Public Document Pack

Planning Applications Sub-Committee

Date: **WEDNESDAY, 28 MAY 2025**

Time: 10.30 am

Venue: **LIVERY HALL - GUILDHALL**

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin
Samapti Bagchi
Matthew Bell
Deputy Emily Benn
Deputy John Edwards
Anthony David Fitzpatrick
Deputy Marianne Fredericks
Deputy Madush Gupta
Josephine Hayes
Deputy Jaspreet Hodgson
Amy Horscroft
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Timothy James McNally
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Deborah Oliver
Deputy Henry Pollard
Alderman Simon Pryke
Deputy Nighat Qureishi
Robertshaw
Hugh Selka
Naresh Hari Sonpar
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Matthew Waters
Jacqui Webster

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

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

1. **APOLOGIES**

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

3. **1 OLD JEWRY LONDON EC2R 8DN**

   Report of the Director of Planning & Development.

   For Decision
   (Pages 5 - 244)

4. **55 FLEET STREET, EC4Y 1JU**

   Report of the Director of Planning & Development.

   For Decision
   (Pages 245 - 374)

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

   Report of the Director of Planning & Development.

   For Information

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

   Report of the Director of Planning & Development.

   For Information

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

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

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Environment Department

Committee:	**Date:**
Planning Application Sub-Committee	28 May 2025
1 Old Jewry London EC2R 8DN The change of use of part the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revised access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.	**Public**
Ward: Walbrook	**For Decision**
Registered No: 24/00226/FULL	**Registered on:** 01 March 2024
Conservation Area: Bank	**Listed Building:** No

Summary

Site and Surroundings

1 Old Jewry is a nine-storey building located adjacent within the Bank Conservation Area and adjacent to the Guildhall Conservation Area. The building is bounded by Old Jewry to the west, Poultry to the south, Grocers' Hall Court to the east and the adjacent building 8-10 Old Jewry to the north. The building is primarily used for office accommodation, with retail units on the ground and basement levels. The site benefits from excellent public transport connections and is situated within a historic townscape. It is noted that the ground floor along Poultry and Old Jewry has narrow openings, reducing activation along primary retail routes. The Poultry shopfront of the site falls within Cheapside Principal Shopping Centre (PSC).

Proposal

The current application seeks to improve the existing office accommodation by extending the office lobby internally and adding amenity areas to the roof level by way of a pavilion extension and the creation of a new roof terrace for the use of the office staff. Alterations to the shopfronts and the prime office elevation at Old Jewry are proposed to create better activation of the building on the streetscape and improve the marketability and presence of the retail units. The existing building above ground floor would be retained, with only minor internal refurbishment works.

Consultation and Background information

The planning application for 1 Old Jewry was initially made valid on 13th March 2024, with site notices displayed on 21st March 2024 and letters sent to nearby properties. No third-party representations were received during this consultation period. Following consultation, the application was deemed to meet relevant policies and was recommended for approval. A Decision Notice was issued on 15th July 2024.

Following the issue of the Decision Notice a judicial review was filed by an adjoining occupier of the former Midland Bank headquarters building ("the Ned Hotel") on 22nd August 2024, challenging the planning permission on a number of grounds including the failure to advertise the application in a local newspaper. The City Corporation and the applicant agreed to the quashing of the permission based on this procedural issue, and a Consent Order was sealed by the Court on 4th December 2024. As a result, the decision was quashed and the application reverts to the City Corporation for reassessment and determination.

The consultation period for the reopened application began on 13th December 2024. Site notices were displayed on 20th December 2024, and a press advertisement was published on 7th January 2025. Letters were sent to 9 nearby addresses, including residential and commercial occupiers (including the claimant in the proceedings).

A total of 11 objections were received during that consultation period which is the reason the planning application now comes before the Planning Applications Sub-Committee for determination.

In response to objections regarding amenity impacts on the hotel neighbours to the east of the site, the applicant made minor amendments to the design to include increased screening at roof level and to limit access to the eastern side of the proposed new roof terrace, protecting the privacy of the neighbouring roof terrace. Updated plans and a Written Scheme of Investigations (WSI) were submitted in March 2025.

