the ground floor design. The panel suggests diversifying the commercial uses on the ground floor, as limiting it to food and drink units restricts its potential. Additionally, introducing flexibility in the space and its uses would greatly enhance its appeal.

Public realm connections, and integration with surroundings

The panel suggests further exploration of materiality, drawing inspiration from architectural elements such as those found in the nearby church, could enhance the project's aesthetic and contextual integration. The panel critiques the current design of the cultural hub, noting that its circulation patterns feel disjointed and could benefit from redesign to create a more unified and amenity-rich environment. They recommend conducting additional investigation and design refinement specifically for the facade of the cultural hall space, highlighting its significant potential and its relationship with the main tower.

Additionally, the panel proposes transforming the cultural space into a more substantial, less transparent structure to imbue it with a stronger presence and character. They also suggest repurposing materials from the existing building to add historical depth and reduce the project's carbon footprint, thereby integrating sustainability into the cultural building's development.

Lastly, establishing a dedicated project team is proposed to oversee the public realm, focusing on both its design and management aspects to ensure its effectiveness and integration within the urban fabric.

Street level experience

The panel comments on the current appearance of the structure, noting its heavy and formal aesthetic. They suggest exploring alternative forms for the structural elements to create a lighter visual impact and a more inviting atmosphere for the public. Emphasising the need to clearly communicate that the space is open and welcoming to all, they underscore the importance of aligning with local authority guidelines and goals for public spaces during the design process.

Furthermore, the panel recommends enhancing the management strategy of the public realm, advocating for a deeper understanding of the target audience to ensure broad appeal. They stress the importance of ongoing development of the public realm, suggesting that lessons from the city's urban experience should inform its design.

The panel also addresses the landscaping strategy, noting its current confinement within the site boundary. They propose exploring options to extend landscaping into adjacent pavement and public areas, thereby creating a more inviting environment. Additionally, they encourage integrating the ground floor more uniquely and contextually with the site, suggesting investigations into incorporating elements from the existing building—whether through materiality, scale, texture, or other means—to enhance its distinctiveness and relevance to the surroundings.

Summary

The panel acknowledges their review arrives late in the application process but offers valuable insights intended to shape future refinements. Active participation in improving streetscape and public realms is emphasised over passive support for TFL and the city. The original building, dating back to 1776, is noted for its generous public space concept, which remains a collective asset to the city. There's a call for creating a public space that explicitly recognises its role and contributions to the community.

GREATER**LONDON**AUTHORITY

Planning report GLA/0480/S1

21 October 2024

99 Bishopsgate

Local Planning Authority: City of London Corporation

Local Planning Authority reference: 24/00836/FULEIA

Strategic planning application stage 1 referral
Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal
Demolition of the existing building and construction of a new 54-storey building (253.5m AOD) to provide commercial office floorspace (Class E) with a public market hall on the ground floor for flexible retail, food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); construction of a standalone 6-storey building (52.5m AOD) for flexible exhibition, performance, learning, community, and/or creative workspace (Class F1, Class (E(g)(i), Sui Generis); and construction of a 2-storey public cycle hub building (Sui Generis).

The applicant
The applicant is **Brookfield Properties,** and the architect is **RSHP.**

Strategic issues summary
Land use principles: The proposed high density office development would support the function of the Central Activities Zone and London's position as a World City. Provision of a standalone pavilion for cultural and creative uses is also strongly supported subject to public access and affordable workspace being secured.
Urban design: The City of London's Eastern Cluster is identified as a suitable location for tall buildings and the proposed building height falls within the relevant maximums for this site. The proposal represents high quality architecture and urban design. The ground level public realm would benefit from greater integration with adjacent developments.
Heritage: Less than substantial harm at a low level is identified to heritage assets, through harm caused to their setting. The harm is to be weighed against the public benefits of the scheme at the Mayor's decision-making stage.
Transport: The proposal would be considered acceptable subject to all the necessary highway and transport conditions and planning obligations being secured, including £1.29m towards improvements on Bishopsgate. Further work is required on the cycle parking quantum.
Energy and sustainable development: The energy strategy, circular economy statement, and whole life carbon assessment require refinements.

Recommendation
That the City of London Corporation be advised that the application does not yet fully comply with the London Plan for the reasons set out in paragraph 80. The applicant should address the outstanding matters addressed in this report.

Context

1. On 10 September 2024, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in issuing his response.

2. The application is referable under the following categories of the Schedule to the Order 2008:

   • *Category 1(B): Development (other than development which only comprise the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings in the City of London and with a total floorspace of more than 100,000 square metres; and*

   • *Category 1(C): Development which comprises or includes the erection of a building in the City of London and more than 150 metres high.*

3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Corporation to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk

Site description

6. The site is located on the corner of Bishopsgate (A10) and Wormwood Street. The City of London is entirely within the Central Activities Zone. The site benefits from excellent access to public transport with a PTAL of 6B, which is the highest.

7. The existing office building on the site is from 1976 (with significant recladding of the façade in 1993) and consists of a 4-storey podium with a 24-storey tower above. There is no public access to any part of the building. A public route through the building formerly existed as part of the City of London's pedway network, via a pedestrian bridge over Wormwood Street. However, the pedestrian walkway has been closed to the public for over 10 years and is now only used in case of emergency.

Details of this proposal

8. The proposal is to demolish the existing building above ground level, retaining the substructure, and construct a new 54-storey building (AOD 253.5m) comprised of commercial office floorspace with a public 'market hall' on the ground floor for retail and food and beverage.

9. A separate 6-storey building (AOD 52.5m) is proposed fronting Wormwood Street, to be called Open Gate, which would be a cultural pavilion providing exhibition and performance space, learning, community uses, and creative workspace. The application also proposes public realm improvement works, hard and soft landscaping, and highways works. The existing and proposed floorspace GIA is shown in Table 1.

Proposed Use and Use Class	Existing (GIA) sqm	Proposed (GIA) sqm
Office (Class E)	44,605	99,005
Plant, BMU, and ancillary space associated with the commercial floorspace including bike storage, parking, lockers, and showers (Class E)	9,257	40,840
Retail/Food and beverage (Class E(a)-(b))	482	1,237
Pavilion Building (Class F1, Sui Generis and Class (E(g)(i))	0	2,410
Public Cycle Hub (Sui Generis)	0	648
Total	**54,344 sqm**	**144,140 sqm**

Table 1: Existing and proposed floorspace (GIA)

Strategic case history

10. GLA officers held a pre-application meeting with the applicant team, also attended by the LPA, in January 2024 with respect to proposals to redevelop this site for a tall building of approximately AOD 240m. Written advice was provided on 22 January 2024.

Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015), the City of London Local Plan Proposals Map (2015) and the London Plan 2021.

12. The City of London Corporation is in the process of producing a new Local Plan ('City Plan 2040'). On 29 August 2024 the City of London submitted the proposed submission draft City Plan 2040 (Regulation 22 version) to the Secretary of State, and the draft Local Plan will now be subject to an independent examination.

13. The following are also relevant material considerations:

    The National Planning Policy Framework and National Planning Practice Guidance; and,

    A Written Ministerial Statement, for the ongoing consultation on the revised NPPF, was issued on the 30 July 2024 by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. The weight to be given to this, is a matter for the decision-maker having regard to the means by which it is proposed to effect a change in policy. The draft National Planning Policy Framework was also published on 30 July 2024. However, given it is still in draft and subject to consultation and change, the weight to attach to it is limited.

    Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including those on economic development, urban design, transport and sustainable development, can be found on the GLA's website here.[1]

14. The relevant strategic planning issues for this development are land use; the provision of flexible and affordable workspace, including cultural space; tall building impacts; transport impacts and mitigation; and climate change and sustainable development.

Land use principles

Office use

15. The proposed high density office development within the City of London's Eastern Cluster is acceptable in land use terms, in accordance with London Plan Policy SD5. Use of land for strategic functions (such as offices) is prioritised within the CAZ to meet demand for office space and facilitate London's continuing role as a World City. The draft City Plan 2040 identifies continuing need for office space and aims to increase the City's office floorspace stock by a minimum of 1.2 million square metres during the period 2021-2040.

16. The proposed building would deliver Grade A office space with a range of floorplate sizes ranging from 1,600 square metres to 2,000 square metres, all of which could be divided into multiple tenancies as required for different types and sizes of occupiers. A significant amount of office amenity space is provided throughout, including access to private winter gardens or outdoor terraces at upper levels. The requirement for flexible business accommodation, as per London Plan Policy E2, is met.

17. The development does not propose any of the office floorspace within the main tower to be let at affordable rates. Instead, the applicants are proposing to provide subsidised creative workspaces within the standalone cultural pavilion building on Wormwood Street. This approach is acceptable, as discussed below.

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507

The proposed building would also not have a high-level viewing gallery. However, in this instance officers consider that the unique and substantial public benefit provided by the cultural pavilion building stands to compensate for this.

Cultural pavilion building

18. The 6-storey standalone cultural pavilion building, Open Gate, will provide 2,400 square metres of floorspace including cultural facilities and affordable workspace. The following are proposed: (i) a gallery at ground floor level with public access and free exhibitions, (ii) a hall space for hire offering a mixed programme of free or affordable curated events, and (iii) studios offering subsidised and affordable creative workspaces.

19. London Plan Policy E3 and the draft City Plan 2040 encourage developers to provide affordable workspaces to meet demand, particularly from new and emerging sectors of the economy such as creative industries. As such, the proposal for affordable cultural workspaces is welcomed in lieu of affordable office space within the main tower and complies with Policy E3. Public access arrangements and affordability thresholds will need to be agreed with the LPA and secured in the S106 agreement.

Retail/ food and beverage use

20. The development proposes a public 'market hall' at ground floor level, offering retail, food and beverage and drinking establishments. This offer would contribute towards the City of London's ambitions to make the City an attractive place to visit all week long ('Destination City').

Affordable housing

21. Although not a London Plan requirement, the City of London's Local Plan and Planning Obligations SPD require office developments to make a financial contribution towards affordable housing-off site (which is usually invested in the Corporation's affordable housing programmes beyond the CoL boundary). The final contribution will be confirmed by the City Corporation and would ultimately be secured by way of a Section 106 agreement.

Urban design

Design review

22. The proposal has undergone a rigorous process of local borough design scrutiny and has also been presented to the London Review Panel, satisfying the requirements of London Plan Policy D4.

23. A CGI of the proposed building is shown below marked (1) with the consented development at 55 Bishopsgate marked (2) for context.



Tall buildings policy

24. The current City of London Local Plan Policy CS7 states that new tall buildings are expected to be located within the Eastern Cluster, and the site does not lie within an area identified as being inappropriate for tall buildings in current Policy CS14. Within the draft City Plan 2040, the site falls within the area identified as being suitable for tall buildings, as per Strategic Policy S12 and Figure 14. The proposed tower element also sits within the tall building '240 metre' height contour in Figure 15 (also known as the 'jelly mould'). For these reasons, the principle of a tall building on this site is supported in accordance with the locational principles of London Plan Policy D9 Part B.

25. Detailed information submitted relevant to the tall building impacts will be reviewed by the Corporation in accordance with London Plan Policy D9 Part C. Any necessary local mitigation must be secured as part of any planning permission. GLA officers' initial comments regarding the strategic visual, functional, environmental, and cumulative impacts are provided below.

Visual impacts: Strategic views

26. The submitted documents demonstrate that the proposed massing, architectural expression, and external treatments would result in a high-quality skyscraper that would be a distinctive addition to the City's skyline. The proposed building height appears to sit comfortably in the context of the Eastern Cluster and responds appropriately to its position at the northern edge of the cluster by virtue of its lower height relative to taller buildings emerging towards the centre, and its chamfered western elevation. Nevertheless, given its height, the proposed tower would be visible in many of the strategic views as identified in the London View Management Framework SPD, namely:

    1A.2 Alexandra Palace terrace

    2A.1 Parliament Hill

    3A.1 Kenwood

    4A.1 Primrose Hill

    5A.2 Greenwich

    6A.1 Blackheath

    10A.1 Tower Bridge

    15B.1 Waterloo Bridge, north and south

    16B.2 Gabriel's Wharf

    17B.1 Golden Jubilee Footbridge

    25A.3 Queen's Walk

    26A.1 St James's Park

27. In most of the above LVMF views, particularly the London panoramas, the new building will be viewed as a composite part of the Eastern Cluster and the cumulative effect will be insignificant.

28. In nearer views of the cluster from the south side of the Thames (for example 25A Queen's Walk and 10A Tower Bridge) the development would be mostly or completely obscured by the taller buildings in front, resulting in either none or a very minor impact to the view. GLA officers consider that the most sensitive LVMF views are 15B Waterloo Bridge and 26A St James's Park, and these are discussed below.

LVMF 15B Waterloo Bridge:

29. Regarding LVMF View 15B, the 'downstream' view from Waterloo Bridge provides an important vista towards St Paul's Cathedral, and the Eastern Cluster sits to the right-hand side of the Cathedral in this view. The LVMF view management guidance states that new tall buildings should seek to complement the City's Eastern Cluster with buildings of a height appropriate to their site, and of high architectural quality. New development which draws the cluster closer to St Paul's should preserve the Cathedral's relationship with its clear sky background and should not dominate the dome or the western towers.

30. Officers consider that the proposed development largely accords with the aims of the view management guidance for this view. The proposed development would edge closer to the Cathedral, but its clear sky backdrop would be maintained and the sloping design to the top of the building helps maintain the visual separation. The new development also has the benefit of obscuring a more complex group of buildings in the farther distance behind it, providing a 'cleaner' form to the edge of the Eastern Cluster that has a more positive relationship with the Cathedral.

31. LVMF View 17B.1 from Golden Jubilee Footbridge offers a similar but more distant view, and the impact is similar to the impact on the Waterloo Bridge view albeit to a lesser extent.

LVMF 26A St James's Park:

32. Regarding LVMF View 26A, this view looks east from the Blue Bridge in the centre of St James's Park. The important civic buildings in the middle ground either side of Duck Island enable the view to appreciate that this is an historic parkland in an important city location. Its value also lies in the picturesque nature of the view, and the skyline of spires and pinnacles (Horse Guards and Whitehall Court). The view management guidance states that development should not dominate or compete with either group of buildings and that any which are visible in the background should relate well to one or other of the groups and be of exceptional design quality.

33. The proposed development would be visible above the spires and pinnacles of Horse Guards and Whitehall Court and would not be obscured by trees at any time of year. The building appears to the left of the consented future development at 55 Bishopsgate, encroaching further upon the distinctive historic rooflines. Nevertheless, GLA officers acknowledge that these impacts are relatively minor in the overall context of LVMF View 26A, and the historic skyline and overall composition of the view would remain dominant. Any conflict with the view management guidance would be limited.

Functional and environmental impacts

34. Strategic functional impacts of the proposed tall building mainly comprise impacts to the road network, particularly the SRN and TLRN, and to public transport. See Transport section of this report. Functional impacts on telecommunications and aviation should also be robustly assessed by the LPA and avoided or mitigated. There should be no conflict with any airport safeguarding criteria, concerning either radar operations or physical height limitations.

35. The environmental impacts of the tall building are liable to be predominantly local. The surrounding tall buildings within the Eastern Cluster have the potential to cause wind tunnelling effects with adverse impacts for pedestrian comfort; the LPA should be satisfied that any instances of exceedances of safety thresholds are appropriately mitigated.

Cumulative impacts

36. Strategic cumulative impacts on LVMF views and heritage assets are considered in the relevant sections of this report. Strategic transport impacts have also been considered in conjunction with other major tall building developments taking place in the City and are discussed in paragraphs 48-66 of this report.

Layout, landscaping, and public realm

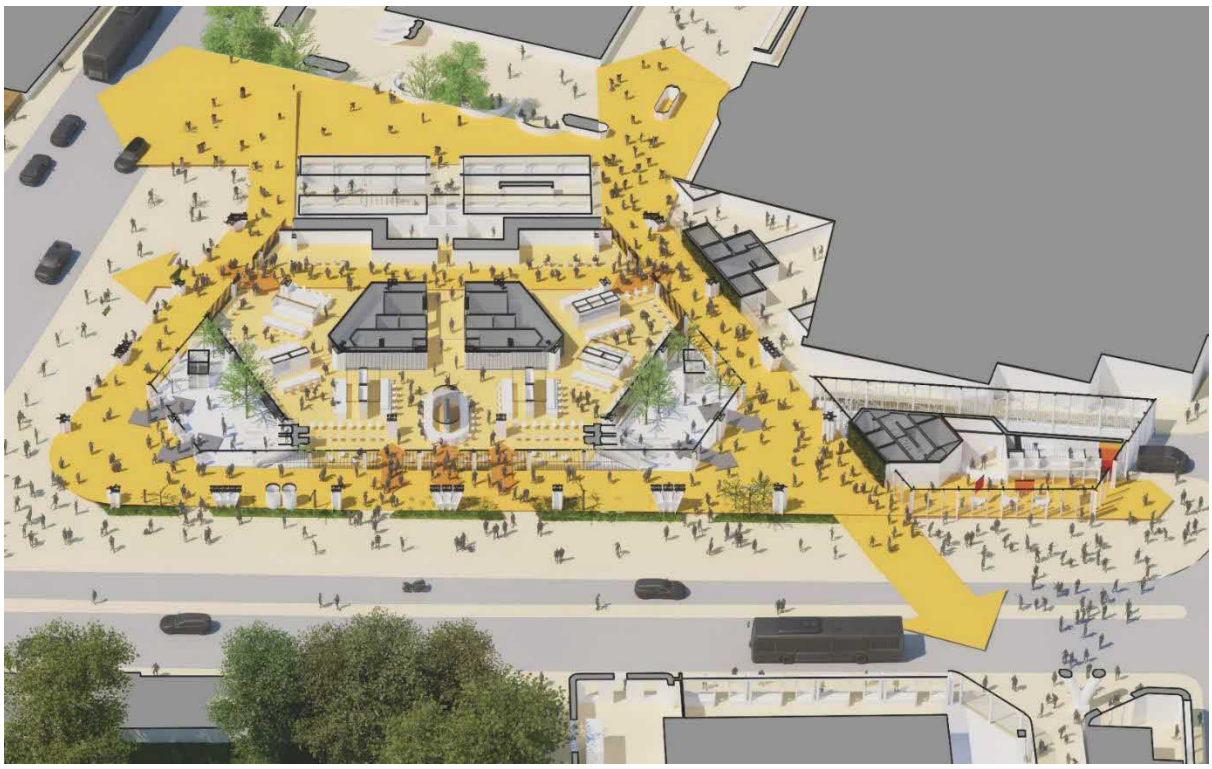


Figure 2: Proposed ground plane and associated spaces

37. On Bishopsgate and Wormwood Street, the ground floor building line is recessed beneath a colonnade, allowing the development to significantly increase pavement widths. The pedestrian environment would be further enhanced by soft planting which is supported.

38. The site layout also includes opening a new pedestrian route around the rear of the building, providing welcome permeability between Bishopsgate and Wormwood Street and, possibly, the public realm underneath the consented development at 55 Bishopsgate. This route requires carefully designed signage, lighting, and artwork to signify its presence and draw people in. If the street access points to this route are not obvious (particularly from Bishopsgate) then reduced legibility will impact on its desirability and inclusiveness. It is noted that further work may be required by both developers to better integrate the public realm proposals for this site and 55 Bishopsgate, which have been designed independent of one another.

39. Internally, the ground floor of the building is dominated by the public market hall which will provide welcome week-long activation where none exists in the current

building. There are two small office lobbies at ground floor level, with escalators leading up to a mezzanine level which accommodates the reception areas and lift cores.

Fire safety

40. In line with Policy D12 of the London Plan, the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

41. The proposal also meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with London Plan Policies D12 and D5 and all proposed measures should be secured by appropriate conditions.

Heritage

42. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard and attention to preserving listed buildings, including their settings, and to preserving or enhancing the character and appearance of Conservation Areas. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. 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. London Plan Policy HC2 states that development proposals either in World Heritage Sites or their settings should conserve, promote, and enhance their Outstanding Universal Value (OUV). They should not compromise the ability to appreciate their OUV or authenticity and integrity of their attributes.

Heritage impacts

43. GLA officers consider that the following levels of indirect harm are caused by the proposed development. In all cases the assessment is based on the cumulative scenario and the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high, and very high. Table 2 below focuses on World Heritage Sites and Grade I listed assets of particular strategic importance. A significant number of other heritage assets stand to be affected and will be assessed in full by the LPA.

Designated heritage asset	Category of harm identified by GLA	Extent of harm (on scale)
Tower of London World Heritage Site and associated assets	No harm	No harm
Tower Bridge (Grade I)	No harm	No harm
St Paul's Cathedral (Grade I) and associated Conservation Area	Less than substantial	Low
Southwark Cathedral (Grade I)	Less than substantial	Low
Group of assets associated with views from St James's Park including Whitehall Court, Ministry of Defence and Horse Guards (all Grade I)	Less than substantial	Low
The Monument (Grade I)	No harm	No harm

Table 2: Impacts to selected designated heritage assets

Discussion of impacts

44. In many views in the setting of the Tower of London, the proposed development is tucked into the cluster and mostly obscured by existing tall buildings. GLA officers consider there will be no harm to the World Heritage Site.

45. In many views of St Paul's Cathedral (Grade I), the proposed development, despite the design amendments including introducing a chamfered element at a high level, appears closer to the cathedral and taller than it. This is very noticeable, for example, in View 28 (LVMF View 15B.1). This tends to detract from the primacy of the cathedral in the view. Less than substantial harm at a low level is identified.

46. In Views 23, 24 and 25 (LVMF View 26A.1) the proposals appear to the left of the consented 55 Bishopsgate scheme. In these views the irregular crown of the building appears in the context of the roofline of Whitehall Court and the Ministry of Defence (Grade I) resulting in less than substantial harm at a low level.

Conclusions

47. NPPF Paragraph 208 states that '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'. The proposed development is assessed to cause less than substantial harm to heritage assets as identified above, and in all cases is either low or low-to-middle on the range. However, these harms could be outweighed by the public benefits

of the scheme if secured and this will be assessed at Mayor's decision-making stage. Nevertheless, the development remains contrary to London Plan Policy HC1, which requires development proposals to conserve the significance of heritage assets and mitigate harm.

Transport

Public access

48. The proposal will provide multiple pedestrian access points from Bishopsgate to the east and Wormwood Street to the north. It is proposed that pedestrians access the main building via one of two main entrances on Wormwood Street. Through-site connections are proposed to the west and south of the main building. It is expected that access rights for members of the public through these routes shall be secured by planning obligation.

Cycle access and parking

49. Cyclist access to the long-stay cycle parking at the first basement level will primarily be via the stair-with-gulley from Bishopsgate. Secondary access is provided via the two lifts within the cycle hub. An additional access point is proposed via the vehicle ramp from Old Broad Street through the loading bay into the cycle store. It is noted that deliveries would not be permitted within the loading bay from 07:00-10:00, 12:00-14:00, and 16:00-19:00, meaning conflicts between cyclists and vehicles would be minimal. Officers are satisfied that the access points are acceptable.

50. Officers also support that cycle lift and ramp access will be designed to be in line with London Cycle Design Standards, which should be secured by condition or obligation.

51. The quantum of long-stay cycle parking spaces (1,600) falls short of the London Plan requirement for 2,000 spaces. While physical site constraints are acknowledged, the applicant should review the arrangements to make up the shortfall.

52. The proposal includes 144 short-stay cycle parking spaces within the Cycle Hub at Level 1 in line with London Plan standards. The Cycle Hub building is publicly accessible at ground floor level, with a concierge service for visitors' (to the development) cycles on the first and second floors.

Car parking

53. As expected, the proposal would be car free except for the provision of one Blue Badge parking space located at the first basement level, accessed via the vehicle ramp on Old Broad Street. The applicant should clarify how further provision of Blue Badge spaces could be made, should there be an increased demand in future.

Healthy Streets

54. An Active Travel Zone (ATZ) assessment has been undertaken, and nine routes have been reviewed, in line with London Plan Policy T2. The study has identified improvement opportunities on some routes, which include ensuring footways are well-maintained, providing additional seating and minor crossing improvements etc.

55. The Pedestrian Level of Services (PCL) study shows that Wormwood Street (south) adjacent to the site would become highly congested with Level of Service 'F' if no improvement is delivered. It is welcomed that a number of scenarios for improvement have been assessed by the applicant, which see footway improvements that would enable better level of service and accommodate future rise of footfall in the area. The City of London should therefore secure appropriate improvements by planning obligations accordingly.

56. The proposed footway improvements on Bishopsgate should be delivered with the applicant entering a S278 agreement with TfL for the following works:

    Widening of the Bishopsgate eastern footway along the Site frontage.

    Widening of the Bishopsgate western footway in line with the Site frontage

57. In addition, TfL is developing a safety improvement proposal for the A10 Bishopsgate. A contribution of £1.29m is therefore sought from this proposal toward the project.

Legible London

58. The new permeability between Bishopsgate and Wormwood Street will require carefully designed signage. The Council should seek to secure a contribution of £35,000 towards new Legible London wayfinding signage on the public highway.

Cycle hire

59. It is anticipated that the proposed development would generate an increased demand for cycle hire. A contribution of £220,000 towards a new docking station is requested, payable to TfL. If a site is not feasible within the application site, then TfL is open to working with the City Corporation and the applicant to find an alternative location within the vicinity. This should be addressed before the application is determined, so that it can be secured in the S106 agreement.

Trip Generation

60. The proposals would generate a net increase of approx. 2,530 two-way persons trips during the peaks compare with the existing use. It is accepted that the TA considers that most trips related to the retail/ performance and exhibition spaces would be linked trips; therefore, the trip generation impact would not be significant.

Public transport service impact

61. Due to large availability of London Underground, buses, National Rail, and DLR services available within walking distance of site, it is not expected that the proposal would have a significant impact to local public transport services.

Delivery and Servicing

62. In line with London Plan Policy T7, a framework Delivery and Servicing Plan (DSP) has been provided which states that service access would be via the ramp off Old Broad Street, however the width of the ramp will be reduced to only allow one way operation. The applicant should therefore clarify measures to eliminate the risk of service vehicles queueing back onto the public highway and put forward a back-up plan for the loading bays in the basement being out of use due to unforeseeable circumstances. Alternative arrangements should also be provided to facilitate quick delivery of small courier items.

63. The final submission of DSP shall be secured by planning condition/ obligation.

Construction

64. A detailed Construction Logistics Plan (CLP), produced fully in accordance with TfL's CLP guidance, should be secured by pre-commencement condition. It is also advised that TfL will seek compensation against loss of revenue/cost of relocation should the existing Cycle Hire docking station on Wormwood Street be temporarily relocated/ suspended during the construction phase. As noted above, the applicant should work with TfL to identify alternative provision during any temporary relocation of the cycle hire facilities.

Infrastructure Protection

65. The site is near London Underground tunnels/ infrastructure. Planning conditions concerning LU assets/ infrastructure protection should be secured accordingly.

Travel Planning

66. A Framework Cycle Promotion Plan has been submitted which is welcomed. Subject to previous comments regarding cycle parking provision being satisfactorily addressed, the finalised Plan should be secured by s106 planning obligation.

Transport Summary

67. In summary, the proposal would be considered acceptable in strategic transport terms provided all the necessary highway and transport conditions and planning obligations requested here, as well as local Healthy Streets and Vision Zero/ safety improvements, are secured. Further work is needed on the cycle parking quantum considering the comments made, as well as financial contribution toward A10 safety improvements and increasing capacity for local cycle hire docking station.

Environment and sustainable infrastructure

Energy strategy

68. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 should be met on site in the first instance; only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site may a contribution to a carbon offset fund be made. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or a local borough price where one has been set.

69. An Energy Statement has been submitted with the application. This shows that the development as currently proposed would see a cumulative reduction in regulated CO2 emissions of 17% beyond Part L 2021. Of this, 9% would be from passive design /energy efficiency measures alone (Be Lean savings). These savings fall well below the requirements of London Plan Policy SI2, which is for a minimum on-site saving of 35% including 15% Be Lean savings. The energy strategy should be revised to bring an improvement to the on-site savings.

70. Full details have been provided to the Corporation and the applicant in a technical memo that should be responded to in full, however outstanding policy requirements include:

    Be Lean: Further exploration of energy efficiency measures;

    Be Clean: Demonstration that the number of energy centres has been minimised;

    Be Green: Demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed ASHP;

    Be Seen: Compliance with this element of policy, with compliance to be secured in the S106 agreement;

    Energy Infrastructure: It is understood that there are no existing district heating networks in the vicinity of the development that are available to link to. However, there is a proposed heat work that would run adjacent to the site and could allow a future connection. The development must be designed in such a way as to allow for a future connection to the network should it come forward in future;

    Managing heat risk: Further details to demonstrate that the GLA cooling hierarchy has been followed.

Whole life-cycle carbon

71. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions. The applicant has

submitted whole life-cycle carbon assessment. The WLC assessment does not yet fully comply with London Plan Policy SI2. A detailed memo has been provided to the Corporation and the applicant for a response.

72. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website[2].

Circular economy

73. The London Plan requires development proposals to integrate circular economy principles as part of the design process, and referable applications must submit a Circular Economy Statement. The applicant has submitted a Circular Economy Statement, including the GLA CES template and supporting information which is welcomed. Some updates are required to achieve satisfactory compliance with the GLA CES guidance, and a detailed memo has been provided to the Corporation and the applicant for a response.

74. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[3].

Urban greening and biodiversity

75. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.271 according to the GLA methodology which falls slightly beneath the target score of 0.3 for non-residential developments. The applicant should explore additional opportunities to increase the urban greening and the Corporation should secure all greening measures to ensure the target is met.

76. The applicant has set out that there would be a biodiversity net gain of 248.29% which complies with the London Plan requirement to secure a net gain. Measures to secure the biodiversity net gain should be secured by the Corporation.

Air quality

77. The site falls within an Air Quality Management Area. The applicant has provided an air quality assessment which concludes that the scheme would be air quality positive through being car-free, with provision of significant public cycle infrastructure, access to public transport and the proposal to deliver consolidated servicing and deliveries. The day-to-day operation of the building itself will be air quality neutral. Mitigation measures are recommended to be implemented during construction to minimise the risk of dust. These should be secured as part of the

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

future planning permission. Accordingly, the development is compliant with Policy SI1.

Local planning authority's position

78. City of London planning officers are currently assessing the application. In due course the Corporation will formally consider the application at a planning committee meeting.

Legal considerations

79. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the City of London Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

80. There are no financial considerations at this stage.

Conclusion

81. London Plan policies on land use; the provision of flexible and affordable workspace, including cultural space; tall building impacts; transport impacts and mitigation; and climate change and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

Land use principles: The proposed high density office development would support the function of the Central Activities Zone and London's position as a World City. Provision of a standalone pavilion for cultural and creative uses is also strongly supported subject to public access and affordable workspace being secured.

Urban design: The City of London's Eastern Cluster is identified as a suitable location for tall buildings and the proposed building height falls within the relevant maximums for this site. The proposal represents high quality

architecture and urban design. The ground level public realm would benefit from greater integration with adjacent developments.

Heritage: Less than substantial harm at a low level is identified to heritage assets, through harm caused to their setting. The harm is to be weighed against the public benefits of the scheme at the Mayor's decision-making stage.

Transport: The proposal would be considered acceptable subject to all the necessary highway and transport conditions and planning obligations being secured, including £1.29m towards improvements on Bishopsgate. Further work is required on the cycle parking quantum.

Energy and sustainable development: The energy strategy, circular economy statement, and whole life carbon assessment require refinements.

For further information, contact GLA Planning Unit (Development Management Team):
Grace Jack, Principal Strategic Planner (case officer)
email: [redacted]
Connaire OSullivan, Team Leader – Development Management
email: [redacted]
Allison Flight, Deputy Head of Development Management
email: [redacted]
John Finlayson, Head of Development Management
email: [redacted]
Lucinda Turner, Assistant Director of Planning
email: [redacted]

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Westminster City Council

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/06288/OBS

Please reply to: Jennie Humphrey
Tel No: [redacted]
Email:

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

21 October 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.: 24/06288/OBS **Application Date:**

Date Received: 10.09.2024 **Date Amended:** 10.09.2024

Plan Nos: Consultation letter from City of London dated 9 September 2024.

Address: 99 Bishopsgate, City Of London, London, EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Town Planning & Building Control

dcncobsz091230

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.



Transport for London

Our ref: CITY 24/46
Your ref: 24/00836/FULEIA

Transport for London
Borough Planning

5 Endeavour Square
Westfield Avenue,
Stratford, London
E20 1JN
Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

Amy Williams
City of London Corporation

29 October 2024

Dear Amy

99 Bishopsgate, City of London E1W 2BX– TfL's Detailed comments

Thank you for consulting TfL about this referable planning application. It is understood that the proposal includes the Demolition of the existing building and construction of a new 54-storey building (253.5m AOD) to provide commercial office floorspace (Class E) with a public market hall on the ground floor for flexible retail, food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); construction of a standalone 6-storey building (52.5m AOD) for flexible exhibition, performance, learning, community, and/or creative workspace (Class F1, Class (E(g)(i), Sui Generis); and construction of a 2-storey public cycle hub building (Sui Generis).

These comments follow the Mayor's recent consideration of the case at stage 1. TfL is in receipt of the Transport Assessment, dated May 2024, Planning Statement, dated May 2024; and other associated document. These form the basis of the response below.

Site location
The site is located on the corner of Bishopsgate (A10) and Wormwood Street. The City of London is entirely within the Central Activities Zone.

The site has a PTAL of 6b, indicating excellent access and connectivity to public transport. The nearest London Underground stations within walking distance are Liverpool Street (200m), Bank (500m), Moorgate (600m), Monument (600m), Fenchurch Street (800m), Cannon Street (800m) and Tower Gateway (900m). Together these stations are served by the Elizabeth line, Central line, Hammersmith and City line, Circle and Metropolitan line, Northern line, Waterloo & City lines, District line, and the DLR. There are National Rail services from Liverpool Street, Fenchurch Street and Cannon Street station providing connections to the East Anglia and the south-east. There are numerous bus stops on A10 Bishopsgate, East Cheapside, Houndsditch, Old Broad Street, Wormwood Street, Prince's Street and Cornhill providing access to 23 routes.

Cycleway 1 (C1) to the northwest of the site between Sun Street and Wilson Street, is the nearest part of the current strategic cycle network. The nearest

cycle hire docking station is on Wormwood Street, directly in front of the northern frontage of the site.

In addition, there are three TfL Cycle hire docking stations locating within 200m of site which are St Mary's Axe, Houndsditch, and Jewry Street cycle hire docking stations.

Access and parking

Access
The proposal will provide multiple pedestrian access points from Bishopsgate to the east and Wormwood Street to the north. It is proposed that pedestrians access the main building via one of the two main entrances on Wormwood Street. Those accessing the office floors above would then use escalators to travel to lift banks on the first and second floors. Through site connections are proposed to the west and south of the main building.

It is welcomed access routes through the site would be opened, which would improve permeability of the site, the access right to members of public shall be secured by planning obligations.

Cyclists access the long stay cycle parking at the first basement level primarily will be via the stair with gulley from Bishopsgate. Secondary access to the long stay cycle parking is provided via the two lifts within the cycle hub to the south-west of the site. In addition, tertiary access to the cycle store is also proposed via the vehicle ramp from Old Broad Street via the ramp and through the loading bay into the cycle store.

The applicant has confirmed deliveries would not be permitted within the loading bay from 07:00-10:00, 12:00-14:00, and 16:00-19:00, minimizing risk of conflicts between cyclists and vehicles, which is welcomed.

It is also supported that cycle lift and ramp access will be designed to be in line with London Cycle Design Standards, which is welcomed and be in line with London Plan Policy T5 Cycling. All of these should be secured by conditions/ obligation accordingly.

Cycle Parking
It is welcomed that the proposal includes 144 short-stay cycle parking spaces, in line with London Plan (2021) cycle parking standards and London Plan policy T5 Cycling, within the Cycle Hub at Level 1.

This building would be accessed via the publicly accessible ground floors of the Cycle Hub, with a concierge service for parking visitors' cycles on the first and second floors.

However, it is not acceptable that the proposed long-stay cycle parking provision of 1600 long-stay spaces would fall well short of the London Plan requirement of 2000 spaces. While the factor of site constraint is acknowledged, the applicant should make up the shortfall by reviewing the current proposed cycle parking arrangement following London Plan cycle parking standards. Since London Plan cycle parking standards are future proof, the phased approach of provision is not accepted.

TfL requests that All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5 Cycling and London Plan cycle parking standards.

Car Parking
TfL welcomes that the proposal would be 'car free' except for provision of a blue badge parking space located at the first basement level. This space would be accessed via the vehicle ramp on Old Broad Street. The applicant shall clarify how further disabled provision can be made should there be an increased in demand in the future, in line with London Plan policy T6.5 Non-residential disabled persons parking.

Healthy Street & Vision Zero
An Active Travel Zone assessment (ATZ) has been undertaken and nine routes have been reviewed, in line with London Plan policy T2 Healthy Street.

The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc.

The Pedestrian Level of Services (PCL) study shows that Wormwood Street (south) adjacent to the site would become highly congested with Level of service (LOS) F if no improvement is delivered alongside of the proposal as less extent for Bishopsgate (west) of LOS C. TfL welcomes that several scenarios for improvement have been assessed which sees footway improvements would enable better level of service and accommodate future rise of footfall in the area, the City of London should therefore secure appropriate improvements by planning obligations accordingly.

The improvement on Bishopsgate shall however be delivered with the applicant enters a s278 agreement with TfL for the following works:

Widening of the Bishopsgate eastern footway along the Site frontage.

Widening of the Bishopsgate western footway in line with the Site frontage

In addition, TfL is developing a safety improvement proposal for the A10 Bishopsgate. A partial contribution of £1.29m is therefore sought from this proposal toward the project. This is considered reasonable as it is in line with that recently secured at the adjacent development at 55 Bishopsgate.

<u>Legible London</u>
TfL considers that new permeable routes between Bishopsgate and Wormwood Street will require carefully designed signage. A contribution of £35,000 towards new Legible London wayfinding on the public highway is therefore requested, payable to the City Corporation, in addition to any wayfinding, art and lighting requirements within the site.
<u>Trip Generation & Mode Share</u>

In line with London Plan Policy T4 Assessing and mitigating transport impacts, trip generation and mode share assessments have been undertaken in the TA. It is forecasted that the overall proposal is expected to generate a total of 4247 office two-way trips in the AM Peak (08:00-09:00) and 3923 two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 2530 two-way persons trips during the peaks compared with the existing use. This assessment is considered robust and acceptable.

TfL accepts that the TA defines most trips related to the retail/ performance and exhibition spaces as likely to be linked trips; so that their trip generation impact would not be significant.

The TA predicts most trips to/from the development will be by sustainable and active modes. Of those, 14% of trips will be by bike or on foot; 8.5% by bus, and 74% by London Underground (LU), rail, or DLR. The number of expected car and taxi trips is negligible.

Public transport service impact

TfL welcomed that a directional assessment on public transport services impact has been provided. Due to the many of LU, Bus, National Rail, and DLR services within walking distance of site, it is not expected that the proposal would have a significant impact on local public transport services.

London Cycle Hire

It is considered that the proposal would generate additional demand for local cycle hire services; to mitigate this TfL would generally seek a financial contribution toward provision of new cycle hire docking station in the City if feasible location has been identified for provision of new docking station. Failing this, a financial contribution toward enhancing level of service for existing cycle hire docking station may however be sought instead. Further advice would be given after further discussion on this matter with the Corporation of London.

TfL will also seek compensation against the loss of revenue if the construction of the proposal leads to the temporary closure of the Wormwood Street Cycle hire docking station locating at the northern frontage of the application site.

Delivery & Servicing

In line with London Plan Policy T7 Deliveries, servicing and construction, a framework Delivery and Servicing Plan (DSP) has been provided which states that service access would be via the ramp off Old Broad Street, however the width of the ramp will be reduced to only allow one way operation.

It also stated that servicing time would be restricted to outside peak hours to minimise traffic impact.

TfL therefore requires that applicant to clarify measures to eliminate the risk of service vehicles queuing back onto the public highway and a put forward a back-up plan for the loading bays in the basement being out of use due to unforeseeable circumstances. Alternative arrangements should also be provided to facilitate quick delivery of small courier items.

TfL also encourage the use of cycle servicing to minimise vehicle servicing and consolidated servicing should be included as part of the servicing strategy.

The final submission of the DSP should be secured by pre-occupation planning condition/ obligation.

Construction Logistics
A Detailed Construction Logistics Plan (CLP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition in consultation with TfL. Special consideration should be given to ensure safety of vulnerable road users in the surrounding area and construction vehicle movements should be carefully planned and routed to avoid congested area and outside the peak hours.

To minimise highway impact, construction vehicle holding area should be provided outside Central London to minimise un-wanted construction movements.

Infrastructure Protection
The site is near TfL/ LU tunnels/ infrastructure. The applicant would be required to seek Structural Approval from both TfL Roads and London Underground prior to commencement. Planning conditions concerning TfL/ LU assets/infrastructure protection should be secured accordingly.

Travel Planning
A framework Cycle Promotion Plan has been submitted which is welcomed. Considering previous comments regarding cycle parking provision being satisfactorily addressed, the finalized Plan should be secured by s106 planning obligation.

Community Infrastructure Levy
The MCIL2 rate for City of London is £80 per square metre.

Summary
The following matters should be resolved before the application can be considered in line with the transport policies of London Plan.

1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreements (S106/s278s)
2. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ.
3. Review of the proposed service access design and clarify measure to minimise risk of queue back by servicing vehicles and arrangements for express deliveries.
4. Secure the submission and approval of cycle parking details by condition.
5. Secure £1.29m (index linked) financial contribution toward TfL's A10 Bishopsgate Safety/ walking/ cycling improvement project.

6. Secure £35,000 (index linked) financial contribution toward Legible London Way-finding improvement.

7. Secure contribution toward cycle hire improvement (either for new cycle hire docking station or service improvement to existing docking station).
8. Revise the DSP considering comments, and secure approval of both DSP and CLP by conditions, including TfL/ LU infrastructure protection.
9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.

I trust that these comments are of assistance. If you have any further queries, please let me know.

Yours sincerely,

PakLim Wong
Area Planner
[redacted]

Application ref: 2024/3852/P
Contact: Miriam Baptist
Tel: [redacted]
Email: [redacted]
Date: 5 November 2024

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: [redacted]

planning@camden.gov.uk
www.camden.gov.uk/planning

Amy Williams
Environment Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
99 Bishopsgate
London
EC2M 3XD

Proposal:
Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys(plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Drawing Nos: See City of London planning application ref 24/00836/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Informative:

1 Reasons for no objection -

The site is not adjacent to any conservation area, listed building or notable site within the borough of Camden. The proposal is not considered to cause any material harm on design, heritage or transport grounds to the adjacent borough of Camden, neither is any material harm considered to the amenity of Camden residents.

It is advised that London Borough of Camden raises no objections and the application should be determined under The City of London's planning policies.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully



Daniel Pope
Chief Planning Officer

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 14/11/2024
Our Ref DS/SUDS24/0052
Your Ref PT_AW/24/00836/FULEIA
Subject 99 Bishopsgate London EC2M 3XD

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

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

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including green-blue roofs), rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.61l/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 $380m^3$;
(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.

APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 24/00836/FULEIA

Development Management Case Officer: Amy Williams

Site Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Application Received: No memo provided

Request for Comment Received: 6 November 2024 (email from AW)

Response issued: 26 November 2024

Comment:

Date & Initials

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Sustainability Statement, prepared by Atelier Ten
- Sustainable Urban Drainage strategy, prepared by AKT II
- Outdoor Thermal Comfort Assessment, prepared by gia
- Biodiversity Net Gain Assessment, prepared by assystem
- Health Impact Assessment, prepared by Trium

Section 12 of the Sustainability Statement considers climate change resilience and assesses the City of London's six climate risks. A BREEAM Wst05 climate change risk assessment is also included in Appendix B of the Sustainability Statement.

Overheating

- Urban Heat Island (UHI) effect is included in the risk assessment under 'impacts on building contents and business continuity'. UHI will be mitigated by vegetation on terraces and building mass providing shading to public realm which will minimise pedestrian discomfort.
- Building facade optimised to control solar gain, with elements replaceable from building interior to allow for future adaptability such as natural ventilation. Building core is located south which helps to minimise excessive solar gain.
- Facade materials selected for future climate resilience

Flooding

- Surface water discharge will be restricted to 0.61 l/s which provides a 99% betterment on existing 1 in 100 year rate.
- Attenuation provided in the form of blue roofing and attenuation tanks.

APPLICATION COMMENT FORM	
• Combined smart stormwater / rainwater attenuation tank will be installed to reduce potable water consumption • Deep-pile foundations and retention of existing basement helps mitigate against subsidence. **Water stress** • Targeting 60% water demand reduction against BREEAM baseline. • Low flow rate fittings specified. • Water monitoring, shut off and leak detection. • Rainwater harvesting and greywater to be used for non potable uses. • Planting specific includes drought toleration plant species with low irrigation requirements. • Irrigation system will use non-potable water and have demand control based on soil conditions and weather predictions. **Biodiversity** • Green roof and green wall provided on cycle hub, terraces and and winter gardens included in tower. • Existing Ginkgo tree adjacent to site to be retained. • 9 trees installed at ground flood public realm • Urban greening factor will exceed COL target (0.305). • Predicted that the scheme will achieve 0.83 habitat units/ha for BNG. • Planting selection to ensure species diversity and nectar-rich planting to encourage a range of biodiversity. • Bird and insect shelter infrastructure to be investigated. **Pests and Diseases** • Interior design to minimise touch points and prevent the spread of contact-based diseases. • Cleaning protocols to prevent spread of bacteria. • Decentralised ventilation systems makes it possible to isolate individual floors • Elevated ventilation rates • Waste management strategy to be communicated to future tenants • Disease-resistance planting selected to discourage disease carrying fauna with plant maintenance and management strategy to prevent spready of pests and diseases **Food, trade and infrastructure** • Diverse incoming power supply from different substations. • Sizing with 10-15% additional electrical capacity. • Demand management system will allow building to modify energy consumption in real time • Cycle parking and end-of-trip facilities (lockers, showers) • Close to existing transport options **Recommendation:**	
The proposed development **is** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate	**EB**

APPLICATION COMMENT FORM	
Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.	**26/11/24**

Memo

To Assistant Director (Development Ma
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Kate Alexander-Newton
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [redacted]
Email [redacted]

Date 26 November 2024
Our Ref 24/05286/NPLN
Your Ref PT_AW/24/00836/FULEIA

DETAILS: 99 Bishopsgate London EC2M 3XD

An application has been received for: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP

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

1. The roof terraces on hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance.

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.

2. 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.

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.

4. 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.

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

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

6. 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.

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 restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

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

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

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

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

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

10. 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. Emergency plant will be expected to meet this criterion.

    (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.

11. 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.

12. Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):
a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

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

condition are incorporated into the development before the design is too advanced to make changes.

13. Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

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

14. 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.

Regards

Kate Alexander-Newton

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ Mob: [redacted]

From: Daniel Barker <[redacted]
Sent: 18 December 2024 09:42
To: Williams, Amy <[redacted]>
Cc: Sehmi, Amrith <[redacted]; Tab Omar
<[redacted] ; Philip Barber <[redacted]
Subject: RE: Consultation response - 99 Bishopsgate - 24/00836/FULEIA

THIS IS AN EXTERNAL EMAIL

OFFICIAL

Dear Amy,

Thank you for your email. I acknowledge that we received your original email relating to the above application.

I confirm that we have no comments to make on the related environmental statement.

I hope this is helpful.

Kind regards,

Daniel

Daniel Barker
Planning Casework Support Officer
Planning Casework Unit
Ministry of Housing, Communities & Local Government
pcu@communities.gov.uk
gov.uk/mhclg | @mhclg

From: Williams, Amy <[redacted]
Sent: 17 December 2024 18:59
To: PCU <[redacted]
Cc: Sehmi, Amrith <[redacted]>; Daniel Barker
[redacted]>; Tab Omar <[redacted];
Philip Barber <[redacted]
Subject: Consultation response - 99 Bishopsgate - 24/00836/FULEIA
Importance: High

Dear PCU,

The MHCLG were consulted on a planning application for the redevelopment of 99 Bishopsgate in September 2024 under LPA reference 24/00836/FULEIA.

I cannot recall receiving a response –please can you advise on whether the SoS will be providing comment on this application.