A re-consultation took place on 18th March 2025, with site notices displayed on 22nd March 2025, and replaced with new notices on 4th April 2025, and a press advertisement published on 25th March 2025. Letters were also sent to all neighbours consulted in December 2024, on 20th March 2025 including consultation letters to the contributors sent on 17th April 2025.

2 public representations were made following the March 2025 re-consultation, objecting to the proposed development.

Assessment and Policy Context

The assessment of the proposed development considers the London Plan 2021, the City of London Local Plan 2015, and the emerging City Plan 2040, with the latter holding limited weight as it progresses towards adoption. Government guidance from the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) is also taken into account.

Principle of development

The site is located within the Central Activities Zone (CAZ), where office development is a priority. The proposal includes improvements to office accommodation, with the addition of office floor space at roof, ground and basement levels. This increase in office space aligns with policies aimed at supporting employment and office growth within the CAZ, in compliance with the London Plan and the City of London Local Plan.

The proposed development involves the loss of some retail space protected by existing conditions to the ground level. This loss equals to 157sqm as such would represent a loss of floorspace within the Cheapside Principal Shopping Centre (PSC) contrary to Policy DM20.1 of the Local Plan 2015 and emerging policy RE1. However, it is considered that the proposal would retain a significant amount of active retail frontage to the PSC and makes improvements to the shopfront, addressing existing issues with visibility and vacancy. The limited reduction in retail space is considered acceptable and does not compromise the function of the Cheapside Principal Shopping Centre (PSC), in line with relevant policies on retail provision.

Similarly, the condition secured within the original consent requiring the ground floor element to remain as retail is subsequently proposed under this application to ensure the continuation of the PSC as detailed above.

Furthermore, the loss of retail floor space for enhanced office space would align with the Strategic Policy CS1 (Office) which seeks to maintain the City's position as one of the world's leading financial and business centres.

Design, Heritage, and Accessibility

The proposals for an opened-up ground floor frontage on Poultry and Old Jewry would improve the pedestrian experience, enhance visual permeability, and align with the architectural symmetry of the façade. The proposed pavilion is well designed with limited visibility from surrounding streets and is a scale and materiality subservient to the main structure. The new roof terrace would be accessible to all office users and the ground floor office and cycle entrances and would be updated and relocated in terms of the latter to increase inclusivity of the building.

The proposed development creates minimal visual change to the public realm and enhances the building's functionality, accessibility, and energy efficiency. The façade changes are modest and the pavilion roof extension and plant location, scale, design detail and materiality would not harm the character and appearance of the Bank Conservation Area or the settings of other nearby designated heritage assets. It is considered acceptable and complies with relevant design, heritage, and accessibility national and local policies and guidance.

Archaeology

An Archaeological Desk-Based Assessment has been submitted, identifying only minor below-ground impacts from a new lift pit and drainage. The applicant's additional submission of documents in March 2025 included a Written Scheme of Investigations (WSI) which was reviewed by the Greater London Archaeological Advisory Service (GLAAS). GLAAS raised no objection to the proposals and recommended a compliance archaeological condition.

Transportation and Highways

The proposed development seeks to improve and increase the office accommodation provided on site, and enhances cycling infrastructure, relocating the bike entrance and adding 77 cycle parking spaces (including 2 accessible). Amendments have been made to comply with the London Cycle Design Standards (LCDS), including replacing vertical cycle spaces with more practical options. Servicing arrangements will remain unchanged, with a Delivery and Servicing Management Plan will be secured by condition. The site will be served by existing blue badge bays in the area, Travel Plans will monitor on-street disabled parking demand and promote public transport use. A Construction Logistics Plan will also be secured by condition. Overall, the proposals are considered acceptable in transport terms, subject to the recommended planning conditions.

Waste and Refuse

The City's Cleansing team has reviewed the proposed waste facilities and confirmed that they meet the necessary requirements. The proposed waste facilities and collection arrangements are considered acceptable.