I understand the GLA have forwarded their Stage 1 response on to PCU, attached here again for ease.

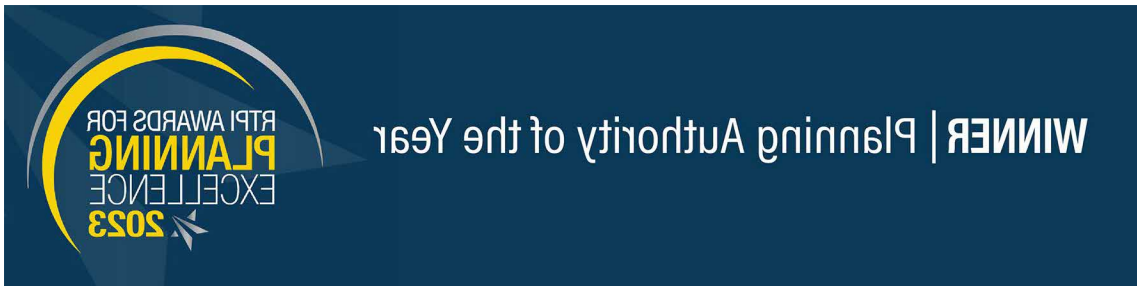
I look forward to hearing from you.

Kind regards,
Amy

Amy Williams | she/her
Senior Planning Officer (Design and Development Management)
Development Division
Environment Department
Tel: [redacted]

Environment Department
City of London Corporation

City of London Corporation| PO Box 270|London EC2P 2EJ|
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Tel: [redacted]

ROYAL borough of GREENWICH

Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
24/2960/K

Directorate of Regeneration, Enterprise & Skills
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

23 December 2024

DECISION NOTICE – RAISE NO OBJECTION

Dear Sir/Madam,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site:	**99 Bishopsgate London EC2M 3XD**
Applicant:	Amy Williams City of London
Proposal:	**Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.** **This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**
Drawings	Consultation Letter.

I refer to your letter dated 09 September 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: Gavin McLaughlin <[redacted]>
Sent: 12 January 2025 18:33
To: Williams, Amy <[redacted]>
Cc: Barnaby Sheppard <[redacted]>; Roy McGowan [redacted] ; Paklim Wong <[redacted]> ; Nushrat Chowdhury <[redacted]>
Subject: Fw: 99 Bishopsgate - TfL Feedback

THIS IS AN EXTERNAL EMAIL

Dear Amy

The attached note is acceptable in principle to TfL and fairly and accurate reflects the outcome of our final strategic transport negotiations with the applicant in this case.

Please include in any Committee summary and bear in mind 2 final related additional points alongside it:

At paragraph 2.7 the wording about the contribution where it says ‘placing the works contract’ to ‘tendering out for the…’.

And we’ll seek specific legal wording during S106 negotiation so that if we can’t extend the docking station outside the site as planned with the £100k due to the emerging London Wall corridor scheme, that funding transfers to the A10, into the other contribution.

Thank you
Gav

Sent from Outlook for iOS

From: Barnaby Hill <[redacted]>
Sent: Wednesday, January 8, 2025 5:53 pm
To: Gavin McLaughlin <[redacted]>
Cc: Roy McGowan [redacted]>
Subject: RE: 99 Bishopsgate - TfL Feedback

Hi Gavin,

Please find our TfL Comment Response note attached for your review. This note reflects the discussion at our meeting on 19th December.

Kind regards,
Barnaby

Barnaby Hill (He/him)
Principal Consultant

momentum
transport consultancy

Clerkenwell House
23-27 Hatton Wall
London
EC1N 8JJ

t [redacted]
m
w **www.momentum-transport.com**

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Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 14/01/2025
Your Ref: 24/00836/FULEIA

Subject: 99 Bishopsgate, London, EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

An ES has been submitted as part of the EIA, with an Air Quality Chapter included. Due to being an EIA and Air Quality Positive Statement has also been submitted as part of the application.

The development has proposed the installation of four backup diesel generators, with the potential of an additional two to be installed at a later date. The four would be for life-safety emergency operation, and the further two would be operated by the future tenant. All generators should be fitted with mitigation, such as SCR, to reduce NO_x emissions to comply with the City of London Air Quality SPD, and only tested in-line with manufacture guidance. Alternatives for backup generators have been assessed, and in the event future generators are installed this process would need to be repeated. If any future generators are utilised for a level of business continuity, they would need to be included in the Air Quality Neutral Assessment.

The development is air quality neutral, as per GLA guidance, with a single blue-badge car parking space and the heating demand provided by heat pump technology. It should be noted that emissions from emergency life-safety backup plant and service and delivery vehicles are exempt from Air Quality Neutral.

The initial Air Quality Positive Statement submitted was generic and did not include any measures, that were not already required through local or London Plan policy, to ensure the development pushed beyond compliance. A revised document was submitted that took service and delivery vehicles into account.

Should the development be approved please attach the following conditions:

Condition M28C amended

Prior to the installation of any generator, full details of the proposed generator, including the testing schedule, shall be submitted for approval. Any diesel generator must be shown to comply with the emission requirements of the City of London Air Quality Supplementary Planning Document. Any generator shall be used solely on emergency occasions and for necessary testing, as per manufacture requirements, and shall not be used at any other time.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2025 and the London Plan Policies SI1 and SD4 D.

Condition M26F

Prior to the installation of any generator in the Pavillion Building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the proposed generators will minimise emissions and exposure to air pollution during operation and will comply with the City of London Air Quality Supplementary Planning Document. The measures detailed in the assessment shall thereafter be maintained in accordance with the approved assessment(s) for the life of the operation of the building.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

Air Quality Neutral Assessment
Prior to the installation of any generator to be used for any purpose outside of emergency life-safety, a revised Air Quality Neutral Assessment that considers the building emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M29

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum

dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2025, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason
To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.
In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

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

Generators and combustion plant
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from

here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

From: Lucy Dale <[redacted]>
Sent: 15 January 2025 13:57
To: Williams, Amy <[redacted]>
Cc: Simon Vince <[redacted]>; GIBBON, Simon R <[redacted]>
Subject: Re: Follow up consultation - 99 Bishopsgate - London City Airport Consultation response

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THIS IS AN EXTERNAL EMAIL

Good afternoon,

We have looked into this further and have the following comments to make regarding the wording of the IFP Condition.

We accept the first statement of "no construction works above 155m AOD shall be carried out until an IFP assessment has been completed"

However, we cannot accept the second statement as it only refers to the construction of this building and not the building itself. We acknowledge the points raised in your email regarding the building and the surrounding environment. However, we have consulted an approved procedure design organisation (NATS) on this matter and they have confirmed that with the proposed height of the building at 253.5m AOD, there would be an impact to the Air Traffic Control Surveillance Minimum Altitude Chart (ATCSMAC).

Therefore, this building needs a full IFP assessment completing before the building can exceed 155m AOD.

Therefore, we propose the condition wording to read as follows:

Instrument Flight Procedures (IFPs) Impact Condition

No construction works above 155 m AOD shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. The IFP assessment must consider the proposed building and any subsequent cranes used for construction.

Reason: *To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.*

Please let me know if you have any further comments.

Kind regards,

Lucy Dale
External consultant with access to Safeguarding mailbox (WO0000020670382)

[redacted]

www.londoncityairport.com

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From: Williams, Amy <[redacted]>
Sent: 09 January 2025 1:02 PM
To: Lucy Dale <[redacted]>
Subject: Follow up consultation - 99 Bishopsgate - London City Airport Consultation response

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Lucy,

I hope all is well and Happy New Year.

Apologies for the delay in sending the below to you – I am just getting around to drafting conditions for this scheme.

Please see the agents request below regarding LCY's proposed conditions on 99 Bishopsgate, ref. 24/00836/FULEIA.

Please can you let me know if these amendments would be acceptable to LCY?

I am happy to chat if need be.

Kind regards,

Amy

Amy Williams | she/her
Senior Planning Officer (Design and Development Management)
Development Division
Environment Department
Tel: [redacted]

Environment Department
City of London Corporation

City of London Corporation| PO Box 270|London EC2P 2EJ|
www.cityoflondon.gov.uk



From: Simon Gunasekara <[redacted]>
Sent: 27 September 2024 15:36
To: Williams, Amy <[redacted]>
Cc: Sehmi, Amrith <[redacted]>; richard.ward <[redacted]>
Subject: 99BG - London City Airport Consultation response

THIS IS AN EXTERNAL EMAIL

Hi Amy,

We have received the NATS and LCY consultation responses, and I have also had these reviewed by our aviation consultant who has advised the following and has proposed the below suggested wording change to one of the LCY proposed conditions.

We kindly request that the condition we reworded as suggested below:

Instrument Flight Procedures (IFPs) Impact Condition *No construction works above ~~ground level~~ 155 m AOD shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment of proposed construction craneage above this height has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. ~~The IFP assessment must consider all tall buildings and proposed construction~~*

~~cranage.~~ *Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.*

This amendment is suggested as we do not consider that an IFP check of the building is justified at this location given the building is adjacent to an existing tall building cluster and is significantly lower than 22 BG and the consented scheme at 55 BG. I attach the conditions for 55BG for comparison. It is noted that since the 55BG conditions were imposed, there has been more emphasis on the need for IFP checks by APDO (NATS), however, it is considered unreasonable to ask for these checks when the obstacles clearly don't infringe the OLS (in this case the approach surface) and are effectively shielded by other tall building development in the vicinity. Furthermore, it is a well-established constraint of 309.6 m AOD for cranes in this area when LCY is operational.

Could you kindly raise the above with LCY?

Kind regards,

Simon
Simon Gunasekara
Associate
direct: [redacted]
mobile: [redacted]
e-mail: [redacted]
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: [redacted] website: www.dp9.co.uk

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Website: http://www.cityoflondon.gov.uk

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From: [redacted]
To:
Subject: 99 Bishopsgate EC2M 3XD
Date: 23 September 2024 14:59:21

THIS IS AN EXTERNAL EMAIL

I object to to this application.
The area is also too densely developed with high rise office buildings.

This is having a deleterious effect on overloaded utilities. We have already suffered from the effects of power cuts.
Further development will increase the disruption of traffic and cause further noise and pollution.

If the development is permitted please ensure that the hours of work are strictly adhered too particularly with regard to noise during the night.

Kind regards

Peter Rose
[redacted]
London EC3V 9DS

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Ms Josephine Knowles
Address: [redacted] Southampton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This development is an existential threat to the charity of St Ethelburgas it will challenge its very existence due to teh disruption. This charities activities, (trainings, public talks, consultancy, faith and cultural events) will be impossible as these require a quiet and peaceful environment.
This place is unique in what it stands for and for being an oasis in the city. Having been a recent user for an event, this is a rare gem which will be profoundly affected by this development. Please reconsider your plans.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Mr marco sidoli
Address: [redacted] LONDON LONDON

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:THIS WILL CAUSE UNTOLD DISTURBANCE TO AN ALREADY TOUGH FINANCIAL CLIMATE THAT WE ARE SUFFERING.
THE CLOSURE OF PART OF BISHOPSGATE, THE DUST, NOISE, TRAFFIC CONGESTION, LOSS OF PARKING, THE LIST IS ENDLESS.

THERE IS NO CONSIDERATION FOR BUSINESSES OR RESIDENTIAL PROPERTIES AT ALL. ANY DISRUPTION TO BUSINESS MUST BE COMPENSATED AS WE CANNOT FINANCIALLY CONTINUE LIKE THIS.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
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Case Officer: Amy Williams

Customer Details

Name: Mr Richard Doffman
Address: [redacted] London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:In reference to the proposed extensive re-development by Brookfield Properties of 99 Bishopsgate London EC2M 3XD

I represent, Pixielink Limited who are the owners of the building located at [redacted] Wormwood Street London EC2M 1RP

Notwithstanding that we are informed that the construction of the building is in line with the City of London's Local Plan 2040 our building will be dwarfed by the size and magnitude of the proposed scheme.

The building at [redacted] Wormwood Street will be greatly effected by loss of light once the development has been built leaving us with minimal daylight. We therefore wish to formally to object to the

current Planning Application submitted 6/08/2024 and validated by City Corporation on 9/09/2024

From: [redacted]
To:
Cc:
Subject: 99 Bishopsgate London EC2M 3XD Ref. No: 24/00836/FULEIA
Date: 04 October 2024 10:30:05

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THIS IS AN EXTERNAL EMAIL

Dear Sirs

I write to you in reference to the proposed extensive re-development by Brookfield Properties of 99 Bishopsgate London EC2M 3XD

I represent, Pixielink Limited who are the owners of the building located at [redacted] Wormwood Street London EC2M 1RP

Notwithstanding that we are informed that the construction of the building is in line with the City of London's Local Plan 2040 our building will be dwarfed by the size and magnitude of the proposed scheme.

The building at [redacted] Wormwood Street will be greatly effected by loss of light once the development has been built leaving us with minimal daylight. We therefore wish to formally to object to the current Planning Application submitted 6/08/2024 and validated by City Corporation on 9/09/2024

Richard

Richard Doffman
[redacted]
http://www.pearl-coutts.co.uk

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From: Elsie Roderiques
To: PLN - Comments
Subject: 24/00836/FULEIA - Objection
Date: 04 October 2024 11:48:25

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THIS IS AN EXTERNAL EMAIL

I am objecting vehemently to the planning application 24/00836/FULEIA.

This development represents an existential threat to the building and charity St Ethelburga's Centre for Peace and Justice which is directly opposite.

The charity does such important work for thousands of people, locally, nationally and internationally. It represents an oasis in the city and it must be protected and helped to flourish.

The disturbance, noise, dust and vibrations for the first 2 years of demolition and basement works, and then a further 3 or 4 years of building, will make the continuation of the charity's activities, trainings, public talks, consultancy, faith and cultural events, for which they receive grant funding, impossible. Without exception these require a quiet and peaceful environment - and also depend on their reputation and iconic value of an oasis of calm in the city. I myself have just booked an event there in November on this basis and require the use of the gardens and a quiet, peaceful space and would have not done so with building works going on.

Furthermore the noise disturbance will render the venue hire business unworkable, thus destroying the charity's means to support itself and pay the staff, building and running costs.

Once built the development will cut their natural light still further, potentially threatening the Peace Garden. It may also increase the wind tunnel effect (they have already experienced wind damage to the fabric of the building as a result of the development next door), as well as unpleasantly high wind in the garden.

Please reject this application. London really doesn't need another skyscraper.

Many thanks,

Elsie Roderiques
[redacted]
Wolverton
MK12 5DJ

--
Elsie Roderiques (née Bryant)
[redacted]
She/her

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Dr Shereen Nizari
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This development has the potential to be highly disruptive to the activities of St Ethelburga's charity and its Grade 1 listed building. The loss of natural light would be detrimental to the peace garden, the wind tunnels created would make it unpleasant to use. The noise and vibrations from the development would be problematic for the programs run by St Ethelburga's Centre for Peace and Reconciliation.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Dr Shereen Nizari
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
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Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Aminmohamed Juma
Address: [redacted] Harrow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I believe that the level of disruption, disturbance, noise, dust, and vibrations involved in extensive demolition and construction, which will be ongoing for a minimum of 5-6 years, will render St. Ethelbergas space disruptive and unusable. Their work on peace and reconciliation so much depends on the quiet and peaceful nature of their space. Many of their projects will be disrupted or severely limited.
The development of 100m taller and storeys 5-53 will be very clos to St Ethelburga's. This will reduce their natural light and likely create strong and unpleasant winds around their centre and will also adversely affect their Peace Garden.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Lord Rowan WILLIAMS
Address: [redacted] Cardiff

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:I write as a patron of the St Ethelburga's Centre to express dismay at the level of disruption and loss of amenity involved in the proposals for development at 99 Bishopsgate. Loss of natural light, building works over some 5/6 years, general adverse effect on the quiet and seclusion of the Centre, all combine to make this a wholly undesirable move. The crucial work of the Centre for reflection, conferences and meditation (especially its unique garden) will suffer severely.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Ms Ruwani Gunawardene
Address: [redacted] Wembley

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I have been a volunteer at St Ethelburga's Centre for Reconciliation and Peace since 2008 when dialogue commenced for the war situation in Sri Lanka. The space that ST E's provided for our communities to meet and come to a resolution of living peacefully as diaspora communities was beyond valuable. Ours was just one community. I am aware of so many other important community reconciliatory work being held in this space.

It is a historic and an incredibly precious site which holds communities in Britain and from around the world to meet and work together for the common good.

With so many serious conflict happening around the world, not least the war in Ukraine and the Middle East and ecologically driven conflict, the work that St Ethelburga's do is going to be

increasingly important and vital for maintaining some degree of peace.

One way in which the Centre manages to keep going as a viable entity is by letting the space for events and functions. If yet another building project comes along and causes noise pollution (I have been there on many occasions during other building projects) the centre's work is bound to be disrupted and loss of income will be inevitable. For a charity such as St Ethelburga's this is not good news at all. I am writing therefore, to ask you please to grant due compensation for the long period of 6 years that the building work is going to take place so the work of St Ethelburga's will not need to cease or even be closed down. This will be such a phenomenal disaster in the current climate of things in the world.

I invite you to visit the place and see the work for yourself. It is unique and cutting edge and a very, very necessary part of civil society in this great city of London which is a centre for the whole world. Therefore your consideration of paying compensation for the loss of income for the centre will be much appreciated.

Revd. Ruwani Gunawardene

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Sarah Young
Address: [redacted] London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I'd like to express my concern regarding the redevelopment of 99 Bishopsgate and its impact on St. Ethelburga's Centre for Reconciliation and Peace.
As we're both part of the same industry, we had the opportunity to work with St. Ethelburga's Centre for many years with great success and many positive comments from clients who held their events there. Some of them underlined the great ambience of the venue and it's uniqueness.
We're afraid that the changes in the close proximity of the venue and the noise caused by the ongoing works will affect St. Ethelburga's severely & possibly impact the interest in event hosting due to the conditions in place. As a charity, the Centre relies on income generated from venue hire to support their charitable events and activities which are invaluable for the community and the area.
If the factors related to the redevelopment (such as noise, dust, vibrations, limited access, loud

work during operating hours) were to impact the number of events the Centre is able to host, it would be a huge loss in terms of the positive impact this place brings to us.
Please take a closer look at the impact of the redevelopment (especially in terms of noise, vibrations, access), and consider amending the plans.

Comments for Planning Application 24/00836/FULEIA

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Mrs DurgaMata Chaudhuri
Address: [redacted] Barnes London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:St Ethelburga's Centre for Reconciliation and Peace is a unique and vitally important facility in the city of London.

The proposed building would make it impossible for this charity to function effectively, as it needs a calm and peaceful environment.
At this time, with conflict killing hundreds of people every day, the need for the mediation and peace-building work provided by St Ethelburga's is needed more than ever.
I have attended many events at St Ethelburga's, including inter-faith and inter-cultural workshops which promote deeper empathy and understanding improving community cohesion and reducing the fear and prejudice which contribute to, for example, hate-riots which we saw so pertinently in summer.

I have also been to cultural events such as concerts and discussions, all of which require a quiet environment and would be seriously disrupted by the noise of building work which I understand would continue for years.

All the massive high-rise buildings springing up in London are damaging the nature and quality of our city. A building of the nature proposed here, would not only harm the whole local environment but also reduce the light and cause unpredictable winds which would affect the quality of the Peace Garden and affect the whole character, environment and 'spiritual consciousness' of St Ethelburga's - which is so desperately needed - especially at this time.

To conclude I would like to oppose in the strongest possible way, this development which would I presume, just make some wealthy people even richer - at the expense of the functioning of a unique and absolutely priceless, desperately needed resource in this city, which serves not only the entire nation but the whole world.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms amina hirani
Address: [redacted] kingsbury London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I am objecting vehemently to the planning application 24/00836/FULEIA.
This development represents threatens the listed building - St Ethelburga's Centre for Peace and Justice which is directly opposite - which is a heaven in a very busy area for so many who use the centre for promoting wellbeing of the world.
The work of this charity is recognised locally, nationally and internationally and should continue to support good causes.

Notwithstanding the upheaval during construction at various levels which will be a nightmare and will reduce the importance of the work of the charity as less and less people will access it,

once built the development will cut their natural light it the garden which is an oasis for so many. it will also impact on the micro climate of the garden and will attract les and less wild life which is already rear in the surrounding built up area.

Please reject this application. London really doesn't need another skyscraper

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Wendy-May Jacobs
Address: [redacted] Portsmouth

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am deeply dismayed at the prospect of this proposal being given the go-ahead. St Ethelburga's is a precious place of restoration and hospitality and peace-education for thousands of people every year, of all faiths and none, from all backgrounds, all shapes and sizes. The ripple effect of the work of this centre of reconciliation is felt all over the world. The proposed building work would mean years of noise and disruption which would have a deeply detrimental effect on the activities of St Ethelburga's, and my understanding is that the light available to the Centre would be drastically diminished. Please reconsider this harmful proposal.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr Michael Cawley
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am writing to express my deep concern and heartfelt objection to the planning application 24/00836/FULEIA.

I feel compelled to highlight the significant and damaging consequences this project would have on such an invaluable community asset. I have had the privilege of attending events at St Ethelburga's Centre for Reconciliation and Peace, experiences that have been profoundly transformative and enlightening.

St Ethelburga's is more than just a building; it is a sanctuary where people from all walks of life can come together in peace and harmony. The centre's inclusive work is a beacon of hope, providing a safe haven for those seeking solace amidst the chaos of the city. This little oasis of

calm is so special to many of us, offering an environment where interfaith dialogue, conflict resolution, and peacebuilding can thrive. It is truly irreplaceable.

The extensive demolition and construction work proposed for 99 Bishopsgate will cause severe disruptions lasting at least five years. The noise, dust, vibrations, and reduced natural light due to the new building's height and proximity will render St Ethelburga's unusable for extended periods, significantly impairing their ability to operate. At a time when our world needs more peace and unity, this development threatens to silence one of London's most vital voices.

So much will be lost if this development goes ahead: the tranquil space that supports so many in need, the crucial work they do in fostering understanding and reconciliation, and the unique cultural heritage of a Grade I listed building. In contrast, what will be gained from this development? So little, compared to the invaluable sanctuary that St Ethelburga's provides.

I strongly urge you to reconsider this application and protect the irreplaceable space that St Ethelburga's Centre for Reconciliation and Peace offers to our city. It is a treasure that we cannot afford to lose.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mrs Susan Bolen
Address: [redacted] Augustus Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I am writing to express my strong opposition to the proposed demolition and reconstruction at 99 Bishopsgate, London, EC2M 3XD.

While the site itself may not hold significant historical value, its proximity to St. Ethelburga's Centre is deeply concerning. As someone who frequently visits and has strong ties with St. Ethelburga's Centre for Peace and Reconciliation, I believe the proposed development could harm the character and integrity of this important institution. Located just 20 metres from the site, the Centre plays a vital role in interfaith relations, mediation, reconciliation, and community engagement. It draws people from across the UK and internationally, offering critical services in our current social climate. The impact on the Centre's users and its peaceful environment is a serious concern for

myself and many others.

The demolition could also lead to increased traffic, noise, and disruptions, negatively affecting both local residents and visitors to the Centre. It is essential that any development in the area supports, rather than detracts from, the community's key landmarks and institutions.

I strongly urge you to reconsider this proposal and work with local residents and stakeholders to explore alternatives that respect the significance of St. Ethelburga's Centre while addressing modern needs.

Thank you for considering my concerns.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Giedre Kleivaite
Address: [redacted] Canning Town London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Dear Sirs,

I had recently attended a Spiritual Ecology Workshop Carousel at St Ethelburga's and felt really inspired by their heartfelt offerings and gathering. Their serene courtyard feels like such an oasis in busy central London and is important to protect! The work they deliver to build peace across divides is crucially important, especially amidst current world events and therefore extensive disruption and noise will have an adverse impact on their efforts.

I wish to object the proposed developments (Application number: 24/00836/FULEIA) based on the following:

- The disruptions caused by the development will severely impair the ability of the charity to operate, resulting in them not being able to offer crucial peacebuilding, conflict resolution, and interfaith dialogue events.
- Once completed, the development will obstruct the Centre's light, will increase damaging and unpleasant winds which will detrimentally impact the ambiance of the space and the quality of events offered at St Ethelburga's.