Sustainability

As a minor development, the scheme is not required to meet London Plan Policy SI2 or the City of London's Carbon Options Guidance, but it adopts similar energy efficiency principles. Existing glass will be replaced with more energy-efficient materials, such as stone spandrels and openable double-glazed windows. The office element targets an 'Outstanding' BREEAM rating with a target score of 89.1%, although no formal post-completion certificate is required. The development will enhance ecological value through features like a green roof garden and wildlife habitats, achieving a 105% increase in ecological value. While the application does not trigger the Biodiversity Net Gain (BNG) requirements, the proposal maximizes greening opportunities. The development also reduces carbon emissions through material reuse, renewable energy measures, and sustainable landscaping, contributing to sustainability and climate resilience.

Amenity – Overlooking

Policy DM21.3 of the adopted Local Plan 2015 and emerging Policy HS3 of the emerging City Plan 2040 respectively require all developments to be designed to avoid or minimise overlooking and to seek to protect the privacy of the adjacent residential accommodation, although it is acknowledged that some overlooking is unavoidable in dense urban areas. The development includes a roof terrace and a roof pavilion structure, but it is noted there are no immediate residential properties. The immediate hotel neighbour at 27 Poultry and the club members using the hotel's roof terrace, objected to the application due to increased levels of overlooking and loss of their privacy from the proposed development. It is noted that hotels/private members clubs, which serve transient guests and members, have different privacy expectations from residential properties. The proposed development does not result in unacceptable overlooking of nearby residential properties, in line with Policies DM10.3 and DM21.3. The applicant made some minor adjustments to their roof design in order to reduce overlooking towards the east side of the proposed terrace as a response to these objections and this is welcomed and overall will result in an acceptable relationship between the two properties.

Amenity – Daylight and Sunlight

The proposed development, located in a predominantly commercial area, is not expected to have a significant impact on daylight or sunlight. The applicant submitted a Daylight and Sunlight Report which assesses the windows facing the application site and the roof terrace of the neighbouring hotel to the east of the site (the Ned). Given the site's commercial context and the low existing daylight levels at the adjacent Ned

Hotel, the impact is minimal. The assessment found only minor reductions in daylight to a few windows, which are typical in urban environments. There are no significant reductions in sunlight to the hotel, and the overshadowing assessment confirms no impact on external spaces. In context, these impacts are acceptable. The proposal complies with the relevant policies regarding daylight and sunlight impacts.

Amenity – Noise and Disturbance

Noise from the roof terrace and plant room will be controlled through conditions, including limited hours, no amplified music, and no events. CoL Environmental Health has raised no objections, ensuring the development complies with relevant policies.

Air Quality

The development meets Local Plan Policy CS15 and City Plan 2040 policies DE1 and HL2, addressing air quality and achieving air quality neutrality. After a revised Air Quality Assessment, CoL Environmental Health raised no objections, subject to conditions.

Community Engagement

An Engagement Statement was submitted by the applicant detailing discussions with neighbouring occupiers. Statutory consultation requirements and relevant City Corporation guidance was met, allowing stakeholders to engage with the proposal.

Suicide Prevention

The proposal includes railings on the terrace to reduce suicide risk, in line with Local Plan Policy CS3 and the City's Planning Advice Note. Full details will be secured by condition.

Conclusion

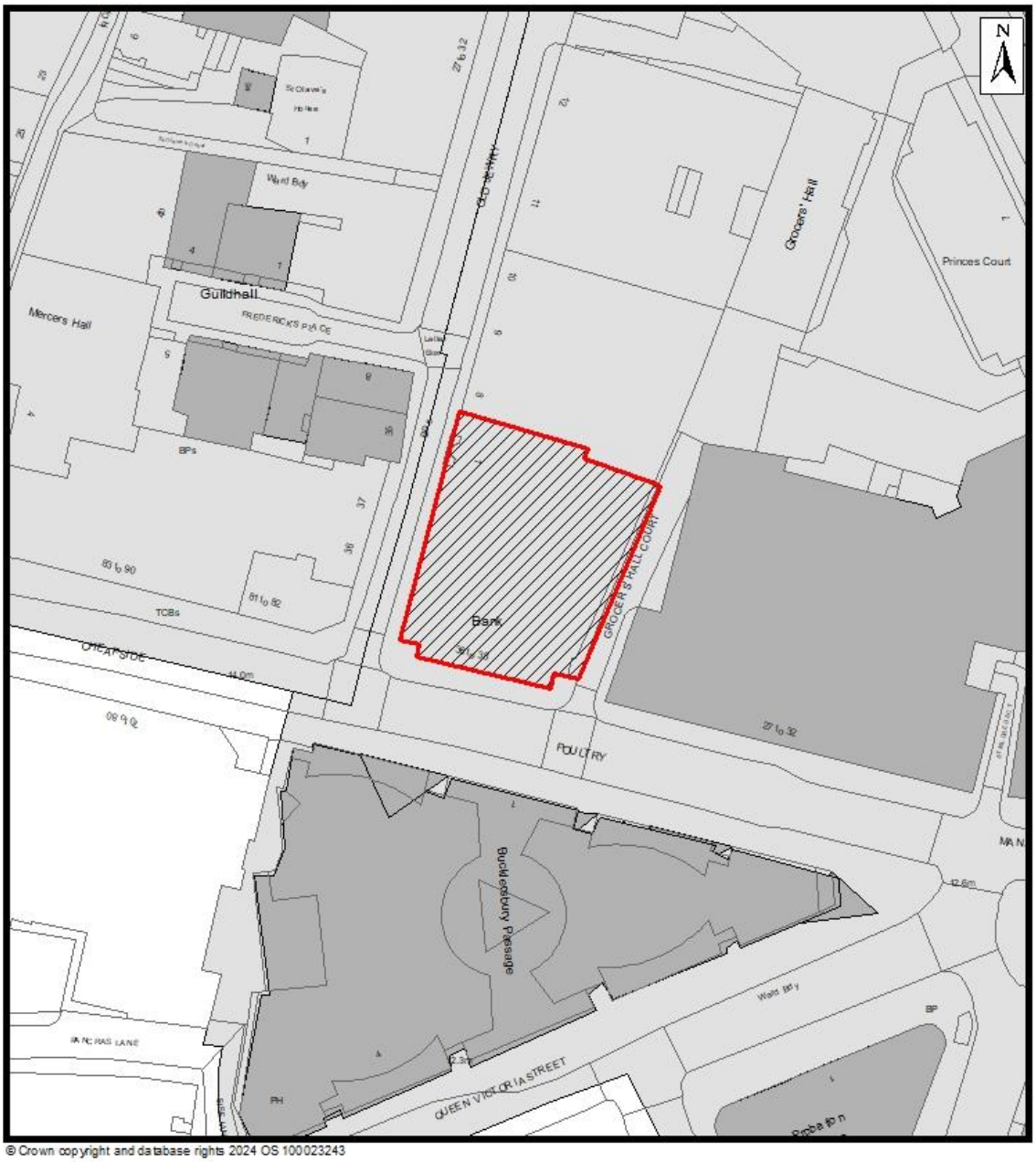
Despite the loss of retail, the development is considered to comply with the development plan taken as a whole, and other material considerations including the NPPF and emerging City Plan 2040 also support the grant of the permission in this instance. Accordingly, the proposals are recommended for approval subject to the imposition of conditions.

Recommendation

(1) <u>That Planning Permission be granted for the above proposal in accordance with the details set out in the attached schedule.</u>