This great charity and their Grade 1 Listed building are under threat. Please reconsider this planning application.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr Michael Gibbs
Address: [redacted] Belfast

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Dear Sir/Madam,

I am writing to formally object to the proposed development of 99 Bishopsgate.

St Ethelburga's is a vital institution, both culturally and spiritually, and plays an irreplaceable role in fostering peace, reconciliation, and interfaith dialogue. These functions are made possible by the unique, quiet, and serene environment that the Centre has cultivated over the years. However, the proposed development directly threatens the viability of this environment. The level of disruption anticipated from five to six years of demolition and construction-including noise, dust, vibrations, and general disturbance-would severely impair the Centre's ability to operate effectively during this period. Many of the events, workshops, and peacebuilding initiatives that the Centre runs could be

disrupted or even rendered impossible under such conditions.

Furthermore, the scale of the proposed development-specifically the significant increase in building height and the closer proximity of the upper storeys-poses additional long-term threats to the Centre. The reduction in natural light, coupled with increased wind turbulence, would drastically affect the ambiance of St Ethelburga's Peace Garden and the Centre's ability to offer a peaceful and welcoming space for reflection, dialogue, and reconciliation. This would not only harm the physical space but also diminish the quality of what St Ethelburga's can offer to the community.

The Centre provides a sacred space for peacebuilding, and it is vital that this is protected. The proposed development risks undermining not just the physical presence of the Centre, but also the profound impact it has on promoting peace and reconciliation in a time of global turmoil.

We respectfully urge you to consider the long-term implications of this development on such a critical institution and ask that you reject the current planning application.

Sincerely,
Michael Gibbs

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Noeline Sanders
Address: [redacted] Hatton Hill Windlesham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I strongly object to the building of this new development and associated impact it will have on St Ethelburga's, which is one of the few remaining historical buildings that has provided a vital role to society over centuries. In the current context it was re-built after the IRA Bishopsgate bombings as a Centre for Reconciliation and Peace, providing a vital service/programmes of training for Community based conflict transformation, developing young leaders in reconciliation and peacemaking and interfaith dialogue events.

I was a trustee of the Centre from 2011 -2020. I know first hand of the work that has been successfully developed by the team and painstakingly implemented by the team over the years in

terms of impact and reaching a sustainable funding model.

I met with the team last week on St Ethelburga's feast day and heard first hand of the very real potential impact of the disruption on the Centre - namely, the 6 year new building works opposite could have on the ongoing viability of the Centre, as a result of a huge reduction to programmes and also the important funding source of the venue hire business.
Furthermore, once completed, it will obstruct the Centre's light, will increase damaging and unpleasant winds, and will detrimentally impact the ambiance of the space, the Peace Garden and the quality of what St Ethelburga offers

Right now, with so many conflicts happening around the world, not to mention the impact of ecologically driven conflict already developing, the work and programmes of St Eths is a beacon of practical action for peace building and resilience training.

As the very least, the developers need to most urgently compensate the St Ethelburgas centre for the loss of earnings and disruption to its programmes - financial compensation to be offered for the 6 year period of disruption envisaged, to mitigate against the loss of income in order to remain a 'going concern' and not to shut down.

I urge you to consider this with due care.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr Sir Tony Baldry
Address: [redacted] Bloxham

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Application number 24/00836/FULEIA

I am writing in my capacity as Parish Clerk of St. Ethelburga's Bishopsgate.

As a previous Chair of the Trustees of the St. Ethelburga's Centre for Peace and Reconciliation and as a previous Chair of the Church Buildings Council, a statutory body that has responsibility for the care and maintenance of all 16,000 parish churches in England, including all of the Church of England's church buildings within the City of London.

The Corporation will be familiar with the history of St. Ethelburga's, a church building that goes back to Saxon times, one of the very few church buildings within the City that survived both the

Great Fire and the Blitz, but which tragically became collateral damage to an IRA lorry bomb attack on the City of London in the early 1990s.

Due to the leadership of the then Bishop of London and Cardinal Archbishop of Westminster, and the encouragement of our present King, St. Ethelburga's was rebuilt and restored as near as possible to its original design and became a Centre for Peace and Reconciliation.

St. Ethelburga's is still a consecrated church building, subject to faculty jurisdiction but today its main purpose is as a Centre for Peace and Reconciliation.

To fund its core activities, St. Ethelburga's lets out its space - the Nave, the garden and the Peace Tent at the rear of the church - for others to hire those spaces.

As you can imagine, these include events from conferences or meetings during the day to corporate dinners in the evening.

The income from these lettings is crucial to the sustainability and survival of St. Ethelburga's.

Also, much of the work of St. Ethelburga's is dependent upon St. Ethelburga's being as far as is possible an oasis of quiet in the hubbub of the City.

Not surprisingly, as against this background, the planning application for the extensive redevelopment of 99 Bishopsgate, less than 20 metres from St. Ethelburga's, a Grade One Listed building, is met with very serious concern as the prospect of several years demolition work followed by several years of construction work is likely to seriously threaten the viability and existence of St. Ethelburga's, one of the oldest churches in the City of London.

The disruption caused by the development will severely impair the ability of St. Ethelburga's to operate, resulting in St. Ethelburga's not being able to offer peace building, conflict resolution and interfaith dialogue at a time when such activities are perhaps most acutely needed in the world. If the development takes place, once completed it will seriously obstruct St. Ethelburga's light and increase new wind tunnels which will both damage the centre and the amenity of St. Ethelburga's, including the garden behind the church, which is a small oasis of calm in this part of the City of London.

The City of London has no shortage of skyscrapers but within the townscape there are a finite number of historic buildings, such as St. Ethelburga's, that help define the City's history and continuity. In addition, St. Ethelburga's seeks to assist the building of a cosmopolitan city where all feel welcomed and valued.

The sheer scale, size and duration of the proposed building works relating to the proposed rebuilding of 99 Bishopsgate are a very real threat to the existence and survival of St. Ethelburga's

as a church building and as an organisation serving the people of London.

It is much to be hoped that the Planning Committee in considering this application will not be insensitive to these very real concerns.

Rt. Hon. Sir Tony Baldry
Parish Clerk
St. Ethelburga's, Bishopsgate

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr Anthony Bennett
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I have been over the course of the last twenty years been a frequent visitor to St Ethelburga's and a user of its services. I can therefore testify to the immense transformative effect this historic building and centre has had on its environs and community, and the threat posed by this development.

My objections are: Firstly) the extended nature of the construction work (up to six years) will necessarily have a destructive impact on the delicacy of the meditative nature of the space. For at least 700 years, this has been a "quiet space", allowing respite and reflection. The noise, shadow, physical obstruction and smoke generated by the build cannot help but destroy this calm. Secondly) Post build, the new build will have a heavily domineering presence on the activity of the space, blocking sunlight and casting much of the delicate work into darkness. Moreover, the garden space will be caught in a heightened wind tunnel, obstruct its light, increase damaging and

unpleasant winds, detrimentally impact the ambiance of the Garden and the quality of what St Ethelburga offers.

Lastly, beyond the practical and aesthetic, there is a significant cultural, historical, and spiritual importance of St Ethelburga's to the history of the City of London. When the building was first destroyed in the 1990s by bombing, there was an enlightened decision taken to reinstate the building to maintain what little was left of the medieval built environment. Given the in the new Museum of London, and the huge escalation of new skyscraper builds since the 1990s, it would seem to me that the we can ill afford to denigrate further any of the outstanding historic fabric, and that this new development will reverse the commitment to retain as much of the original character of the City of London as possible. Post pandemic, the City needs to diversify toward more leisure, touristic, leisure and heritage usage. The retention and respect of St Ethelburga cannot help but be a core part of this.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Mrs Laura Janner-Klausner
Address: [redacted] London London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:As a senior Jewish Communal leader I'd like to voice my opposition to this development, the scale of which will unquestionably disrupt the work and essential viability of St Ethelberga's Centre for Peace and Reconciliation.

The Centre conducts vital work in addressing some of the toughest conflicts in our world. It's work is vital to maintaining dialogue within UK communities that are impacted by such conflicts and in so doing, the Centre makes a vital contribution to community cohesion in the UK.

The commercial benefits that may come from the proposed development need to be weighed against their impact on the Centre. The six year demolition and construction period will disrupt St Ethelburga's essential work, and endanger its crucial revenue from hosting events. It will also undermine the Centre's unique character as an oasis of calm in the City.

At the very least the Corporation should stipulate unequivocally that the developers compensate St Ethelburga's for the consequences of the disruption as a condition of Planning Permission, thus ensuring that the critical work of the Centre can continue and that should the proposed development go ahead and be completed, it will still have a thriving St Ethelburga as its close neighbour.

St Ethelburga's
Centre for Reconciliation and Peace

We are making an objection to the full application (ref. 24/00836/FULEIA) for a 53 storey (plus plant) high rise development at 99 Bishopsgate (hereafter referred to as 99 Bishopsgate and the "Development") directly opposite our centre, St Ethelburga's Centre for Reconciliation and Peace, at 78 Bishopsgate (hereafter referred to as "St Ethelburga's").

Summary

The proposed development, if allowed, will result in a range of significant negative impacts on St Ethelburga's, principally:

- An adverse impact on both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- Prevention of the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive this, a continued and long-term impact through impacts on the local microclimate and other environmental effects.

For the reasons set out in this objection, it is our view that the proposed development conflicts with policies of the development plan, and that these conflicts attract such significant weight as to outweigh any public benefits in favour of the scheme. We therefore urge the City of London Corporation, and the Mayor of London, to reject the planning application.

Without prejudice to this position, in the event that planning permission is resolved to be granted, we require the following safeguards to be imposed so as to minimise the impacts on St Ethelburga's:

- Direct support in offsetting the financial impact that the construction will have on St Ethelburga's.
- Investment in St Ethelburga's in recognition of its status as a unique and valuable cornerstone of local culture and heritage.
- Specialist consideration and surveying of the impact of wind and vibrations on our fragile and historic Grade 1 listed building.
- Specialist monitoring of vibrations and movement within our Grade 1 listed building. Likewise, specialist repair if required.
- Limitations on site working hours and noisy works so as to lessen the severity of disruption to St Ethelburga's; this would include especially strict limitations on site working hours and noisy works so as to avoid disruption to St Ethelburga's higher-value evening events (18.00 - 21.00) and Saturday events (10.00 - 16.00).
- Financial contributions to triple glazing to lessen the noise pollution caused by building works and protect St Ethelburga's historic windows.

- Regular cleaning of the windows and specialist cleaning of the stone facade, which will be affected by the dust from demolition and construction. Potentially redecoration of the bell tower if particularly affected.

About St Ethelburga's place in the City

St Ethelburga's, named after the first leader of a monastic order for women in England, was first recorded in 1250. It is a Grade 1 Listed Building which was one of only 8 City churches to survive the Great Fire of 1666. It also survived the Blitz and a major IRA bombing in 1993. It was proposed that St Ethelburga's be demolished after the bombing, but the public and influential figures in the City recognised the importance of the church and its role in the community and opposed demolition. St Ethelburga's was restored as a Centre for Reconciliation and Peace and the building was formally reopened by the then Prince, now King, Charles in 2002.

Since 2002, St Ethelburga's has been dedicated to reconciliation and peace. We run various programs focused on community reconciliation, peacebuilding, interfaith dialogue, refugee inclusion, spiritual ecology, and navigating climate and ecological crises. The foundation of all of our work is the symbolism and historic importance of St Ethelburga's as a place of peace and sanctuary. It has had a tangible impact on the lives of many of those with whom we have worked. It stands on ground that has been consecrated for at least 800 years. Our work relies on the peaceful, quiet, and secluded ambiance of our building.

The building and grounds

The following are the key elements that make up St Ethelburga's:

The Nave

The proposed development will be situated directly opposite the Nave of St Ethelburga's, which is located behind the historic facade and bell tower. The Nave is at the heart of the building and our work. It is here that we regularly run trainings, talks, workshops, and music events. We also offer this as an affordable venue for hire. It is an important space for dialogue, peace and reconciliation, and community building. For instance, in the wake of October 7th and subsequent events, the Nave was used by the Lord Mayor of London to bring together senior Jewish, Muslim, and Christian leaders.

The Peace Garden

The Peace Garden is a rare space of tranquillity in the heart of the City. It is open to the public and is a notable stop on city walking tours. The garden is ecologically diverse, containing ferns, roses, olive trees, and vines among other plants, and has won 'Flowers in the City' awards from The Worshipful Company of Gardeners. Its central fountain retains its original column and we believe it is the only working historic fountain in the City.

As well as benches and seating, the garden also contains a number of attractions for visitors who come to and enjoy the garden, including:

- A statue by Naomi Blake, who is known for her work reflecting her Holocaust experiences and for her vision of uniting faiths, building understanding between religions and her hope for the future;
- A plaque celebrating the reconciliation between the British and Japanese soldiers who fought each other in Burma;
- A memorial plaque to Edward Henty, who was killed in the 1993 bombing; and
- A Peace Pole, which is an internationally-recognized symbol of humanity's desire for peace and connects us with many other important locations across the globe.

People come and use the garden for many reasons: it provides the public and our community with a place to gather and meet, to take some time away from the surrounding busyness, to connect with nature and our wider humanity, and for contemplation and reflection in hard times.

The Bedouin Tent

The Bedouin Tent is situated in the courtyard of St Ethelburga's. It is woven with goat's hair and fitted with stained glass windows, hand carved doors, intricate metal work, and mosaic tiling. The Tent was conceived and constructed as a response to 9/11: it is a meeting of East and West and a place for non-hierarchical dialogue, where all perspectives are welcomed equally. The Eastern-style design contrasts the Western ecclesiastical architecture and highlights the need to build community across differences. This is reflected in the architecture of the tent, designed by Professor Keith Critchlow around the principles of sacred geometry. Its design carries a hint of the architecture of Al-Andalus, southern Spain, during the mediaeval period when Jews, Christians, and Muslims lived alongside each other, sharing the space and enriching each other's cultures. Each window in the Tent contains the word 'peace' in a different language, as well as the sun and the moon, symbolising reconciliation. The window designs also incorporate trees and seeds, illustrating the reconciliation needed between humanity and the Earth.

The Tent is an acutely important space which is used for many important events around peacebuilding and community building; it has often been used as a space to bring together senior Christian, Jewish, and Muslim leaders. Like the garden, the Tent, when not in use, is open to the public as a space of peace, contemplation and reflection.

Venue hire

We have a venue hire business which has been growing at a fast rate. We have been hiring out our venue at an affordable rate for weddings, parties, exhibitions, conferences, concerts, gatherings, and book launches. The income generated from this supports the grants and funding that we receive and goes into the running of our projects and the maintenance of our building. St Ethelburga's has been a significant and growing site of culture within Bishopsgate.

Projects

Since John Medows Rodwell, who was rector to St Ethelburga's between 1843 to 1900 and published one of the very earliest reliable translations of the Qur'an into English in 1861, first

envisioned our space as a place where all faiths are welcomed, St Ethelburga's has been known as a beacon of peaceful and constructive interfaith exchange within the heart of London and is a space in which Christian, Muslim, Buddhist, and Sikh prayers are regularly held. The proposed development threatens this vital work, which is even more valuable in our current political and geopolitical climate.

St Ethelburga's also acts as an educational centre. We regularly welcome school and university groups to supplement the curriculum and run educational programs and workshops on various themes, including the importance of peace and reconciliation, the role of interfaith encounter and religious diversity within our society, and how to navigate and respond to climate and ecological breakdown. We equip young people to be leaders and community builders, peacemakers, and reconcilers and we teach peace-making and reconciliation skills to community and faith leaders across a wide range of contexts. Further, we consistently seek to raise awareness of the plight of displaced people and build understanding between Londoners and refugees through the power of encounter. Alongside this, we also lead a coalition of 11 leading Christian peace organisations in curating a 9-month immersive and values-based leadership program called 'Journey of Hope'. We likewise often welcome international groups and provide a space for those involved in peace work, interfaith engagement and conflict resolution as well as those of the front lines of humanitarian crises and climate breakdown.

Cultural importance

St Ethelburga's is a thriving centre of culture within the City. We provide a vibrant community space with diverse events. For instance, our 'People of the Earth' events aim to strengthen UK communities by designing and co-creating events that bring people together across diverse cultures, faiths, and traditions. We have co-created and collaborated on events with partners such as Freedom from Torture, Paiwand Afghan Association, Camden Community Engagement, City of Sanctuary, Migrateful, and Islington Centre for Refugees and Migrants. We also host the charity Migrateful free of charge, who run cookery classes taught by refugees and migrants on their journey to integration.

Likewise, our regular 'Listen to the world' music series offers a space in which the cultural diversity of our city is meaningfully celebrated. Our performers have musical roots from across the world, from Nicaragua to Ukraine, Armenia to Sudan, and beyond. Our audience is global and intergenerational; we celebrate the traditions and talents of migrants, refugees, and asylum seekers, alongside local artists, and we often find our events are very emotional, as people are able to connect with a place of origin that is sorely missed or inaccessible due to the horrors of war, conflict, and starvation. These events are always free for guests who have sought, or who are seeking, sanctuary in the UK.

The harm that will be caused by the Development to St Ethelburga's

St Ethelburga's is situated approximately 20 metres from the site of the Development. The Development, if allowed, will result in a range of significant negative impacts which we set out below. Principle among these are our core concerns that:

- The Development will adversely impact both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- The Development will prevent the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive the period of building works, the completed Development will have a continued and long term impact through impacts on the local microclimate and other environmental effects.

Heritage impacts

Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC1 also states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. In addition, this policy states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials, and architectural detail.

London Plan Policy D9 (Tall Buildings) states 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, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

Policy CS10 (Design) of the City of London Local Plan 2015 (hereafter "Local Plan") seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. This includes ensuring that the bulk, height, scale, massing, quality of materials, and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

Local Plan Policy CS14 (Tall Buildings) requires proposals for tall buildings to consider the character and amenity of their surroundings, and the significance of heritage assets and their settings. Neither of which appear to have been clearly addressed as part of this application in relation to St Ethelburga's.

Further, Local Plan Policy DM12.1 (managing change affecting all heritage assets and spaces) requires development to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

Our primary concern is in relation to the impact of the construction of the Development on the fabric of the Grade 1 Listed Building. The EIA for the Development records that the proposed works will cause 'adverse effect interactions in relation to noise, vibration and built heritage at St Ethelburga's Centre for Reconciliation and Peace. The effect interaction is considered to be significant'.

The Heritage, Townscape and Visual Impact Assessment (hereafter "HTVIA"), which forms part of the Environmental Statement volume 2, states at paragraph 7.2 that:

> *"In terms of heritage receptors, there would be significant cumulative effects ranging from moderate to major adverse as a result of demolition and construction works for the Proposed Development, in respect to the Bishopsgate Conservation Area, Bank Conservation Area, and the Church of St Botolph, the Church of St Ethelburga, the Cathedral Church of St Paul, and the Church of All Hallows. All effects would be temporary."*

Table 7.1 of the HTVIA goes on to set out that the sensitivity of the Church of St Ethelburga to construction is 'high' and both the 'Significance of effect and nature of effect (short term-temporary)' would be 'Moderate, adverse, significant' and that the 'Significance and nature of effect (cumulative)' will also be 'Moderate, adverse, significant'.

We note that the HTVIA records the construction impact as being 'temporary', but neglects to identify that the temporary period will be at least six years (possibly longer), and in these terms fails to give sufficient weight to the impact of this effect.

Paragraph 7.32 of the HTVIA advises that construction effects will be mitigated through the "*…use of appropriate hoarding. Site lighting would be designed to minimise light pollution on the surroundings of the Site, using light sources of the minimum intensity required and ensuring that light is only used where needed*."

Respectfully, these measures appear to be wholly inadequate to protect the historic fabric of a building, parts of which date back over 800 years. We would like to draw to the Corporation's attention that following a meeting with the developer on 26th September 2024, it appears that the development modelling that has been done has not properly considered the unique fragility of St Ethelburga's, nor its Grade 1 listed status. We are concerned that the fabric of St Ethelburga's will not be able to withstand the extended periods of vibration from drilling, deep excavation, piling, use of other heavy machinery, and general construction work that is described in the Construction and Environmental Management Plan (hereafter "CEMP"). Previous developments adjacent to St Ethelburga's have caused significant shifts and cracks within the building. We are worried that St Ethelburga's cannot physically survive further levels of stress. There is no information, as far as we can see, in the applicant's submission documents that give us grounds to be assured on this point.

Clearly, should the construction have the significant adverse impact on the historic fabric of the building – and at present there is no evidence to demonstrate clearly that it will not – then it could, ultimately, result in the total loss of one of the City's most important heritage assets, something which would be contrary to national and local planning policy and would afford the greatest weight against granting planning permission.

The HTVIA, at Table 11.1, describes St Ethelburga's sensitivity to the effects of the development as 'high'. This confirms that there will be a material adverse impact on the St Ethelburga's that must be weighed in the planning balance against the granting of planning permission.

We note that the Planning Statement submitted with the application states the following at paragraph 8.11:

> *"Enhancement of the setting of the Guild Church of St Ethelburga the Virgin (Grade I) through the deliberate spatial separation between the Proposals and 55 Bishopsgate to enable clear sightlines toward the listed building".*

The HTVIA states that the significance of effect of the proposed development on St Ethelburga's would be 'Moderate Beneficial (Significant)' in nature. The report considers that the effect would be beneficial due to the proposal's high quality design, as well as its articulation of details.

The form and scale are utterly unsympathetic to St Ethelburga's and the proposed works risk doing significant damage to the church. The Development will tower 253.5m (AOD) over St Ethelburga's and poses an existential threat to our ability to function as a centre for reconciliation and peace. The existing building on the site is 28 storeys and the proposal seeks consent for a 53-storey building, which is a significant increase. This has not been clearly addressed as part of this application in relation to St Ethelburga's.

We do not agree with the conclusions of the applicant's heritage assessment and do not believe any strong argument has been made for the enhancement of the setting of St Ethelburga; rather, the proposed increase in density and scale on the site, from 28 storeys to 53 storeys, will harm the heritage asset. In accordance with Local Plan Policies CS10 and DM12.1, the Development must respect the setting of the building and character of the surrounding area.

The developer has not sought our views on how St Ethelburga's could be integrated into proposals, early on in the design process or at all. The Development has been presented to us without genuine consultation or consideration.

Impact on the use of St Ethelburga's

Use of the site as a cultural facility

Local Plan Policy CS11 aims 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. This includes encouraging the use of places of worship, livery halls, and other venues for cultural events alongside their primary uses. As well as protecting existing cultural facilities where they are needed, ensuring there is no net loss of cultural facilities in the City. Further, Local Plan Policy DM11.1 seeks to resist the loss of existing visitor, arts and cultural facilities.

There is a clear emphasis in the London Plan and Local Plan policies on the importance of cultural facilities and their retention and protection. However, this does not appear to have been reflected in the planning application as the proposal will result in impacts on St Ethelburga's and therefore the cultural services provided.

If the Development goes ahead, we would not be able to run our community building events because of the noise and disruption caused by the demolition and construction. Not only will the area lose an incredibly important aspect of its cultural capital if we cannot run these events, but we will also lose our funding and therefore be unable to care for our Grade 1 Listed Building.

None of this would be replicated by the proposed Open Gate building, which appears to be being offered as a replacement to the existing heritage, culture, environment, and diversity of the area. It seems to only replicate the already existing 'culture and arts programme' situated at 22 Bishopsgate. The Planning Statement (5.17) explains that this has been 'designed to celebrate local heritage' and invite 'a more diverse community to the area'. St Ethelburga's is a keystone of local heritage and nurturing and celebrating our diverse community is central to the work that we do. However, rather than investing in and celebrating St Ethelburga's, the Development poses an existential threat to the existence of St Ethelburga's and the very activities which result in successfully welcoming 'diverse community' into the area.

Construction impacts

Local Plan Policy DM15.7 (Noise and light pollution) requires that 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. Local Plan Policy DM10.1 (New development) seeks to ensure that development does not cause unacceptable wind impacts at street level.

The programme for the proposed demolition and building work indicates that it will take at least 6 years to complete and probably longer given the extensions that are normal with major building works. Even if this does not physically damage the building, this would make the Nave of limited use and would severely disrupt or entirely prevent our projects from running. The vibrations of drilling, the noise of building and construction, the resultant pollution and dust, the effect on traffic, and the disruption to pavement traffic and accessibility are factors that would render it impossible to use this space during construction. It would lose its peaceful ambiance.