Site Location Plan

Site Location Plan



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ADDRESS:
1 Old Jewry

CASE No.
24/00226/FULL

SITE LOCATION
LISTED BUILDINGS
CONSERVATION AREA BOUNDARY
CITY OF LONDON BOUNDARY

CITY OF LONDON
ENVIRONMENT DEPARTMENT

Site Photos

Site shown to the centre – photo location on Cheapside, facing east



Poultry shopfronts – Ground floor south elevation



Old Jewry street frontage – west elevation



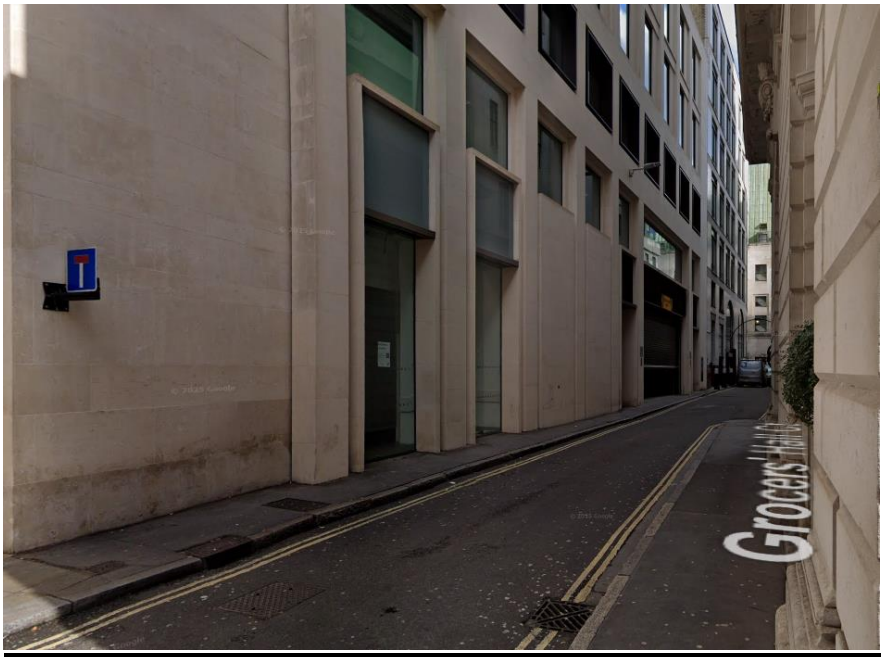
Fenestration – south elevation



Office entrance 1 Old Jewry



Grocers' Hall Court (east elevation) – vehicle and bike entrance



Proposed Ground floor alterations – shopfronts (Poultry)



Proposed Ground floor alterations – office&bike entrance (Old Jewry)



Fact Sheet

TOPIC	INFORMATION				
1. HEIGHT	EXISTING			PROPOSED	
	49.66m AOD			57.45m AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING (sqm) (GIA)		PROPOSED (sqm) (GIA)	
	Class E (Office)	8,057		9,078	
	Class E (Retail)	993		463	
		TOTAL	**9,050**	**TOTAL**	**9,541**
				TOTAL UPLIFT	**491**
3. OFFICE PROVISION IN THE CAZ	Existing: 8,057 sq. m Proposed: 9,078 sq. m Office uplift: +1,021 sq. m (including through loss of existing retail)				
4. EMPLOYMENT NUMBERS (Operational Phase)	EXISTING			PROPOSED	
	Estimated to be Circa 550 – building currently vacant due to standard of facilities.			Circa. 662	
5. VEHICLE/ CYCLE PARKING		EXISTING		PROPOSED	
	Car	0		0	
	Cycle	45		77	
	Lockers	42		116	
	Showers	2		9	
	Changing facilities	0		2	
6. HIGHWAY LOSS / GAIN	No loss or gain of highway proposed				
7. PUBLIC REALM	N/A				

8. TREES	EXISTING	PROPOSED
	0	0
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	A Delivery and Servicing Management Plan will be secured through a planning condition.	
10. SERVICING HOURS	No servicing between: - 23:00 - 07:00 Monday to Saturday; and - 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays	
11. RETAINED FABRIC	100% of the existing substructure. Minimum 95% of the existing superstructure.	
12. OPERATIONAL CARBON EMISSION SAVINGS	45% improvement over GLA baseline carbon emissions (provided for information purposes as application is a minor development scheme and no formal requirement to assess)	
13. OPERATIONAL CARBON EMISSIONS	N/A	
14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS	
	N/A	
15. WHOLE LIFE-CYCLE CARBON EMISSIONS	N/A	
16. WHOLE LIFE-CYCLE CARBON OPTIONS	CARBON OPTIONS RESULTS	
	N/A	