Many of our regular projects run within or overlap with the proposed site working hours of Monday to Friday 8.00 – 18.00 and Saturday 8.00 – 13.00. We are further concerned because we have heard suggestions that these working hours may be changed to Monday to Friday 9.00-19.00 and Saturday 9.00-14.00, which would significantly impact our evening events. The impact of 'noisy works' proposed to take place between 10.00 – 12.00 and 14.00 – 16.00 on weekdays would be destructive of events that we run, especially in the Nave but also in the Tent. The unpredictable "*extended working hours … required for drilling and placing concrete for these piles*" (CEMP, p. 35), the pouring of concrete in the basement (CEMP, p. 36), and other out of hours working would also make it difficult for us to schedule any events free of the risk of disruption from the works. With the Nave and Tent incapacitated and their character disrupted, many of our projects, which benefit from the unique history and ambiance of the Nave and Tent, will not be able to run. This would result in St Ethelburga's losing funding and being unable to maintain the building.

The disruption, vibrations, and noise caused by the demolition and construction phases of the Development would result in us no longer being able to run our venue hire business. This would both be a loss to the culture of Bishopsgate and would also make it more difficult, if not impossible, to support our charity and St Ethelburga's building. All of this would be severely impacted by the Development.

As set out above, we regularly run peacebuilding workshops, interfaith dialogues, prayer, meditation and contemplation gatherings, and various other events within the Bedouin Tent. It is unlikely that we would be able to run any of these gatherings and events during the demolition and construction phases of the development. The noise and vibration would simply be too much. With this important space rendered impoTent and unusable, our charity objectives and the running of our projects will be severely impacted. The Tent is the centre of much of our interfaith work and peacebuilding, areas in which St Ethelburga's has an important history.

The Development also threatens the character of the Peace Garden. During the demolition and construction phases of the Development, the effect of dust, vibrations, and noise pollution are liable to severely diminish, if not destroy, the Garden as a rare green space and a peaceful oasis for the community.

The submitted Framework Construction Logistics Plan and Outline Construction Management Plan do not provide any specific details or reassurance that St Ethelburga's will be appropriately protected during the demolition and construction period and impacts minimised, where possible. If the application was to be approved, we recommend a Construction and Environmental Management Plan be imposed which makes specific reference to protection measures for the St Ethelburga building.

Wind impacts

The Environmental Statement contains a wind microclimate report which identifies strong winds in Bishopsgate and a concentration of wind close to St Ethelburga's. We have noticed a wind tunnel effect between St Ethelburga's and the adjacent 100 Bishopsgate building. The wind force caused by the tunnelling effect has already caused significant damage to our building. We have been forced to board up one of the large windows in the Nave because it was buckling under the force of the wind. The Development will significantly extend the length of the Bishopsgate wind tunnel, increase winds, and threaten St Ethelburga's. We are concerned from our conversations with the developer and from the wind survey that wind modelling has not taken into account the fragility of our Grade 1 Listed Building, nor our unique situation.

The submitted Wind Microclimate Assessment identifies that there will be increased windiness within areas around Great St Helens and Bishopsgate which are already identified as areas where strong wind occurs. We urge the Corporation to ensure that the mitigation measures identified are sufficient, and conditioned appropriately. Further, once constructed, additional wind testing should take place to ensure the mitigation measures are working correctly and relevant wind levels are not being exceeded, with the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors.

Light impacts

The Development will be greatly increased in height and, aside from the first 4 storeys, will be closer to our centre. We believe that proper consideration has not been made for our rights of light. We will be overshadowed and the fragile ambiance of St Ethelburga's will be severely impacted. This will affect specific events and long-term projects, such as our workshops on connecting with nature (which will be much harder to run in the absence of natural light) as well as negatively affect our day to day operations and likely threaten the health of the Peace Garden.

The effect on our site has been excluded from the Limited Daylight Survey and we have not been considered in the Radiance-based MDF analysis and report. The Planning Statement (7.202) asserts that there will be a 'negligible' (not significant) effect on St Ethelburga's, however this is still an impact. Once completed, the compounding effect of the wind tunnel and the obstruction of light from the new development towering over our space would permanently change the nature of St Ethelburga's.

Ecology and biodiversity Impacts

Although the planning application refers to improving ecology and biodiversity by introducing spaces and trees, no comment has been made about the destruction of existing ecology and biodiversity, a key site of which can be found in our garden. Outside our site, the Development will have an impact on the Ginkgo tree next to the Development, which is the only tree in the local streetscape. The developer's proposed plan is to screen it from above and at ground level and carry on construction around it. No proper consideration seems to have been given to the prospects of this tree over 6 years of development. Having observed the effect of other developments in Bishopsgate on the natural environment, we would not expect this tree to survive.

Conclusion

We believe that the developer has not recognised the cultural importance and historic value of St Ethelburga's, nor the potentially devastating consequences of their development on our building and work. By way of clear example, the CEMP (p. 23) names St Ethelburga's as a key stakeholder for local engagement and our activity is listed as 'Hospitality - Event Space', which does not accurately represent the activity of our organisation and building. The developer and its advisers have failed to recognise the importance of the heritage of St Ethelburga's, the sensitivity of the building to development, and the work we do.

Demolition work at 99 Bishopsgate is intended to commence in April 2026 and will create a level of disturbance, nuisance, noise, dust, and vibrations for the first 2 years of demolition and basement works. There will then be a further 3 or 4 years of construction work, which will make the continuation of our charitable activities, trainings, public talks, consultancy, faith and cultural events impossible. Without exception these activities require a quiet and peaceful environment and also depend on our reputation and iconic value of an oasis of calm in the City. Such circumstances will result in the loss of most of our funding. Furthermore, the aforementioned disturbances will render the venue hire business unworkable, thus destroying the charity's means to support itself and pay for the upkeep of

our Grade 1 Listed Building. In this scenario, St Ethelburga's would likely cease to exist and the City of London will therefore lose a priceless space of historic and cultural value which is a cornerstone of the character of the local area.

The developer's application does not appropriately respond to London Plan Policies D9, HC1 or HC5 or Local Plan Policies CS10, DM10.1, DM11.1, DM12.1 or DM15.7. In addition, when considering the planning balance, the proposed development will result in the following impacts on St Ethelburga's which are material considerations:

- Unreasonable disturbance, nuisance, noise, dust, and vibrations during the demolition and construction period;
- The proposal does not protect St Ethelburga's and rather jeopardises it's function and useability as an important cultural venue;
- Increased windiness within areas around Great St Helens and Bishopsgate which has the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors; and
- Failure to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

St Ethelburga's and the work that we do reflects the very best of the City and remains true to its ancient purpose: we continue to offer a space for connection with the sacred and with our deepest human values, protecting them against erosion. We are not opposed to progress or change - indeed responding constructively and in the interests of our community to progress, change, and crisis are at the heart of our mission and history. However, for the reasons set out in this objection, the Development will irrevocably disfigure and devastate St Ethelburga's.

We urge the Corporation to consider the concerns raised in this objection and ensure that these are appropriately addressed as part of any further application documentation and, if approval is granted, conditioned accordingly.

Yours sincerely,

[redacted]

Clare Martin

Co-Director

[redacted]

Tarot Couzyn

Co-Director

St Ethelburga's Centre for Reconciliation and Peace, 78 Bishopsgate, London, EC2N 4AG

St Ethelburga's Centre for Reconciliation and Peace is a company limited by guarantee
Registered in England and Wales no: 6408424 and a registered charity no: 1121983

St Ethelburga's
Centre for Reconciliation and Peace

We are making an objection to the full application (ref. 24/00836/FULEIA) for a 53 storey (plus plant) high rise development at 99 Bishopsgate (hereafter referred to as 99 Bishopsgate and the "Development") directly opposite our centre, St Ethelburga's Centre for Reconciliation and Peace, at 78 Bishopsgate (hereafter referred to as "St Ethelburga's").

Summary

The proposed development, if allowed, will result in a range of significant negative impacts on St Ethelburga's, principally:

- An adverse impact on both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- Prevention of the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive this, a continued and long-term impact through impacts on the local microclimate and other environmental effects.

For the reasons set out in this objection, it is our view that the proposed development conflicts with policies of the development plan, and that these conflicts attract such significant weight as to outweigh any public benefits in favour of the scheme. We therefore urge the City of London Corporation, and the Mayor of London, to reject the planning application.

Without prejudice to this position, in the event that planning permission is resolved to be granted, we require the following safeguards to be imposed so as to minimise the impacts on St Ethelburga's:

- Direct support in offsetting the financial impact that the construction will have on St Ethelburga's.
- Investment in St Ethelburga's in recognition of its status as a unique and valuable cornerstone of local culture and heritage.
- Specialist consideration and surveying of the impact of wind and vibrations on our fragile and historic Grade 1 listed building.
- Specialist monitoring of vibrations and movement within our Grade 1 listed building. Likewise, specialist repair if required.
- Limitations on site working hours and noisy works so as to lessen the severity of disruption to St Ethelburga's; this would include especially strict limitations on site working hours and noisy works so as to avoid disruption to St Ethelburga's higher-value evening events (18.00 - 21.00) and Saturday events (10.00 - 16.00).
- Financial contributions to triple glazing to lessen the noise pollution caused by building works and protect St Ethelburga's historic windows.

- Regular cleaning of the windows and specialist cleaning of the stone facade, which will be affected by the dust from demolition and construction. Potentially redecoration of the bell tower if particularly affected.

About St Ethelburga's place in the City

St Ethelburga's, named after the first leader of a monastic order for women in England, was first recorded in 1250. It is a Grade 1 Listed Building which was one of only 8 City churches to survive the Great Fire of 1666. It also survived the Blitz and a major IRA bombing in 1993. It was proposed that St Ethelburga's be demolished after the bombing, but the public and influential figures in the City recognised the importance of the church and its role in the community and opposed demolition. St Ethelburga's was restored as a Centre for Reconciliation and Peace and the building was formally reopened by the then Prince, now King, Charles in 2002.

Since 2002, St Ethelburga's has been dedicated to reconciliation and peace. We run various programs focused on community reconciliation, peacebuilding, interfaith dialogue, refugee inclusion, spiritual ecology, and navigating climate and ecological crises. The foundation of all of our work is the symbolism and historic importance of St Ethelburga's as a place of peace and sanctuary. It has had a tangible impact on the lives of many of those with whom we have worked. It stands on ground that has been consecrated for at least 800 years. Our work relies on the peaceful, quiet, and secluded ambiance of our building.

The building and grounds

The following are the key elements that make up St Ethelburga's:

The Nave

The proposed development will be situated directly opposite the Nave of St Ethelburga's, which is located behind the historic facade and bell tower. The Nave is at the heart of the building and our work. It is here that we regularly run trainings, talks, workshops, and music events. We also offer this as an affordable venue for hire. It is an important space for dialogue, peace and reconciliation, and community building. For instance, in the wake of October 7th and subsequent events, the Nave was used by the Lord Mayor of London to bring together senior Jewish, Muslim, and Christian leaders.

The Peace Garden

The Peace Garden is a rare space of tranquillity in the heart of the City. It is open to the public and is a notable stop on city walking tours. The garden is ecologically diverse, containing ferns, roses, olive trees, and vines among other plants, and has won 'Flowers in the City' awards from The Worshipful Company of Gardeners. Its central fountain retains its original column and we believe it is the only working historic fountain in the City.

As well as benches and seating, the garden also contains a number of attractions for visitors who come to and enjoy the garden, including:

- A statue by Naomi Blake, who is known for her work reflecting her Holocaust experiences and for her vision of uniting faiths, building understanding between religions and her hope for the future;
- A plaque celebrating the reconciliation between the British and Japanese soldiers who fought each other in Burma;
- A memorial plaque to Edward Henty, who was killed in the 1993 bombing; and
- A Peace Pole, which is an internationally-recognized symbol of humanity's desire for peace and connects us with many other important locations across the globe.

People come and use the garden for many reasons: it provides the public and our community with a place to gather and meet, to take some time away from the surrounding busyness, to connect with nature and our wider humanity, and for contemplation and reflection in hard times.

The Bedouin Tent

The Bedouin Tent is situated in the courtyard of St Ethelburga's. It is woven with goat's hair and fitted with stained glass windows, hand carved doors, intricate metal work, and mosaic tiling. The Tent was conceived and constructed as a response to 9/11: it is a meeting of East and West and a place for non-hierarchical dialogue, where all perspectives are welcomed equally. The Eastern-style design contrasts the Western ecclesiastical architecture and highlights the need to build community across differences. This is reflected in the architecture of the tent, designed by Professor Keith Critchlow around the principles of sacred geometry. Its design carries a hint of the architecture of Al-Andalus, southern Spain, during the mediaeval period when Jews, Christians, and Muslims lived alongside each other, sharing the space and enriching each other's cultures. Each window in the Tent contains the word 'peace' in a different language, as well as the sun and the moon, symbolising reconciliation. The window designs also incorporate trees and seeds, illustrating the reconciliation needed between humanity and the Earth.

The Tent is an acutely important space which is used for many important events around peacebuilding and community building; it has often been used as a space to bring together senior Christian, Jewish, and Muslim leaders. Like the garden, the Tent, when not in use, is open to the public as a space of peace, contemplation and reflection.

Venue hire

We have a venue hire business which has been growing at a fast rate. We have been hiring out our venue at an affordable rate for weddings, parties, exhibitions, conferences, concerts, gatherings, and book launches. The income generated from this supports the grants and funding that we receive and goes into the running of our projects and the maintenance of our building. St Ethelburga's has been a significant and growing site of culture within Bishopsgate.

Projects

Since John Medows Rodwell, who was rector to St Ethelburga's between 1843 to 1900 and published one of the very earliest reliable translations of the Qur'an into English in 1861, first

envisioned our space as a place where all faiths are welcomed, St Ethelburga's has been known as a beacon of peaceful and constructive interfaith exchange within the heart of London and is a space in which Christian, Muslim, Buddhist, and Sikh prayers are regularly held. The proposed development threatens this vital work, which is even more valuable in our current political and geopolitical climate.

St Ethelburga's also acts as an educational centre. We regularly welcome school and university groups to supplement the curriculum and run educational programs and workshops on various themes, including the importance of peace and reconciliation, the role of interfaith encounter and religious diversity within our society, and how to navigate and respond to climate and ecological breakdown. We equip young people to be leaders and community builders, peacemakers, and reconcilers and we teach peace-making and reconciliation skills to community and faith leaders across a wide range of contexts. Further, we consistently seek to raise awareness of the plight of displaced people and build understanding between Londoners and refugees through the power of encounter. Alongside this, we also lead a coalition of 11 leading Christian peace organisations in curating a 9-month immersive and values-based leadership program called 'Journey of Hope'. We likewise often welcome international groups and provide a space for those involved in peace work, interfaith engagement and conflict resolution as well as those of the front lines of humanitarian crises and climate breakdown.

Cultural importance

St Ethelburga's is a thriving centre of culture within the City. We provide a vibrant community space with diverse events. For instance, our 'People of the Earth' events aim to strengthen UK communities by designing and co-creating events that bring people together across diverse cultures, faiths, and traditions. We have co-created and collaborated on events with partners such as Freedom from Torture, Paiwand Afghan Association, Camden Community Engagement, City of Sanctuary, Migrateful, and Islington Centre for Refugees and Migrants. We also host the charity Migrateful free of charge, who run cookery classes taught by refugees and migrants on their journey to integration.

Likewise, our regular 'Listen to the world' music series offers a space in which the cultural diversity of our city is meaningfully celebrated. Our performers have musical roots from across the world, from Nicaragua to Ukraine, Armenia to Sudan, and beyond. Our audience is global and intergenerational; we celebrate the traditions and talents of migrants, refugees, and asylum seekers, alongside local artists, and we often find our events are very emotional, as people are able to connect with a place of origin that is sorely missed or inaccessible due to the horrors of war, conflict, and starvation. These events are always free for guests who have sought, or who are seeking, sanctuary in the UK.

The harm that will be caused by the Development to St Ethelburga's

St Ethelburga's is situated approximately 20 metres from the site of the Development. The Development, if allowed, will result in a range of significant negative impacts which we set out below. Principle among these are our core concerns that:

- The Development will adversely impact both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- The Development will prevent the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive the period of building works, the completed Development will have a continued and long term impact through impacts on the local microclimate and other environmental effects.

Heritage impacts

Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC1 also states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. In addition, this policy states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials, and architectural detail.

London Plan Policy D9 (Tall Buildings) states 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, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

Policy CS10 (Design) of the City of London Local Plan 2015 (hereafter "Local Plan") seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. This includes ensuring that the bulk, height, scale, massing, quality of materials, and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

Local Plan Policy CS14 (Tall Buildings) requires proposals for tall buildings to consider the character and amenity of their surroundings, and the significance of heritage assets and their settings. Neither of which appear to have been clearly addressed as part of this application in relation to St Ethelburga's.

Further, Local Plan Policy DM12.1 (managing change affecting all heritage assets and spaces) requires development to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

Our primary concern is in relation to the impact of the construction of the Development on the fabric of the Grade 1 Listed Building. The EIA for the Development records that the proposed works will cause 'adverse effect interactions in relation to noise, vibration and built heritage at St Ethelburga's Centre for Reconciliation and Peace. The effect interaction is considered to be significant'.

The Heritage, Townscape and Visual Impact Assessment (hereafter "HTVIA"), which forms part of the Environmental Statement volume 2, states at paragraph 7.2 that:

> *"In terms of heritage receptors, there would be significant cumulative effects ranging from moderate to major adverse as a result of demolition and construction works for the Proposed Development, in respect to the Bishopsgate Conservation Area, Bank Conservation Area, and the Church of St Botolph, the Church of St Ethelburga, the Cathedral Church of St Paul, and the Church of All Hallows. All effects would be temporary."*

Table 7.1 of the HTVIA goes on to set out that the sensitivity of the Church of St Ethelburga to construction is 'high' and both the 'Significance of effect and nature of effect (short term-temporary)' would be 'Moderate, adverse, significant' and that the 'Significance and nature of effect (cumulative)' will also be 'Moderate, adverse, significant'.

We note that the HTVIA records the construction impact as being 'temporary', but neglects to identify that the temporary period will be at least six years (possibly longer), and in these terms fails to give sufficient weight to the impact of this effect.

Paragraph 7.32 of the HTVIA advises that construction effects will be mitigated through the "*…use of appropriate hoarding. Site lighting would be designed to minimise light pollution on the surroundings of the Site, using light sources of the minimum intensity required and ensuring that light is only used where needed*."

Respectfully, these measures appear to be wholly inadequate to protect the historic fabric of a building, parts of which date back over 800 years. We would like to draw to the Corporation's attention that following a meeting with the developer on 26th September 2024, it appears that the development modelling that has been done has not properly considered the unique fragility of St Ethelburga's, nor its Grade 1 listed status. We are concerned that the fabric of St Ethelburga's will not be able to withstand the extended periods of vibration from drilling, deep excavation, piling, use of other heavy machinery, and general construction work that is described in the Construction and Environmental Management Plan (hereafter "CEMP"). Previous developments adjacent to St Ethelburga's have caused significant shifts and cracks within the building. We are worried that St Ethelburga's cannot physically survive further levels of stress. There is no information, as far as we can see, in the applicant's submission documents that give us grounds to be assured on this point.

Clearly, should the construction have the significant adverse impact on the historic fabric of the building – and at present there is no evidence to demonstrate clearly that it will not – then it could, ultimately, result in the total loss of one of the City's most important heritage assets, something which would be contrary to national and local planning policy and would afford the greatest weight against granting planning permission.

The HTVIA, at Table 11.1, describes St Ethelburga's sensitivity to the effects of the development as 'high'. This confirms that there will be a material adverse impact on the St Ethelburga's that must be weighed in the planning balance against the granting of planning permission.

We note that the Planning Statement submitted with the application states the following at paragraph 8.11:

> *"Enhancement of the setting of the Guild Church of St Ethelburga the Virgin (Grade I) through the deliberate spatial separation between the Proposals and 55 Bishopsgate to enable clear sightlines toward the listed building".*

The HTVIA states that the significance of effect of the proposed development on St Ethelburga's would be 'Moderate Beneficial (Significant)' in nature. The report considers that the effect would be beneficial due to the proposal's high quality design, as well as its articulation of details.

The form and scale are utterly unsympathetic to St Ethelburga's and the proposed works risk doing significant damage to the church. The Development will tower 253.5m (AOD) over St Ethelburga's and poses an existential threat to our ability to function as a centre for reconciliation and peace. The existing building on the site is 28 storeys and the proposal seeks consent for a 53-storey building, which is a significant increase. This has not been clearly addressed as part of this application in relation to St Ethelburga's.

We do not agree with the conclusions of the applicant's heritage assessment and do not believe any strong argument has been made for the enhancement of the setting of St Ethelburga; rather, the proposed increase in density and scale on the site, from 28 storeys to 53 storeys, will harm the heritage asset. In accordance with Local Plan Policies CS10 and DM12.1, the Development must respect the setting of the building and character of the surrounding area.

The developer has not sought our views on how St Ethelburga's could be integrated into proposals, early on in the design process or at all. The Development has been presented to us without genuine consultation or consideration.

Impact on the use of St Ethelburga's

Use of the site as a cultural facility

Local Plan Policy CS11 aims 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. This includes encouraging the use of places of worship, livery halls, and other venues for cultural events alongside their primary uses. As well as protecting existing cultural facilities where they are needed, ensuring there is no net loss of cultural facilities in the City. Further, Local Plan Policy DM11.1 seeks to resist the loss of existing visitor, arts and cultural facilities.

There is a clear emphasis in the London Plan and Local Plan policies on the importance of cultural facilities and their retention and protection. However, this does not appear to have been reflected in the planning application as the proposal will result in impacts on St Ethelburga's and therefore the cultural services provided.

If the Development goes ahead, we would not be able to run our community building events because of the noise and disruption caused by the demolition and construction. Not only will the area lose an incredibly important aspect of its cultural capital if we cannot run these events, but we will also lose our funding and therefore be unable to care for our Grade 1 Listed Building.

None of this would be replicated by the proposed Open Gate building, which appears to be being offered as a replacement to the existing heritage, culture, environment, and diversity of the area. It seems to only replicate the already existing 'culture and arts programme' situated at 22 Bishopsgate. The Planning Statement (5.17) explains that this has been 'designed to celebrate local heritage' and invite 'a more diverse community to the area'. St Ethelburga's is a keystone of local heritage and nurturing and celebrating our diverse community is central to the work that we do. However, rather than investing in and celebrating St Ethelburga's, the Development poses an existential threat to the existence of St Ethelburga's and the very activities which result in successfully welcoming 'diverse community' into the area.

Construction impacts

Local Plan Policy DM15.7 (Noise and light pollution) requires that 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. Local Plan Policy DM10.1 (New development) seeks to ensure that development does not cause unacceptable wind impacts at street level.

The programme for the proposed demolition and building work indicates that it will take at least 6 years to complete and probably longer given the extensions that are normal with major building works. Even if this does not physically damage the building, this would make the Nave of limited use and would severely disrupt or entirely prevent our projects from running. The vibrations of drilling, the noise of building and construction, the resultant pollution and dust, the effect on traffic, and the disruption to pavement traffic and accessibility are factors that would render it impossible to use this space during construction. It would lose its peaceful ambiance.

Many of our regular projects run within or overlap with the proposed site working hours of Monday to Friday 8.00 – 18.00 and Saturday 8.00 – 13.00. We are further concerned because we have heard suggestions that these working hours may be changed to Monday to Friday 9.00-19.00 and Saturday 9.00-14.00, which would significantly impact our evening events. The impact of 'noisy works' proposed to take place between 10.00 – 12.00 and 14.00 – 16.00 on weekdays would be destructive of events that we run, especially in the Nave but also in the Tent. The unpredictable "*extended working hours … required for drilling and placing concrete for these piles*" (CEMP, p. 35), the pouring of concrete in the basement (CEMP, p. 36), and other out of hours working would also make it difficult for us to schedule any events free of the risk of disruption from the works. With the Nave and Tent incapacitated and their character disrupted, many of our projects, which benefit from the unique history and ambiance of the Nave and Tent, will not be able to run. This would result in St Ethelburga's losing funding and being unable to maintain the building.

The disruption, vibrations, and noise caused by the demolition and construction phases of the Development would result in us no longer being able to run our venue hire business. This would both be a loss to the culture of Bishopsgate and would also make it more difficult, if not impossible, to support our charity and St Ethelburga's building. All of this would be severely impacted by the Development.

As set out above, we regularly run peacebuilding workshops, interfaith dialogues, prayer, meditation and contemplation gatherings, and various other events within the Bedouin Tent. It is unlikely that we would be able to run any of these gatherings and events during the demolition and construction phases of the development. The noise and vibration would simply be too much. With this important space rendered impoTent and unusable, our charity objectives and the running of our projects will be severely impacted. The Tent is the centre of much of our interfaith work and peacebuilding, areas in which St Ethelburga's has an important history.

The Development also threatens the character of the Peace Garden. During the demolition and construction phases of the Development, the effect of dust, vibrations, and noise pollution are liable to severely diminish, if not destroy, the Garden as a rare green space and a peaceful oasis for the community.

The submitted Framework Construction Logistics Plan and Outline Construction Management Plan do not provide any specific details or reassurance that St Ethelburga's will be appropriately protected during the demolition and construction period and impacts minimised, where possible. If the application was to be approved, we recommend a Construction and Environmental Management Plan be imposed which makes specific reference to protection measures for the St Ethelburga building.

Wind impacts

The Environmental Statement contains a wind microclimate report which identifies strong winds in Bishopsgate and a concentration of wind close to St Ethelburga's. We have noticed a wind tunnel effect between St Ethelburga's and the adjacent 100 Bishopsgate building. The wind force caused by the tunnelling effect has already caused significant damage to our building. We have been forced to board up one of the large windows in the Nave because it was buckling under the force of the wind. The Development will significantly extend the length of the Bishopsgate wind tunnel, increase winds, and threaten St Ethelburga's. We are concerned from our conversations with the developer and from the wind survey that wind modelling has not taken into account the fragility of our Grade 1 Listed Building, nor our unique situation.

The submitted Wind Microclimate Assessment identifies that there will be increased windiness within areas around Great St Helens and Bishopsgate which are already identified as areas where strong wind occurs. We urge the Corporation to ensure that the mitigation measures identified are sufficient, and conditioned appropriately. Further, once constructed, additional wind testing should take place to ensure the mitigation measures are working correctly and relevant wind levels are not being exceeded, with the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors.

Light impacts

The Development will be greatly increased in height and, aside from the first 4 storeys, will be closer to our centre. We believe that proper consideration has not been made for our rights of light. We will be overshadowed and the fragile ambiance of St Ethelburga's will be severely impacted. This will affect specific events and long-term projects, such as our workshops on connecting with nature (which will be much harder to run in the absence of natural light) as well as negatively affect our day to day operations and likely threaten the health of the Peace Garden.

The effect on our site has been excluded from the Limited Daylight Survey and we have not been considered in the Radiance-based MDF analysis and report. The Planning Statement (7.202) asserts that there will be a 'negligible' (not significant) effect on St Ethelburga's, however this is still an impact. Once completed, the compounding effect of the wind tunnel and the obstruction of light from the new development towering over our space would permanently change the nature of St Ethelburga's.

Ecology and biodiversity Impacts

Although the planning application refers to improving ecology and biodiversity by introducing spaces and trees, no comment has been made about the destruction of existing ecology and biodiversity, a key site of which can be found in our garden. Outside our site, the Development will have an impact on the Ginkgo tree next to the Development, which is the only tree in the local streetscape. The developer's proposed plan is to screen it from above and at ground level and carry on construction around it. No proper consideration seems to have been given to the prospects of this tree over 6 years of development. Having observed the effect of other developments in Bishopsgate on the natural environment, we would not expect this tree to survive.

Conclusion

We believe that the developer has not recognised the cultural importance and historic value of St Ethelburga's, nor the potentially devastating consequences of their development on our building and work. By way of clear example, the CEMP (p. 23) names St Ethelburga's as a key stakeholder for local engagement and our activity is listed as 'Hospitality - Event Space', which does not accurately represent the activity of our organisation and building. The developer and its advisers have failed to recognise the importance of the heritage of St Ethelburga's, the sensitivity of the building to development, and the work we do.

Demolition work at 99 Bishopsgate is intended to commence in April 2026 and will create a level of disturbance, nuisance, noise, dust, and vibrations for the first 2 years of demolition and basement works. There will then be a further 3 or 4 years of construction work, which will make the continuation of our charitable activities, trainings, public talks, consultancy, faith and cultural events impossible. Without exception these activities require a quiet and peaceful environment and also depend on our reputation and iconic value of an oasis of calm in the City. Such circumstances will result in the loss of most of our funding. Furthermore, the aforementioned disturbances will render the venue hire business unworkable, thus destroying the charity's means to support itself and pay for the upkeep of

our Grade 1 Listed Building. In this scenario, St Ethelburga's would likely cease to exist and the City of London will therefore lose a priceless space of historic and cultural value which is a cornerstone of the character of the local area.

The developer's application does not appropriately respond to London Plan Policies D9, HC1 or HC5 or Local Plan Policies CS10, DM10.1, DM11.1, DM12.1 or DM15.7. In addition, when considering the planning balance, the proposed development will result in the following impacts on St Ethelburga's which are material considerations:

- Unreasonable disturbance, nuisance, noise, dust, and vibrations during the demolition and construction period;
- The proposal does not protect St Ethelburga's and rather jeopardises it's function and useability as an important cultural venue;
- Increased windiness within areas around Great St Helens and Bishopsgate which has the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors; and
- Failure to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

St Ethelburga's and the work that we do reflects the very best of the City and remains true to its ancient purpose: we continue to offer a space for connection with the sacred and with our deepest human values, protecting them against erosion. We are not opposed to progress or change - indeed responding constructively and in the interests of our community to progress, change, and crisis are at the heart of our mission and history. However, for the reasons set out in this objection, the Development will irrevocably disfigure and devastate St Ethelburga's.

We urge the Corporation to consider the concerns raised in this objection and ensure that these are appropriately addressed as part of any further application documentation and, if approval is granted, conditioned accordingly.

Yours sincerely,

[redacted]

Clare Martin

Co-Director

[redacted]

Tarot Couzyn

Co-Director

St Ethelburga's Centre for Reconciliation and Peace, 78 Bishopsgate, London, EC2N 4AG

St Ethelburga's Centre for Reconciliation and Peace is a company limited by guarantee
Registered in England and Wales no: 6408424 and a registered charity no: 1121983

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Dr Joy Carter
Address: [redacted] Winchester

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Highly concerned about the impact on St Ethelburga's Centre for Peace and Reconciliation.
The important work of the Centre requires a peaceful space. The length and nature of the proposed work is likely to make our building unusable.

METROPOLITAN PUBLIC GARDENS ASSOCIATION

Chairman: Rex Thornborough MStJ, RD
c/o secretary@mpga.org.uk

16 October 2024

Dear Planning Committee

99 Bishopsgate London EC2M 3XD Ref. No: 24/00836/FULEIA

The MPGA is a long-established charity, founded in 1882, which has been involved in the London gardening world for over a century. It was set up to meet the need for public open spaces, including churchyards and burial grounds, as the urban population expanded. We keep a close eye on planning applications, the Green Belt and any parks and gardens under threat. It is therefore with great concern that we hear from our sister organisation St Ethelburga's Peace Garden of the likely exacerbation of wind tunnel effect and significant loss of light on its projects and facilities if re-construction of the tower at 99 Bishopsgate (adding an extra 100m in height) goes ahead.

We note from the MDF-based Radiance Report (document 24_00836_FULEIA-RADIANCE-BASED_MDF_REPORT-1556512.pdf) that consultants were not even asked to assess the impact of loss of light on St Ethelburga's. Perhaps that is because it is not a residential building and there is no methodology for assessing impact on this kind of facility that supports projects for peace and reconciliation. We also understand from St Ethelburga's that until a few weeks ago the planners were completely unaware that there is *already* wind tunnel effect, and that 'turbulence' has had a negative effect on the Grade 1-listed building, which dates back to 1411 and survived both the Great Fire of 1666 and the IRA bomb of 1993.

We very much hope and would urge that the GLA uses its powers to delay proceedings until a proper right to light assessment on the impact of the development on St Ethelburga's has been undertaken, and that sufficient time is granted for appropriate mitigation of all the negative effects (including wind and the several-years disruption of the construction phase) to be put in place.

As a general point we would urge the planners to consider the negative impact of yet another skyscraper (99 Bishopsgate would become the City's fifth tallest) on all workers and residents and faith communities in Shoreditch. In this part of the City only a handful of precious public open spaces such as St Ethelburga's Peace Garden remain. We must protect the few we have left.

Kind regards

Rex Thornborough MStJ RD, Chairman
The Metropolitan Public Gardens Association
Registered Charity number 303330

President: Hugh Johnson OBE
Vice Presidents:
The Dowager Marchioness of Salisbury
The Rt Rev & Rt Hon the Lord Bishop of London
The Master, The Worshipful Company of Gardeners
Viscount Davidson, Sir David Howard Bt, Wesley Kerr OBE
Christopher Woodward, Alastair Gould

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Development Division
Department of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Date: 17 October 2024
Your ref: 24/00836/FULEIA
Our ref: 303118.NEW
Direct:
Email: [redacted]

By email to PLNComments@cityoflondon.gov.uk and by special delivery

Dear Mrs Williams

Planning Application 24/00836/FULEIA – 99 Bishopsgate London EC2M 3XD

1. Introduction

1.1 We have been instructed by The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London to advise in relation to the above planning application.

1.2 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:

(a) [redacted]7 St Helen's Place;

(b) [redacted]Great St Helens;

(c) [redacted] and [redacted] Bishopsgate;

(d) [redacted] Camomile Street; and

(e) [redacted]and [redacted] St Mary Axe.

1.3 We have undertaken a review of the available information relating to the above planning application and we have substantive concerns as to the potentially adverse effect the proposed development could have on the levels of available light to the above properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.

2. Daylight and Sunlight Impacts

2.1 Our client's property at 33 Great St Helen's (Daylight and Sunlight and Light Spillage) has been identified as sensitive receptors in Chapter 11 (Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage) of the Environmental Statement submitted with the application.

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Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

2.2 The Environmental Statement (Table 10.6) reports that at 33 Great St Helens, 10 windows (of a total of 11) and a total number of 4 rooms (of a total of 4) are expected to meet BRE Guidelines on daylight levels following the construction of the proposed development and any relevant cumulative schemes. As a consequence, a total of 1 window and 0 rooms would experience a greater than 20-29.9% reduction in daylight as a consequence of the proposed development.

2.3 The identified effect of the proposed development and other development schemes within the vicinity of 33 Great St Helens is of great concerns to our clients who have already experienced the detrimental impact upon the function, operation and amenity of their buildings due to overshadowing and the loss of daylight and sunlight. These concerns are reflected at Table 10.9 of the Environmental Statement.

2.4 When considered cumulatively, at 33 Great St Helen's, 9 windows (of a total of 11) and a total number of 4 rooms (of a total of 4) are expected to be below BRE Guidelines on daylight levels. Notably, the cumulative impact of neighbouring development will ensure that nearly 70% of the windows (8 out of 11 windows) of this residential property will experience a greater than 40% alteration in daylight levels when assessed against the BRE Guidelines following the construction of the proposed development. Similarly, the cumulative impact of neighbouring development will ensure that all of the rooms of this property will experience a greater than 40% alteration in daylight levels when assessed against the BRE Guidelines following the construction of the proposed development.

2.5 As the Environmental Statement concludes (see paragraph 10.272), this would result in a "major adverse impact" on the property and the overall effect on this property would be "significant". Whilst this establishes a clear planning harm, it is also an infringement of private law rights to light by creating a substantial interference with the use and enjoyment of our client's properties.

2.6 We have yet to conclude our detailed impact assessment of the proposed development and reserves our position in relation to these issues. We do, however, have serious concerns that 33 Great St Helens will experience a significant adverse impact as a result of the construction of another tall building in this area. As a consequence, the findings in the Environmental Statement show a clear risk that our client's enjoyment of their property will be materially affected.

For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.

Yours faithfully

[redacted]

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Theodora Cadbury
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The disruptions caused by this development will severely impair the ability of nearby charity St Ethelburga's to operate. They are a vital national charity offering crucial peacebuilding, conflict resolution, and interfaith dialogue events - much of which will be near-impossible both due to the long-term noise and disruption to the site of many of its activities, and in terms of impact on income for activities on-site through disruption to venue revenue.
It's not only disruption during the development that concerns me. Once completed, the building will obstruct St Ethelburga's light, and will increase extreme winds (already increased due to other nearby developments). This will forever detrimentally impact the ambiance of the space, in particular the Peace Garden, and will make coming through the doors of St Ethelburga's to experience the quality of what the charity offers an unpleasant and distinctly un-peaceful experience.
I personally have experienced the deep cultural, historical, and spiritual importance of St

Ethelburga's, both as a site and a charity delivering such important work. The proposed development will impact this in such a way that I am not sure the centre will be able to continue doing its important work - and surely this is of greater importance than yet another high-rise building in central London.

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Case Officer: Amy Williams

Customer Details

Name: Dr Mark Owen
Address: [redacted] Milford on Sea Lymington

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:It is clear this development will have a significant, and possibly disastrous, detrimental impact on St Ethelburga's Centre for Reconciliation and Peace. As a long time supporter, and collaborator (we have a formal partnership as the University of Winchester), St Ethelburga's has become an internationally renowned centre for peacebuilding and reconciliation knowledge and programming. Whilst in the short-term the development will have a devastating impact on the use of the Centre, and the funding to keep it running, in the longer term it will materially degrade the surroundings and ambience, undermining its ability to operate as a viable charity, and putting this vital peacebuilding centre at serious risk of closure at a time when it is arguably needed more than ever. Once completed, the currently proposed development will obstruct the Centre's light, will increase damaging and unpleasant winds, increase noise and footfall, and irreversibly degrade the Centre's amenities and environment. This is surely unacceptable, and against planning conditions.

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Customer Details

Name: Miss Kelly Waugh
Address: [redacted] Torquay

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:This development would seriously affect a peace centre, which holds a note of faith, and creates connections within London, the UK, and also worldwide.

St. Ethelburga's is a historic site, and a unique venue of significant importance in London, which I feel deeply touched when attending the events held there, and the new people I meet.

The building of the new site, and its permanent structure would seriously impact St. Ethelburga's. It would impact its whole runnings during such a prolonged construction, with all that entails a large development, creating lengths of time when events would not be able to run. In the much longer term the building's beautiful gardens, and unique architecture would be affected by the

blocking of light by such a large structure in close proximity.

The city has many huge buildings with little to offer, but St. Ethelburga's is a small site of wonder, with no comparison and its loss would be a loss for the whole city!

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Customer Details

Name: Ms Susie Talbot
Address: [redacted] Landscove

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I'm writing to object to the proposed development given the detrimental and likely permanent impact on the operation of St Ethelburga's Centre for Reconciliation and Peace. This is a vital space in London for peaceful, quiet, public gatherings to address crucial UK and global challenges - any reduction in such services would negatively impact social cohesion in the UK at a time when such efforts are required more than ever, due to ecological-related anxiety, cost of living challenges and tensions related to conflicts in Europe. The proposed demolition and construction would have an immediate impact on the physical setting of an historical Grade I listed building and the financial ability of St Ethelburga's to operate, with severe impacts on its short-term and long-term viability as a charity. It is essential that diverse interests are respected and represented in all parts of London and that this location does not simply become an undifferentiated set of similarly built environment. Further, the environmental impact to the UK of

this unnecessary demolition and construction is not outweighed by private interests. I request that the City of London takes a long-term view of the social fabric of this location and rejects this proposal.

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Customer Details

Name: Mr John Woodhouse
Address: [redacted] South Norwood LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The disruptions caused by the development will severely impair the ability of St Ethelburga's charity to operate, resulting in them not being able to offer crucial peacebuilding, conflict resolution, and interfaith dialogue events (perhaps in a time when this is most acutely needed in the world).
The development, once completed, will obstruct the Centre's light, will increase damaging and unpleasant winds, and how this will detrimentally impact the ambiance of the space, our Peace Garden and the quality of what St Ethelburga offers.
I have found the centre to be a haven of peace in a troubled world. My experience has convinced me that because of the cultural, historical, and spiritual importance of St Ethelburga's, it is of vital importance. The proposed development threatens this.

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Customer Details

Name: Dr Justine Huxley
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:This development should not go ahead. It will severely disrupt the operations of St Ethelburga's Centre for Reconciliation & Peace at 78 Bishopsgate. Their programme activities will be impossible during daytime hours Once complete, the development will have a huge impact on the Centre's light, will create damaging and unpleasant winds, and how this will wreck the atmosphere and sacred nature of the space, and the Peace Garden, the Tent. What St Ethelburga's offers is entirely unique in the UK, and is deeply rooted in the place and the stories of the building and its history. They cannot simply hire other spaces to do their work - because firstly, their work is rooted in the location, and secondly because hiring venues is prohibitively expensive. The centre has iconic value - people who visit it and attend programmes comment on a regular basis that it is 'an oasis of peace' and that there is nowhere else in the UK offering this kind of

work, which is so much needed in our current times. The peacewprk is also dependent on an income stream from venue hire, which will mostly likely be slashed during the demolition and building period. Unrestricted income of this kind is essential to the charity's functioning and will make covering their costs extremely challenging. I was working at the Centre when Brookfield were responsible for the development at 100 Bishopsgate and St Ethelburga's was on the brink of going bankrupt because of it. Almost all the staff were made redundant - including myself - and it was years before the centre could offer the full potential of it's peacework again. Having survived that and built the work and the venue hire income back up to what it was really worth, it would be a travesty if this development went ahead and risked the same thing all over again. In a country that is dangerously polarised, we cannot afford to lose this unique amenity. Besides which the development seems entirely uncessary. The existing building is not old!

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Customer Details

Name: Ms Jeanne Mynett
Address: [redacted] Catford London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I have only just become aware of the threat that this new development right beside and towering over St. Ethelberga's poses to the very valuable work that their interfaith centre does both within and beyond the boundaries of the City of London. Understanding and co-operation between the different faiths in our country and across the world is a vital necessity at this time and St.E.'s has long and effective experience in this work. I have been present at several oof their offerings and have benefitted from them in my own local interfaith involvement. The staff and users there are sure that their work will be curtailed and undermined both by the ongoing construction work, including its noise and disturbance to their premises, and the overwhelming presence of the tower block proposed so close to their unique Kurt and church building. It is a most valuable contribution to the City of London's culture and offering to the city and the whole country which these building plans threaten.

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Customer Details

Name: Mr Martin Weightman
Address: [redacted] Forest Row

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I submit this application as the Director of the All Faiths Network, an interfaith and religious freedom organisation active in the UK and elsewhere.
Whilst I understand the need for development, I consider this project detrimental to what is a higher and more important purpose and for which there is not a great deal of space given to such purpose in such a busy city environment.
I writing with regards to the disturbance it will cause to St Ethelburga's Centre for Reconciliation and Peace which is directly opposite the planned building. This is a place I have used in the past, including the courtyard which lends itself to talks and social events on summer days and is open to the elements (and obviously the dust and detritus in the air that may result from a building site). The work of the Centre depends on its relatively quiet and peaceful nature in the middle of the city and there will be a great deal of disruption over the 5 -6 years it will take for the building to be

completed. The final building is also likely to block light from the Centre which again will detract from its value as a place of meeting.
The Centre is a beautiful and important landmark and is a centre for events that aim to create peace and harmony in a world that is sorely in need of it. The planned building would be a distraction and imposition on the purpose of the Centre
It is for these reasons that I oppose the planned building.

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Customer Details

Name: Sue Nicholls
Address: [redacted] Kendal

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am a supporter of St Ethelburga's opposite the proposed work. This is a place of peace and reconciliation- much needed in this time. A place of beauty and stillness and a Grade I listed building. The proposed work would impact the building's light and may prove the building unusable for extended periods meaning projects would be cancelled. I strongly oppose this disruptive building work.

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Customer Details

Name: Dr Patrick Elf
Address: [redacted] London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Having worked with St Ethelburga's to understand their positive impacts on the community through their numerous programmes, I can say that our research showed the far-reaching positive impact they have on their communities' wellbeing.
This planned project will severely impair the ability of the charity to operate in the way that currently allows them to have said impact on many members of society.
I would therefore urge you to take into consideration the crucial contribution St Ethelburga's makes to London, its people and beyond!

Date: 25 October 2024
Your Ref: 24/00836/FULEIA
Our Ref: 17826

69 Carter Lane
London
EC4V 5EQ

Ms. Amy Williams
City of London Corporation
Guildhall
Aldermanbury
London
EC2V 7HH

Dear Amy,

LETTER OF OBJECTION –PLANNING APPLICATION REF. 24/00836/FULEIA AT 99 BISHOPSGATE LONDON EC2M 3XD

DWD has been instructed to write to you on behalf of the London Diocesan Fund (LDF), to submit representations **objecting** to planning application reference 24/00836/FULEIA at 99 Bishopsgate, London, EC2M 1RP (the Development Site). The application has been submitted to the City of London and proposes the following development:

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

This letter has been prepared to set out our client's concerns with regards principally to three churches which are part of the Anglican Diocese of London that are proximate to the Development Site:

1. St Ethelburga's Church, 78 Bishopsgate, London EC2N 4AG (St Ethelburga's);
2. St Botolph-without-Bishopsgate, London EC2M 3TL and St Botolph's Church Hall (St Botolph); and
3. All Hallows-On-The Wall, 83 London Wall, London EC2M 5ND (All Hallows).

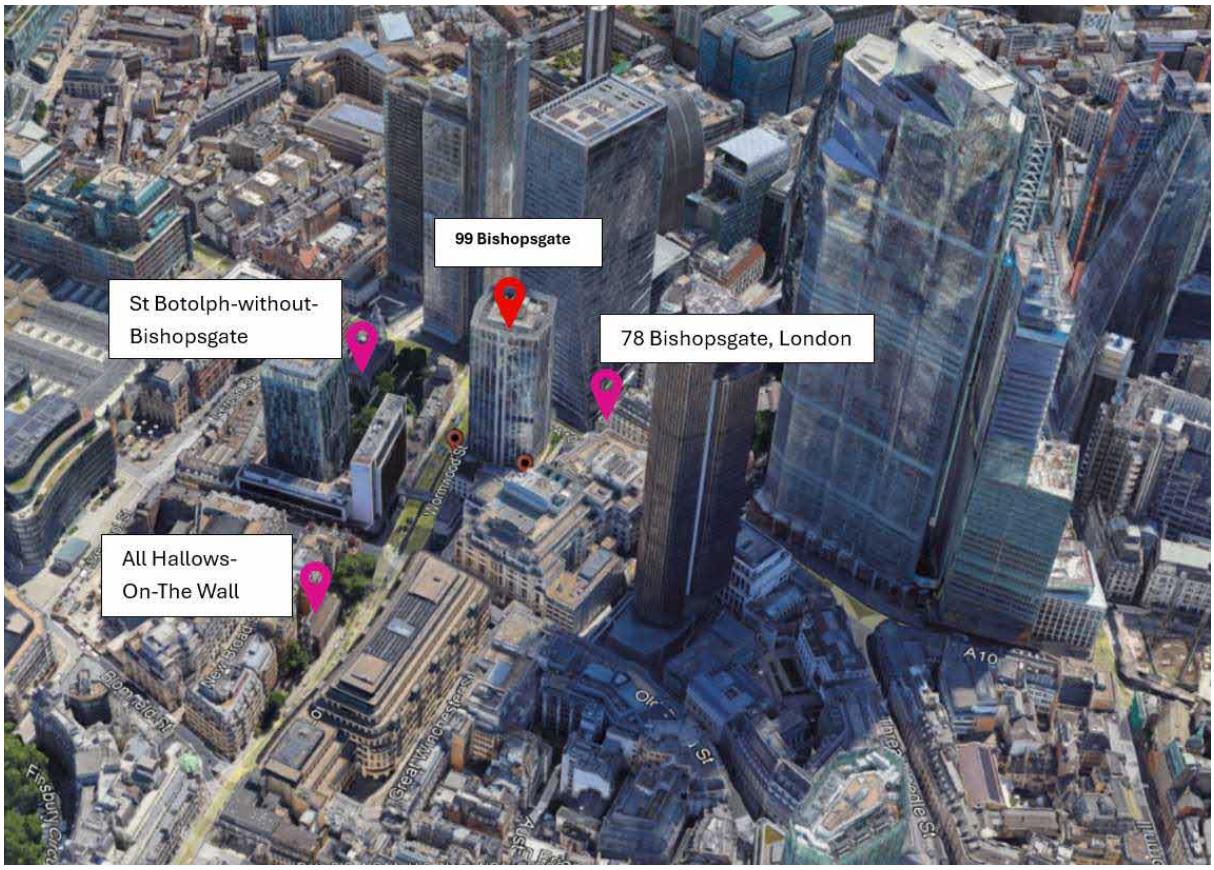
The concerns primarily relate to the scale and massing of the proposed development, daylight and sunlight impact, the heritage impact, the public realm works and the construction phase.