17. TARGET BREEAM RATING	Targeting an “Outstanding” BREEAM rating. Targeting a 5* NABERS UK rating.
18. URBAN GREENING FACTOR	0.09
19. AIR QUALITY	Air Quality Neutral
20. BIODIVERSITY NET GAIN	N/A

Main Report

Site and Surroundings

1. 1 Old Jewry is an existing 9 storey building with basement levels. It is bounded by Old Jewry to the west, Poultry to the south, Grocer's Hall Court to the east and the adjoining building at 8-10 Old Jewry to the north. The building at part ground and basement and the all the upper levels is existing office accommodation. Along Poultry at part ground and basement levels is a parade of three retail units falling within Cheapside Principal Shopping Centre (PSC).

2. 1 Old Jewry is located at the junction of Old Jewry and Cheapside/Poultry and is located on the edge of the Bank Conservation Area and adjacent to the Guildhall Conservation Area. The primary frontage of the existing building fronts Poultry and sits as a modern insertion to this historic street formed of large city blocks clad in Portland Stone. The townscape context of the locality is of a modest scale with the primary frontage to Cheapside/Poultry and narrow streets running north south. Overall, the existing building sits comfortably within the built context in terms of scale, massing, materiality and appearance however the ground floor fronting Cheapside and Old Jewry is less successful due the narrow deep openings reducing the level of activation along primary retail routes.

3. The site is not located within St Paul's Heights Policy Grid Area or within the Background Wider Background Setting Consultation Area of London Views Management Framework (LVMF).

4. The application site has a PTAL of 6b meaning is highly accessible by public transport. Poultry and Cheapside are a Strategic Cycle Route with a contra flow cycle lane running along Old Jewry.

Background Information

5. A planning application (Ref. No. 24/00226/FULL) was submitted for the application site in March 2024 for the following development:

   "The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace."

6. The application was made valid on 13th of March 2024 and following that site notices were displayed on 21st March 2024 and letters were sent to nearby residential properties.

7. No representations were made during the consultation period.

8. The statutory and internal consultees that responded are mentioned in the consultation section further below.

9. Following consultation, an assessment of the material planning considerations was made on the following key planning areas:

- Principle of development
- Design and Accessibility
- Heritage
- Archaeology
- Transport and Highways
- Waste
- Sustainability
- Amenity matters (overlooking, daylight sunlight, noise and disturbance)
- Air quality
- Suicide prevention
- Section 106 and CIL officers

10. Officers assessed the proposals against the NPPF, the development plan and other relevant policies and guidance including SPDs and SPGs, and the emerging City Plan 2040.

11. In response to officers feedback some minor updates were made to the proposals over the course of the application to the satisfaction of Planning Officers. Officers concluded that the proposed development would provide improved office floor space in the City with high-quality amenity areas, much needed for modern office tenants' demands. The proposals were found to be acceptable and in compliance with the policies of the development plan, subject to recommendations for the imposition of planning conditions. The planning application was therefore recommended for approval and subsequently a Decision Notice approving the proposed development was issued to the applicant on 15th July 2024.

12. Following the resolution of the planning application, a claim for judicial review was filed in the Planning Court by an adjoining occupier (the Claimant) seeking to challenge the decision issued on 15/07/2024 by the City of London Corporation granting planning permission for the development. The claim was submitted on 22nd August 2024 by the claimants for judicial review on five grounds (one ground was split into two sub-grounds). The parties (the LPA and the Claimant) agreed that the claim should be allowed by consent and the

Permission was quashed on the basis of the first of these grounds only. The first ground in question related to the original failure of the Local Planning Authority to publish a notice advertising the planning application in a local newspaper circulating in the locality of the application site pursuant to regulation 5A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990.