Our client does not object to the principle of the development or to the wider regeneration benefits it will bring to the local community and public realm. Notwithstanding this, our client wants to ensure that the heritage significance of these churches and the use of the churches are not compromised by the proposed development.

DWD is the trading name of DWD Property and Planning Limited a subsidiary of RSK Environment Limited.
Registered in England No. 15174312.
Registered Office: Spring Lodge, 172 Chester Road, Helsby, Cheshire, WA6 0AR

Below is a Google Earth view of the Development Site. It shows the Development Site in relation to our client's properties.

Locations of Churches in relation to 99 Bishopsgate



A brief summary of each of the churches is provided below:

St Ethelburga's Church, 78 Bishopsgate (St Ethelburga's)

78 Bishopsgate also known as St Ethelburga the Virgin is a **Grade I listed building** one of the principal heritage assets of the St Helen's Place Conservation Area. It is now the home to St Ethelburga's Centre for Reconciliation and Peace, a space offering community services across a range of topics including life coaching, climate change, and societal issues. The church also hosts community events and is available for venue hire. St Ethelburga's is located in the **St Helen's Place Conservation Area** and is located less than 50m to the Southeast of the Development Site. St Ethelburga is a medieval church and was first recorded in 1250 as the church of St Adelburga-the-Virgin.

St Ethelburga's Centre for Reconciliation run various programs focused on community reconciliation, peacebuilding, interfaith dialogue, radical resilience, spiritual ecology, and navigating climate and ecological crises and breakdown. The foundation of all their work is the symbolism and historic importance of St Ethelburga's as a place of peace and sanctuary.

The proposed development will be situated directly opposite the Nave of St Ethelburga's, which is located behind the historic facade and bell tower. The Development Site is situated directly opposite the Nave of St Ethelburga's, which is where the Centre regularly run trainings, talks, workshops and music events.

To the rear of the church building is the Peace Garden. This is an ecologically diverse space of tranquillity in the heart of the City. The Garden is open to the public and is a notable stop on city walking tours.

St Botolph-without-Bishopsgate (St Botolph)

St Botolph-without-Bishopsgate is located further to the North on the Western side of Bishopsgate Road. It is located approximately 70 meters from the development site. The building is **Grade II* listed** and located in the **Bishopsgate Conservation Area**. The building hosts community events, church services and other events/ activities associated with the church. The building is also home to 'The Good Coffee Kiosk' coffee shop selling ethically sourced coffee, which donates its proceeds for good causes. Additionally, different parts of the premises including the church itself are available for hire.

The church's origin date back to 1212. It was rebuilt in 1729 to a design by Nathanal Dance the Elder, a very important architect who shaped the City during the early modern period. St Botolph's churchyard also was the City's first burial grounds that was landscaped into a public garden, it is one of the major green space within the City, and is a significant public amenity. As open space with seating and tennis courts it is very heavily used by the general public.

To the west of the church building is the St Botolph's Church Hall, which is **Grade II listed**. The listing description for this property advises that it is dated 1861 and comprises a single storeyed classical building in red brick and Portland stone with pedimented end to slated roof. Where this letter refers to St Botolph, it refers to both the church building and church hall.

All Hallows-On-The Wall (All Hallows)

The Guild Church of All Hallows-On-The Wall represents a 1767 rebuilding to a design by Nathanal Dance the Younger, like his father, the surveyor for the Corporation and is a very significant figure. The present Guild Church replaced ancient 12th century building on the same site, reusing its Roman foundation. All Hallows is a Guild Church and is now home to City Gates Church which uses the church for services, as well as housing an urban youth charity named XLP. XLP which stands for the 'Excel Project' helps disadvantaged young people in London to set achievable goals and help build their future. The project focuses on people that experience anti-social behaviour at home and helps young people to stay out of gangs, providing a safe supportive environment.

The **Grade I listed building** sits approximately 85m Northwest of the Development Site on London Wall Road. It is located within the **New Broad Street Conservation Area.** With its high-level windows, the proposed development will have a very high impact on this remarkable church building.

In the next section of this letter we have provided comments on the planning application, having regard to each of the above 3 churches in the context of the proposed development and the Development Plan. The Development Plan comprises of The London Plan (March 2021) and the City of London Local Plan, adopted in 2015 (the LP). The National Planning Policy Framework (NPPF), published in December 2023, is also a material consideration in planning decisions.

Scale, Massing, Design, Daylight Sunlight and Wind Impact

The proposal introduces a 53-storey building in the City of London, positioned between our client's three churches. It is considered that the proposed development will have a harmful impact on the churches as it will dwarf them, harm their setting and overshadow the premises. We have considered each of these concerns in further detail below.

Scale, Massing and Design

The substantial bulk and massing of the proposed development, beyond the existing building, which will extend close to the street along Bishopsgate Street and Wormwood Street will result in the modern building having an overbearing impact on the churches, which are of a significantly small scale. The new building will dwarf these existing historic assets, that form an important part of the City of London's history and character of this area.

Whilst it is acknowledged that there are a number of tall buildings in the City of London, it is considered that the additional height proposed to be introduced at the Development Site is not appropriate, as a result of the harmful impact this will have on the immediate surrounding street scene.

St Ethelburga's is positioned immediately to the south of 100 Bishopsgate, which comprises of a 40 storey building. The proposed development will extend to a significantly greater height than 100 Bishopsgate, as it is proposed to be 53 storeys. Building heights further south along this section of Bishopsgate are significantly lower in height. St Ethelburga's would therefore be positioned in-between these skyscrapers and the lower height building. The additional height and massing proposed to be introduced at the Development Site is considered to have a harmful impact on St Ethelburga's, and will erode the character of this section of Bishopsgate.

The cumulative impact of tall buildings in this part of the City, which the proposed development will add to, is considered to have a harmful impact on the character of the area. The proposed development is considered to be in conflict with LP CS10 (Design), which seeks to promote a high standard of design with development having regard to its surroundings and the historic and local character of the City.

Daylight Sunlight (DLS)

Our client is concerned that there will be a detrimental DLS impact on the 3 church buildings. The submitted Environmental Statement incudes an appendix on Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage. Within this are reports prepared by GIA that assess the daylight sunlight and overshadowing caused by the proposed development. The Environmental Statement Non- Technical Summary (ES NTS) provides an overview of the results of these assessments and confirms that:

- In terms of daylight, the proposed development will result in significant adverse effects with regards to reductions in daylight amenity to St Botolph (Minor to Moderate Adverse).
- The overshadowing assessment shows that the Proposed Development (future baseline) would result in St Botolph garden experiencing a Minor Adverse effect.
- A cumulative assessment has also been carried out, as a number of other developments are proposed in the surrounding area. This shows further significant effects, experienced by St Ethelburga's and St Botolph.

The Planning Statement also discusses the results of the DLS reports and identifies at paragraph 7.198 that All Hallows will not meet BRE Guidance, when the (Vertical Sky Component (VSC) and No Sky Line (NSL) tests are carried out and will experience a negligible (not significant) daylight impact. It is noted that all Hallows has limited natural light as the main windows are high, and therefore any diminution of daylight will have a disproportionately adverse effect.

Paragraph 7.202 of the submitted Planning Statement considers the sunlight impact and identifies that St Ethelburga's and All Hallows will both experience a negligible (not significant) effect on sunlight.

Located to the rear of St Ethelburga's is their Peace Garden. The proposed development risks impacting upon the light that the Peace Garden receives, which could impede the ecologically diverse range of plant species that grow in this garden and also the character of the garden, which provides a tranquil space in the City of London.

It is therefore apparent that all 3 churches will experience a DLS impact. LP policy DM10.7 (Daylight and sunlight) states that "*new development should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight*." It is considered that given the above-mentioned results, that the proposals conflict with this policy.

Natural light to the worship spaces and community spaces that are actively used by the churches and community groups in all 3 church buildings is very important to the use and enjoyment of these spaces. These building would have originally been designed to benefit from natural light. Our client's premises would suffer a reduction in natural light as a result of the development and this is considered to be in conflict with the development plan, when taking into account the nature of the uses of these buildings and their historic significance.

Wind Impact

The impacts of the development on wind flow paths and intensities have been assessed within the submitted documents, including the Design and Access Statement (DAS) and RWDI's Pedestrian Level Wind Microclimate Assessment that forms part of the Environmental Statement. However, the Wind Microclimate Assessment hasn't specifically analysed the impacts of the development on the church buildings.

Whilst the section of Bishopsgate where St Ethelburga's is located been considered in the modelling and modelling has also been undertaken along Wormwood Street, a more specific analysis of the results would help our client understand the potential impacts. We have been advised by St Ethelburga's Centre for Reconciliation and Peace that a wind tunnel effect has already been created by the development of 100 Bishopsgate, which has damaged the fabric of the building and therefore understandably they are concerned that the proposed development will compound and extend this wind tunnel effect.

As mentioned above, the churches currently provide community services and events, attracting a variety of people from all ages to the Site, with the majority of visitors arriving and departing on foot. It is therefore important to understand the specific impacts of wind on particularly the entrance of the church buildings and assess whether any safety measures need to be considered, to ensure that visitors to and from the site don't experience uncomfortable wind conditions, as a result of the development..

Heritage Impact

The imposing new structure proposes to introduce 25 new storeys on top of the existing 28 storey building, to provide a 53 storey building. This development would see the existing skyscraper grow to a total height exceeding 200m.

All of the churches that this letter of objection relates to are statutory listed buildings and all are located in designated conservation areas.

Adopted Local Plan (LP) heritage policies CS12 (Historic Environment) and DM 12.1 (Managing change affecting all heritage assets and spaces) confirm that development should conserve or enhance the significance of the City's heritage assets, their setting and significance. In addition, policy CS12

confirms that the City of London will preserve and enhance the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them. Policy DM 12.1 confirms that the loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

The NPPF at paragraph 206 also confirms that that heritage assets should be protected, advising that any harm to the significance of designated heritage asset, including from development within its setting, should require clear and convincing justification. Paragraph 206 goes on to confirm that substantial harm to Grade I and Grade II* buildings should be "*wholly exceptional*".

LP policy CS10 (Design) confirms that the City of London will "*promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City*".

In addition, LP policy CS14 (Tall Buildings) confirms that the Council will refusing planning permission for tall buildings within inappropriate areas. The policy states that conservation areas are inappropriate areas for tall buildings. Whilst the Development Site is not within a Conservation Area, it is proximate to a number of Conservation Areas. The policy goes on to site that "*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.*"

The submitted Environmental Statement includes a Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy. Table 7.1 within this report considers the heritage assets proximate to the Development Site and the impact of the development on these during the construction phase. With regards to the three churches, the report considers that:

- St Ethelburga's : There will be a "*moderate, adverse, significant*" impact on the church and a "*negligible, neutral, not significant*" impact on the St Helen's Place Conservation Area that the church is located within.
- St Botolph . There will be a "*moderate, adverse, significant*" impact on the church. With regards to the Bishopsgate Conservation Area, that the church is located within the report concludes that there is a "*moderate, adverse, significant*" effect; and
- All Hallows –There will be a "*moderate, adverse, significant*" on the church and "*minor, neutral, not significant*" impact on the Conservation Area that the church is located within.

It is clear from the above, and also from reviewing the impact on other heritage assets assessed at Table 7.1 that there will be an extensive significant impact on these heritage assets during the construction phase.

Furthermore, beyond the construction phase, once the scheme is built out there will also be a permanent impact on the extensive number of heritage assets that are in close proximity to the Development Site. With regards to the three churches, the submitted impact assessment considers that:

- St Ethelburga's: The report considers that there will be a "*Moderate Beneficial (Significant) in nature.*" impact on the church that the "*The cumulative effect would be Negligible Neutral (not Significant) in nature*" on the St Helen's Place Conservation Area that the church is located within.

- St Botolph: The report considers that there will be a "*Moderate Neutral (Significant)*" impact on the church. With regards to the Bishopsgate Conservation Area, that the church is located within the report concludes that the "*The Proposed Development would result in a medium magnitude of change to the Conservation Area*" and goes on to suggest the significance of the effect would be *"Moderate Beneficial (Significant)".* The report also considers the other heritage assets associated with the church, including the church hall, church yard, drinking fountains and parish memorial which are each individually designated as Grade II heritage assets and concludes that the impact will be " *Negligible Neutral (not Significant) in nature*"; and
- All Hallows –The report considers that there will be a "*Moderate Neutral (Significant)*" impact on the church and that *"The cumulative effect would be Minor Neutral (not Significant)*" on the New Broad Street Conservation Area that the church is located within.

We disagree with the above statements made in the report, for the permanent impact, and consider that these downplay the actual harm that will be caused to the three churches, and the associated heritage assets at St Botolph including the church hall.

It is considered that the proposed development would introduce a very prominent and incongruous feature within the setting of Grade I listed churches at St Ethelburga's and All Hallows and the Grade II* listed St Botolph. The proposed development would detract from the significance of the churches as a designated heritage asset. With regards to All Hallows the proposed development will impact views from Finsbury Circus which is a Registered Park and Garden and which the All Hallows sits within the setting of. The proposed development would have a negative impact on the appreciation of this significant specific view.

The church buildings are of limited scale compared to the adjoining buildings and their prominence in the street scene has already been eroded over time. The proposed development would exacerbate this even further and the Council should take into account the cumulative impact of this proposal, alongside previously consented and built out schemes, when assessing this application.

It is noted that a number of developments have recently been approved in the immediate and wider setting of the church, however, these are generally set back from the street scene, which helps to reduce their visual impact on the immediate setting of the churches.

In addition to the above mentioned heritage assets, there are an extensive number of further heritage assets that will also be effected by the proposed development during the construction phase, together with the Conservations Areas that are located close to the Development Site.

The scale and design of the proposed development will be in stark contrast to the heritage assets that this letter focuses on, together with an extensive number of further heritage assets. The impact caused by the development to these heritage assets conflicts with LP policies CS10, CS12, CS14 and DM 12.1, as well as the NPPF. The development fails to have appropriate regard to the Development Site's surroundings and the historic and local character of the City, and the setting of the extensive number of heritage assets that are proximate to the Development Site.

LP policy CS12 and DM 12.1 are clear that development proposals should *"conserve or enhance the significance of the City's heritage assets, their setting and significance",* however it is clear that the development will fail to do this and instead will result in harm to a high number of heritage assets. Cumulatively, this impact on the significance and setting of the heritage assets is considered to be significant and substantial. There is not considered to be an exceptional reason or justification to justify this significant harm, and therefore the proposed development is considered to be in conflict with the Development Plan and NPPF.

Construction Phase Impact

Noise and Vibration

The submitted Environmental Statement includes Noise and Vibration Survey Report, prepared by Sandy Brown. The results of this survey are summarised in the submitted Environmental Statement Non- Technical Summary (ES NTS), prepared by Trium.

All Hallows and St Ethelburga's (or St Ethelburga's Church) are identified at Figure 10 of the ES NTS. Paragraph 93 of the report states that nine *"receptors (eight commercial and one place of worship) would experience Moderate Adverse (Significant) noise from demolition works, noise from basement construction and noise from superstructure works".* St Ethelburga's and All Hallows are both identified at Table 4 as experiencing this Moderate Adverse (Significant) noise impact.

The conclusions of the Noise and Vibration Survey Report confirm our client's concerns regarding the noise impact during the construction phase are valid. In particular, they are concerned noise from construction and demolition will significantly disrupt services and community meetings/ events held at the churches and in particular at St Ethelburga's, due to its close proximity to the Development Site. The churches provide a space for quite reflection in a peaceful setting, the construction phase of the development will conflict with this. Many of the services and meetings/ events held at the churches require the quiet setting that the churches offer, this is key to the reflective activities being carried out.

If development proceeds at the Development Site, it is essential that there is close dialogue with the churches to ensure that the timings of noisy works do not conflict with key services/ meetings/ events taking place in the church buildings. The churches also need to be given advance warning of when noisy works will be taking place. Close dialogue between the site contractors and representatives from the church will be essential, to ensure the impact is mitigated as best as possible. Conditions and/ or S106 obligations must be secured to ensure the contractor is required to engage with the churches and work proactively with them, both ahead of and during the construction phase.

In addition to noise concerns, there are also concerns regarding the impact of vibrations arising as a result of the construction works on the three historic church buildings. Due to their age and historic significance, these buildings risk being structurally harmed or damage arising, as a result of the construction activities. The construction methodologies need to be carefully considered, to ensure no harm arises to the heritage assets.

Traffic & Access

An Outline Construction Manage Plan, prepared by Multiplex has been submitted as part of the planning application.

The submitted Outline Construction and Environmental Management Plan identifies Bishopsgate Road (A10) as the main route for construction materials and personnel to reach the Site.

In addition to noise concerns from the construction activity itself, our client is also concerned with the impact from lorries and other heavy machinery accessing and exiting the Site. This could potentially obstruct access to St Ethelburga's. St Ethelburga's require vehicle access for vehicle drop offs/ collection for less able visitors to the church building. It is also important that there is safe access for pedestrians to and from the church buildings, and that construction vehicle movements and activities do not risk conflict with pedestrians.

As set out above, if the development proceeds at the Development Site conditions and/ or S106 obligations must be secured to ensure the contractor is required to engage with the churches and work proactively with them, both ahead of and during the construction phase.

Public Realm

It is acknowledged that the proposed ground floor public realm will provide a benefit to the public. The comments below are not an objection to the principle of the public realm design, but rather seek more information and further consideration by the applicant, to better understand its relationship with St Ethelburga's and to ensure that it will not cause a detrimental impact on St Ethelburga's.

Paragraph 55 of the ES NTS states the design of the new public realm was informed by the presence of St Ethelburga's. Page 129 of the submitted DAS also identifies that there will be framed views from the public realm out over Bishopsgate including to St Ethelburga's. The submitted documents do not however assess the impact of other elements of this proposal on St Ethelburga's, such as increased footfall and pedestrian traffic in the area.

With the proposal's publicly accessible top floor, a community/sui generis space, and the introduction of 20+ extra storeys, the Development site will attract a very high footfall, including tourists and the building's increased workforce. This will likely increase footfall significantly in the immediate surrounding area, including the number of people using the pavement outside all three church buildings which will exacerbate the existing issues of crowding along the pavements, which risks the safety of the pavement users.

The increased footfall could negatively impact the access to St Ethelburga's, with conflict between pedestrians and visitors to the church at times just before a service or meeting starts or just after it finishes, when visitors to St Ethelburga's may congregate outside the building. Furthermore, if the new public realm is not managed properly, it could result conflict with the activities taking place at the church.

In summary, whilst we are not objecting to the principle of the public realm hat is proposed we consider that the impact of this public realm on the three churches needs to be further considered, in particular for St Ethelburga's, due to the close proximity of the entrance to St Ethelburga's to the proposed public realm.

Summary

The London Diocesan Fund objects to the proposed development. The development will erode the historic significance and setting of the three listed churches at St Botolph-without-Bishopsgate, All Hallows-On-The Wall and St Ethelburga's Church. The proposed development's imposing height will impact upon daylight and sunlight received to these buildings which were originally designed to be reliant on natural light. During the construction phase, the development works risk conflicting with the use of these church buildings by the local community, who live and work in the local area.

Further consideration is required by the applicant and engagement with our client is needed to consider the impact of the tall building on the heritage assets, on the surrounding Conservation Areas and on the character of the area. Furthermore, in the event that the Council is minded to support the application, further careful consideration and close engagement with each of the churches and with the LDF is needed, to consider how the construction phase can be managed to protect the day to day use of the church buildings. This is essential to ensure that the users and community groups that utilise these buildings are not detrimentally impacted by the works and must be secured through conditions and/ or S106 obligations.

The community spaces available at all 3 churches are available for use by faith and non faith organisations. There is concern that the detrimental impact that the development will have on these community spaces, in addition to the extensive further development in the local area, will result in these buildings providing lower quality, less sought after and less attractive community space. Whilst the additional community space that is brought forward by the development will provide modern community space, the development serves to make existing community space less useable, lower quality and less attractive spaces for community groups. The Council must protect and help enhance existing community spaces, and ensure development does not impact upon the quality of these spaces.

It is considered that the proposed development is in conflict with the development plan and that the harm identified will outweigh the benefits associated with the proposed development. This is in particular with regards to the impacts on heritage assets, scale and massing, daylight and sunlight, public realm works and the construction phase. It is therefore considered that planning permission should be refused.

My client would welcome the opportunity to speak with officers at the City of London to further discuss their concerns. My client can also arrange for the Council to visit the above-mentioned churches.

We would be grateful if the City of London could continue to keep us notified on this application moving forward.

Yours faithfully,



Emma Penson
Director
DWD



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[redacted]

8th November 2024

Dear Sir/Madam,

LLOYDS BANK PLC

99 BISHOPSGATE, LONDON, EC2M 3XD (REF 24/00836/FULEIA)

We are responding on behalf of Lloyds Banking Group Plc, in relation to the above referenced planning application. This was validated by The City of London (CoL) on 9th September 2024. The description of development is as follows:

'Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.'

Background

Lloyds Banking Group is the leaseholder of 33 Old Broad Street, which is immediately adjacent to the application site. Following extensive refurbishment works over the past 18 months, Lloyds Banking Group is scheduled to reopen 33 Old Broad Street in 2025. This nine-storey building will serve as the Group's new headquarters. 33 Old Broad Street is situated to the south west of 99 Bishopsgate, immediately adjacent to the application site.

Scope of Representations

Lloyds Banking Group has no in principle objections to the proposed scheme of development for 99 Bishopsgate. Given the role of the City of London as a world leading international financial and professional services centre, with a nationally important role in the economy, we acknowledge this area is a focal point for significant levels of development activity. However in the context of its recent significant investment to refurbish and upgrade 33 Old Broad Street, Lloyds Banking Group is understandably keen to ensure this proposed scheme of development will not adversely impact its operations, both during the course of construction works and also once the scheme is complete. This response relates to the following matters:

- Mitigation of Demolition and Construction impacts
- Plant noise associated with completed scheme
- Proposed planning application drawings (and contextual information shown)

Demolition and Construction

We are aware CoL has a long established Code of Practice in place for Deconstruction and Construction Sites, the most recent version of which was published in January 2019 (Ninth Edition). This sets out what constitutes acceptable site practice within the City

We welcome the initial consideration the applicant has given to construction impacts, as set out in the Construction and Environmental Management Plan (CEMP) by Multiplex, which supports this application. Whilst we appreciate the level of detail is commensurate with that typically provided at this stage of a project, this is a high level and largely generic document which the applicant advises will be further developed and refined by the appointed Principal Contractor.

We request any planning permission is subject to a condition requiring submission and approval of a detailed CEMP prior to commencement of development (or the relevant phases of this). We also request Lloyds Banking Group are consulted by CoL in relation to any subsequent approval of details application (or applications) relating to a detailed CEMP, to allow an opportunity to review and comment.

Given the scale of the proposed scheme of development and the proximity of the application site to 33 Old Broad Street, this could potentially have an adverse impact on Lloyds Banking Group's operations during demolition and construction, particularly in relation to noise, vibration and dust impacts. It is essential such impacts are minimised as far as is reasonably practical throughout the duration of works in accordance with the CoL's own Code of Practice.

It is particularly important for Lloyds Banking Group that the reduced impact hours for noisy works, i.e. 1000-1200 and 1400-1600 (Monday to Friday) as set out within section 7 (Site Hours) of the applicants CEMP and section 3.6 of the CL's own Code of Practice, are strictly adhered to.

Section 13 (Neighbourhood Liaison) of the CEMP sets out a broad overview of the strategy the appointed contractor will follow for stakeholder engagement. This is in line with Section 2 (Community Liaison and Consultation) of the CoL's own Code of Practice. It is essential that the applicant and their appointed contractors liaise with their neighbours on an ongoing basis and Lloyds Banking Group looks forward to actively engaging with the proposed neighbourly meetings.

We have also reviewed the applicant's Framework Construction Logistics Plan (FCLP) by Momentum. This anticipates the provision of a detailed CLP prior to commencement of construction will be secured by a planning condition . We request CoL imposes a condition to this effect. We also request, as per our above comments on the CEMP, Lloyds Banking Group are consulted by CoL in relation to any subsequent approval of details application (or applications).

We note the proposed ingress and egress routes and pit lane locations as shown on Figure 4.2 (local construction routes) of the FCLP are not in the immediate vicinity of 33 Old Broad Street. However, we are mindful these proposed arrangements are to a large extent indicative in advance of the appointment of a main contractor. It therefore remains important for Lloyds Banking Group to be kept abreast of the applicant's plans in respect of construction logistics, given the scale and nature of the proposed scheme and its proximity to 33 Old Broad Street. It is essential the proposed detailed arrangements in respect of Construction Logistics do not adversely impact access and egress to 33 Old Broad Street and its associated service yard

Proposed Plant Noise

We note the proposed pavilion building, which will be adjacent to 33 Old Broad Street, would incorporate plant and machinery at 6th and 7th floor levels. The Noise and Vibration Report by Sandy Brown (which forms Chapter 7 of the Environmental Statement Part I), sets out proposed plant noise limits to the façade of 33 Old Broad Street (and other nearby buildings) based on baseline background noise levels.

As the Noise and Vibration Report states, all external plant should be designed to achieve these limits and this is typically enforced through a planning condition set by the local authority. We request the CoL imposes a condition requiring submission and approval of a supplementary acoustic report, which details

plant selections as well as associated noise attenuation measures and how they would comply with noise emission limits. In the interim, given the extent of plant and machinery proposed and number of receptors in close proximity to the application site, we also request the applicant is asked to provide indicative plant selections as part of this application, demonstrating how these would comply with noise emission limits. This would provide greater certainty to Lloyds Banking Group (and also the applicant) that the identified noise emission limits will be achievable in practice at the detailed design stage.

Planning Application Drawings

The applicant's proposed plan drawings do not incorporate any surrounding context. i.e. they do not show the building lines of neighbouring buildings, including 33 Old Broad Street. It is therefore difficult to ascertain the extent to which the existing lightwell to the south west of the building between 99 Bishopsgate and 33 Old Broad Street would be built out and the separation distances that would remain between these buildings. We therefore request the CoL asks the applicant to submit a supplementary set of proposed drawings for the relevant floors that show this wider context. This would enable Lloyds Banking Group to review and better understand any potential implications for 33 Old Broad Street.

I trust that the above is clear. We kindly request we are kept updated on the progress of this application. If you have any queries or require any additional information, please contact me or my colleague Grace Collins [redacted]

Thank you for your assistance.

Yours faithfully

[redacted]

GRAHAM TIMMS
Associate Director

EASTERN CITY

Environment Department
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Submitted via email to PLNComments@cityoflondon.gov.uk

FAO: Amy Williams, Planning Case Officer

Planning Application Ref: 24/00836/FULEIA

Re: Planning Consultation for 99 Bishopsgate, EC2M 3XD

January 2025

Dear Amy,

The Eastern City is proud to be making a representation in relation to the above planning application. We are a Business Improvement District (BID) covering the tall building cluster in the City of London. Our investment partnership is made up of the businesses that call this part of the Square Mile home, primarily financial and professional services companies that make up around 40% of the businesses in this area.

We operate under a mandate from those paying member businesses to deliver our Business Plan (2022-2027), providing hyper local area wide projects and services to support business growth and vibrancy, working with occupiers, property owners and developers and our public sector partners.

Given our holistic and strategic approach, it is appropriate that we make representations on key planning applications, and in particular, those that have an impact on the wider area, public amenity provision and ground floor public realm.

For clarity, it is not the role of the BID to explicitly support or oppose any specific planning application and this is not the purpose of this letter. Rather, we view aspects of the above application in relation to our published evidence base – namely our Public Realm Vision (2024) – which is rooted in insight, data and consultation with our member businesses, key stakeholders and the public.

We are supportive of the significant development pipeline and projected growth in the area. We see this as a positive thing for the Eastern City, bringing benefits such as increased vibrancy and economic growth to this globally important area and unique part of the City. This is an area that has driven change for 2000 years, a hub of economic activity and the growing Destination City agenda. We are excited about the opportunities provided by the future growth of the area.
In the context of this growth, our public realm and the 'spaces between the buildings' are ever more important.

We are grateful to the developer for their consultation and positive engagement with the BID through the planning process. We have shared our Public Realm Vision with them and drawn specific attention to the development's strategic location in the Eastern City, aligned with the project family routes set out in the document. We would urge consideration of these priority

areas in relation to the proposed development's wider context. In addition, the Public Realm Vision outlines our seven key principles, which are:

Welcoming publicly accessible spaces – designing spaces that are inviting and accommodating;

Resilient trees and planting – ensuring the area is as green as possible;

Lively uses and activity – creating a dynamic and energetic place;

Intuitive navigation – making it easier to reach your destination;

Historic character and lighting – celebrating and improving the heritage features;

A mobility environment which is accessible to all – establishing environments where modes of movement can co-exist;

A safe and secure neighbourhood – promoting spaces where all users feel safe.

Considering the above scheme against these principles, we welcome a number of provisions in the application and look forward to working with the developer should the scheme receive approval.

Whilst the proposed project supports all of our principles outlined above, we specifically wish to draw attention to the following aspects of this application;

Extensive opening up of the public realm so that the majority of the ground floor is publicly accessible;

New routes for pedestrians providing significantly enhanced connectivity to neighbouring developments and nearby transport interchanges, good alignment with the project family routes set out in our Vision;

Animation through the introduction of a new city market at ground;

Dedicated multi-use cultural facility with ground-floor activation;

Providing extensive green space for commuters and visitors.

We hope this is a helpful contribution ahead of the committee meeting in January 2025.

Yours sincerely

[redacted]

Nick Carty
Chair, Eastern City

MAYOR OF LONDON

Amy Williams, Senior Planning Officer
(Design and Development
Management), City of London
Corporation, PO Box 270, London,
EC2P 2EJ
[redacted]

Date: 9 January 2025

Dear Amy,

Letter of support for Intermission Youth space, 99 Bishopsgate Open Gate

I am writing to express support for Intermission Youth being offered Open Gate as a permanent space.

Intermission Youth was founded by Darren Raymond, who discovered a love of Shakespeare while in the prison system, where he met Sir Mark Rylance. The charity works with young people predominantly from Afro-Caribbean and African backgrounds who have experienced the prison system, the care system, family breakdown, have been homeless and are often at risk of criminality.

As well as great characters and stories, working with Shakespeare gives young people something much deeper - a space for self-reflection, an understanding of the human condition and empathy. The work builds confidence, connection and self-belief and helps participants make positive choices – changing their lives. The young people who have experienced being a part of this theatre company have established careers in teaching, HR, investment banking, have secured agents, pursued acting careers, and obtained Oxford University degrees. Intermission Youth has achieved all of this without a permanent space.

Through the Mayor's support, they have fostered a strong partnership with Brookfield Properties - a positive working relationship and open lines of communication. As a result, this exciting proposal is now tabled.

It's vital that all Londoners are represented through the spaces we create. Providing space within the development will be a trailblazing example of what can be achieved through meaningful partnership between cultural organisations and new development. It will contribute to the cultural aspirations of the City of London and deliver the ambitions of the Mayor of London's Cultural Strategy.

All Best wishes

[redacted]

Justine Simons OBE
Deputy Mayor for Culture and Creative Industries, London

City Hall, Kamal Chunchie Way, London E16 1ZE
mayor@london.gov.uk • london.gov.uk • 020 7983 4000

INTER+MISSION
YOUTH

Senior Planning Officer
(Design and Development Management)
City of London Corporation,
PO Box 270
London EC2P 2EJ

15 January 2025

[redacted]

Dear Ms Williams

Planning Application (24/00836/FULEIA - 99 Bishopsgate London EC2M 3XD)

Intermission Youth is writing in support of the planning application (24/00836/FULEIA - 99 Bishopsgate London EC2M 3XD) and its outlined Cultural Plan that develops a standalone Cultural Centre, currently titled Open Gate. Intermission Youth's interest is to further the discussions as the Cultural Anchor for the centre, understanding that it would become a permanent home for Intermission Youth, and we would have the opportunity to curate open invitations to community groups, schools and other cultural organisations to fulfil the vision of Open Gate as a destination for diverse, emerging creative voices to showcase and create onsite.

Intermission Youth is a registered charity that helps transform the lives of young people in London aged 11-30+ through theatre, film, whole-person support and community empowerment. Since 2008, we have worked with over 8000 young people to improve their mental health, social skills, life outcomes and outlook on their ambitions.

Our productions are collaborations with Shakespeare's original language and contemporary language devised with the young people to align the specific and universal stories of life. We have strong links with national and local entities such as Shakespeare's Globe Theatre, LAMBDA, RADA,

Patrons: Naomie Harris, The Right Reverend Rob Gillion
Ambassador: Danny Sapani

Intermission Youth, a charitable company limited by guarantee, registered in England and Wales under company number 12359502 and whose registered office is at 124 City Road, London EC1V 2NX.

Registered charity number: 1190391

The Royal Court, BBC, Arcola Theatre, Collective Acting Studio and the BFI. The young people that attend our programmes are highly motivated, passionate and come from across London.

The City of London is attractive to us as it avoids the 'postcode wars' that affects many of our young people and provides a neutral, well-connected and prominent place in London – adding value and aspirations to young people. We are also rapidly growing to provide film production, expanding on our writer's programme, and delivering drama initiatives in communities across London, including plans to launch a national touring company. As Shakespeare's original presence was in this borough, it seems a rightful place for Intermission Youth to encourage young people to bring their contemporary perspective into conversation with the histories of their city. We developed the name 'Open Gate' in response to the original suggestion of 'Fourth Gate' in the spirit of this mash-up.

After losing our original home of twelve years (St Saviours Church in Knightsbridge) we have been searching for a permanent home. We are fortunate to have support from Foster+Partners to co-design our new space with our young people. Sir Mark Rylance (Trustee) is dedicated to our mission and Deputy Mayor of Culture and the Creative Industries, Justine Simons OBE, has been championing our organisation's growth and need for a new home.

There aren't many art spaces in London (if any) conceived by young people from marginalised backgrounds and I think it is important this starts to happen, if we really want to make impactful changes. Being a part of this project is not only about housing Intermission Youth, but also about equity, reparations and moving into a more inclusive society.

We have already been on an organic 15-month getting-to-know-one another discussion and held workshops with Brookfield Properties, whereby they have been transparent and collaborative in supporting Intermission Youth's role as a Cultural Anchor and the business development growth to get there. We are unusual in that we have already developed a strong alternative fundraising approach, where we do not rely solely upon state funds and feel confident that we can develop a business model with Brookfield Properties that will help the organisation flourish.

We have begun workshops with the RSHP team to understand the building's flexibility and welcome the future sessions in co-designing with our young people to ensure the fit-out meets the multi-purpose nature of the space and that it is welcoming to creatives that we have been championing since our inception and audiences, who too often feel shut out from these arts spaces. We understand that this ethos continues the initial co-design exercises in creating the Cultural Plan and we welcome a ground-breaking approach of young people's engagement throughout every aspect of the development. Open Gate would enable us to grow the interests of our current cohort and alumni in production, facilities management, administration and fundraising naturally and practically – opening additional career opportunities.

The partnership with Brookfield Properties, and the advantage of being adjacent to the new tower and their other properties, bring us a new community to connect to potential audiences and supporters. The access to generate programming and communications with Brookfield's Activated programme connecting us with over 7000 users will help to grow our profile. We welcome the potential to develop volunteer timebanks and new initiatives to integrate with the fabric of the office workers and open more opportunities to our young people.

From the senior leadership of Dan Scanlon and his team, Brookfield Properties have attended a number of our performances and talkbacks, as well as a funding event at C. Hoare & Co bank and held workshops with our Trustees and senior leadership team. The Brookfield Properties Team and cultural advisor have been transparent and supportive, and we have begun the discussions regarding the development of a long-term partnership to ensure success for all.

We hope that you will consider the significance of having an Open Gate at the heart of the City of London and the impact it will have for Intermission Youth and similar voices to share their creativity – breaking down the barriers of welcome, affordability and access to great, emerging creativity. We have been looking for years now; this cultural centre is just what Intermission Youth needs.

Yours sincerely



Alexander Hoare
Chair of the Board of Trustees
Intermission Youth

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA
Address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amy Williams

Customer Details

Name: Mr GEORGE HAYWARD
Address: [redacted], Wickhambreaux Canterbury

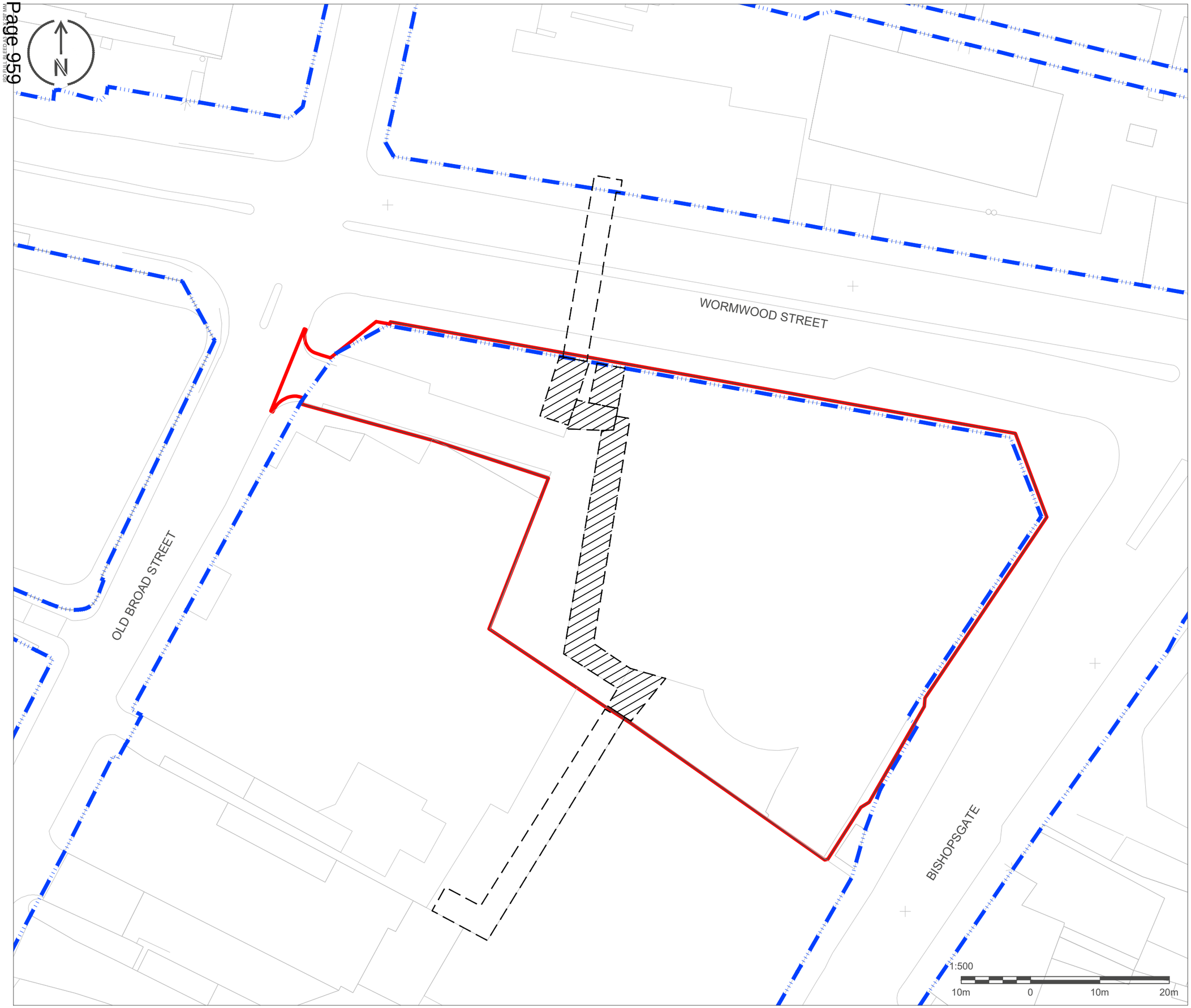
Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I write to strongly object to the effect that this development will have on the historic building opposite at St Ethelburga's. AT 53 storeys this development will dwarf those opposite and around it but in particular St Ethelburga's, a building which I have visited and indeed attended a marriage ceromony there. It is a place of tranquility and light that will hugely affect it.

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IF NOT BLEEDED AT 297 MM



NOTES

1. Do not scale from this drawing. If in doubt refer to the Project Manager for clarification.
2. This drawing is based on topographical survey 18579-TOPO-2D, revision A, dated 12/07/23.
3. The proposed site boundary is taken from RSHP drawing RSHP-P-0002-P-00, revision A, dated 10/05/24.
4. Highway boundary information is indicative only and has been transposed based on interactive mapping available from the City of London.
5. It is assumed that the topographical survey, OS basemapping, site boundary plan and other boundaries are correctly coordinated to the Ordnance Survey datum. Momentum is not responsible for misalignment between plans.
6. Any indication of site boundaries is to be considered diagrammatic. This drawing is based on layouts prepared by others and our details are not in themselves intended to be any definition of land ownership.

KEY

- Existing City Walkway Boundary
- Existing CoL Highway Boundary
- Planning Application Boundary
- Proposed area of city walkway to be stopped up (275.76m^2)

REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY
B	02/09/24	KEY REVISED	FR	BH	DHG
A	27/08/24	FIRST ISSUE	FR	BH	DHG

momentum transport consultancy

CLIENT: Brookfield

JOB TITLE: 99 BISHOPSGATE

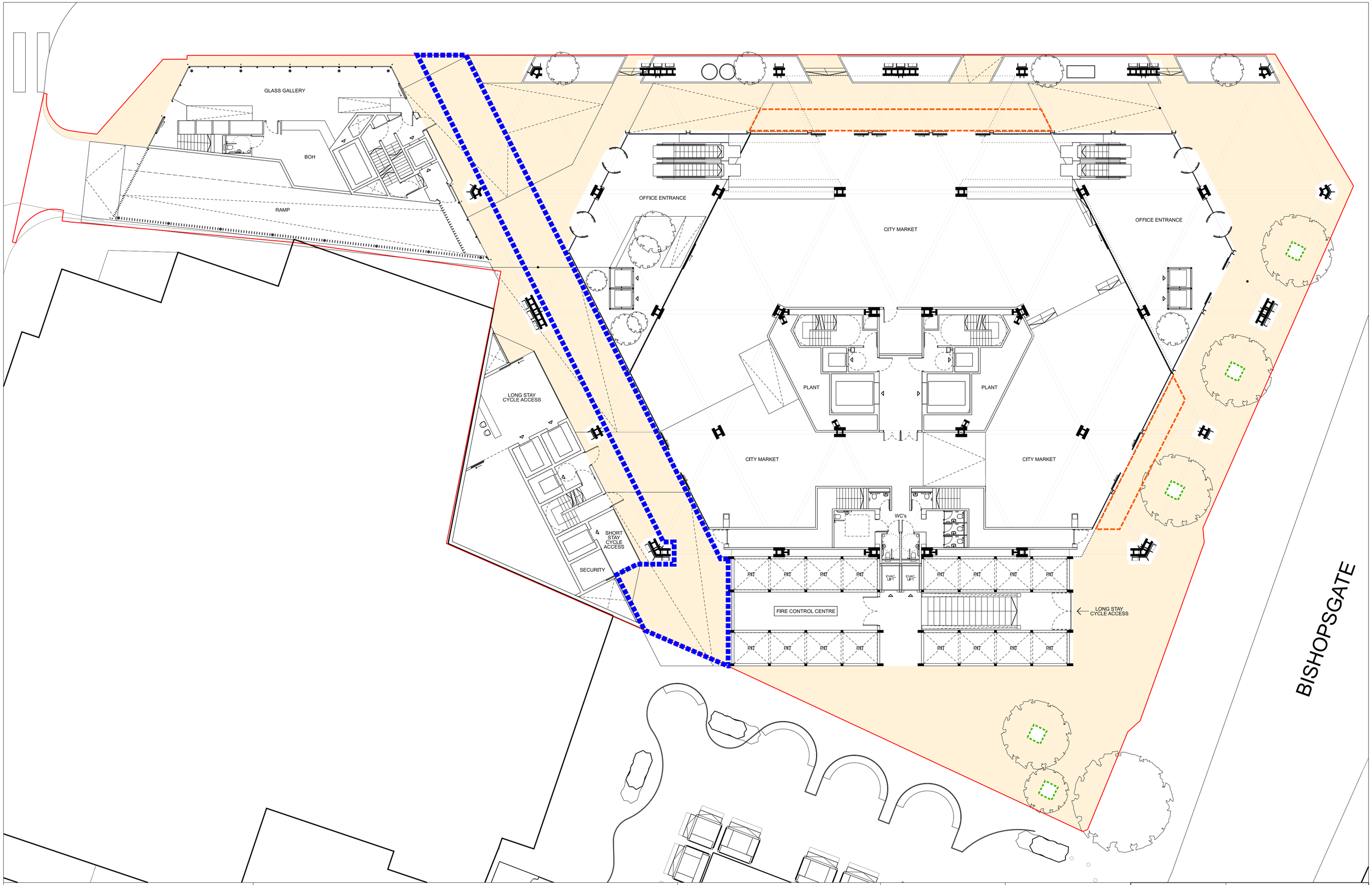
DRAWING TITLE: PROPOSED STOPPING UP PLAN

STATUS: FOR INFORMATION

DRAWING NO:	REV:	SCALE AT A3:
M001211-2-1-DR-002	B	1:500

The way the world moves. By design.

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Revision	Date	Description
A	17.12.2024	General updates
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-

Legend

- Open space 1,381m2 (14,865sq.ft)
- Proposed permissive path from Wormwood Street to 55 Bishopsgate Site
- 1200mm tree grill as defined by Andy Sturgeon
- Space for informal external seating

N

0 5 10m

Drawing Purpose: SKETCH

Drawn by	Checked by	Authorised by
RSHP	RSHP	RSHP

Do not scale from drawing. The author of this drawing takes no responsibility for any dimensions obtained by measuring or scaling from this drawing and no reliance may be placed on such dimensions. If no dimension is given, it is the responsibility of the recipient to ascertain the dimension specifically from the author or by site measurement. The sizing of all structural and service elements must always be checked against the relevant engineer's drawings. No reliance should be placed upon sizing information shown on this drawing. All internal layouts including plant / BMU are illustrative only.

Client: 99 Bishopsgate Real Estate SARL

Brookfield Properties

Project: 99 Bishopsgate

Contact: The Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AB, 020 7385 1235, enquiries@rshp.com, rshp.com

RSHP

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Drawing Title: Proposed Open Space L00 General Arrangement Proposed

Drawing Number	Revision
RSHP-13015-SK-0821	A

Scale @ A2	Drawing Date	Revision Date
1:200	11.12.2024	17.12.2024

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IF NOT FULL SHEET AS SHOWN THIS DRAWING IS SCALED TO 297 MM

Page 963



NOTES

1. Do not scale from this drawing. If in doubt refer to the Project Manager for clarification.
2. This drawing is based on OS mapping.
3. The proposed site boundary is taken from RSHP drawing RSHP-P-0002-P-00, revision A, dated 10/05/24.
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6. Any indication of site boundaries is to be considered diagrammatic. This drawing is based on layouts prepared by others and our details are not in themselves intended to be any definition of land ownership.

KEY

- Existing CoL Highway Boundary
- Existing TfL Highway Boundary
- Planning Application Boundary
- CoL Permanent s278 Highway Works Extent

REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY
A	20/12/24	FIRST ISSUE	LT	BH	JT

momentum transport consultancy

CLIENT:

Brookfield

JOB TITLE:

99 BISHOPSGATE

DRAWING TITLE:

OUTLINE DRAWING
COL PERMANENT S278
HIGHWAY WORKS EXTENT

STATUS:

FOR INFORMATION

DRAWING NO:	REV:	SCALE AT A3:
M001211-2-1-DR-003	A	1:500

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