13. In respect of the remaining grounds, neither the LPA nor the Claimant made any concession. These grounds were:

- That there had been a breach of legitimate expectation set out in the City's Statement of Community Involvement and/or Engagement Guidance that neighbouring owners would be consulted at the pre-application stage and/or after the application had been submitted;
- That there had been a breach of legitimate expectation contained in the City's Statement of Community Involvement that it would advertise the application in the press;
- That there had been a failure to take into account the lack of engagement with the Claimants and/or the failure to take into account the lack of a submission of a statement of community engagement by the applicant;
- That there had been a failure to take into account the visual impact of the proposed roof extension on daylight/sunlight onto the Hotel's users and/or misinterpretation of local plan policies; and
- That there had been a failure to take into account the impact of overlooking from the proposed roof terrace.

14. The matters raised on the above grounds have been addressed in this report. Please be referred to sections Consultation, Community Engagement, Amenity Daylight Sunlight, and Amenity Overlooking.

15. On that basis, the Consent Order sealed by the Court on 4th December 2024 which allowed the claim for judicial review of the planning permission (application ref. 24/00226/FULL) and quashed the permission issued on 15th July 2024. The planning application (ref. 24/00226/FULL) therefore reverts to the City Corporation as a live application for redetermination. Relevant details about the subsequent consultation period are mentioned below under the consultation section.

Planning History

16. On 26th October 2004, planning application Ref. No. 3822BY granted the "Redevelopment for offices, retail and wine bar uses including the removal of Dove Court".

17. On 12th May 2005, planning application Ref. No. 05/00182/FULL amended the above consent and granted the "Erection of an office building with A1 and A3/A4 uses at ground and basement levels". This consent has been implemented.

18. Condition 5 of the 05/00182/FULL permission read as follows:

> *"5. Except as may be approved under condition 6 the area marked "retail (A1 only)" on the ground floor plan hereby approved shall only be used for purposes falling within Class A1 of the Town and Country Planning (Use Classes) Order 1987.*
>
> *REASON: To ensure that retail facilities are provided in accordance with the following policy of the Unitary Development Plan 2002: SHOP5."*

19. The whole ground floor retail area is marked as in shop use (A1) on the approved plans under planning permission 05/00182/FULL.

20. On 18th October 2018, planning application Ref. No. 18/00885/FULL granted permission for "Alterations to existing shopfront, consisting of the relocation of the existing entrance doors and the installation of a new glazing panel".

Proposal

21. The current application seeks to change the use of the part of the existing protected retail area at ground level and reconfigure the basement and ground floors in order to create additional office floorspace, alongside to alterations to the ground floor elevations and shopfronts, replacements of all existing windows and the erection of a two-storey pavilion building at roof level, including plantroom, with access to a private new roof terrace for the use of the office staff. The existing building above ground floor would be retained, including the existing stone elevations, with only minor internal refurbishment works.

Consultation

22. As previously mentioned, the application was originally validated on 13th of March 2024 and following that site notices were displayed on 21st March 2024 and letters were sent to nearby residential properties.

23. No third-party/neighbouring representations were made during this consultation period.

24. The statutory and internal consultees responded are mentioned further below.

25. As part of the consultation and assessment of this application, Officers visited the roof terraces of 1 and 27 Poultry on the 24th April 2024. Access to both terraces were limited, however Officers successfully entered both outdoor areas. Regarding the roof terrace at 27 Poultry, this is used as a private members club in connection with the Hotel and access was achieved through a private member accompanying Officers during their visit at the roof terrace

(including the restaurant/seating area, outdoor space and the swimming pool). Officers advised the staff and the member accompanying them of the proposed development and the reasons of their visit.

26. Following the court's order on 4th December 2024 which quashed the permission dated 15th July 2024, the planning application went live again on Friday 13th December 2024. The application includes the same series of documents submitted for the July determination with the addition of four documents. These include:

- Overshadowing Assessment, prepared by Point 2, 18 October 2024;
- Daylight Sunlight Report, prepared by Point 2, October 2024;
- Addendum Letter, prepared by Savills, 5 December 2024; and
- Engagement Statement, prepared by Savills, received on 13 December 2024.

27. The subsequent consultation period for the proposed development commenced on 13th December 2024. The statutory consultation period of 21 days was extended by 1 week given the consequent holiday season. The proposed development has been advertised on site on 20 December 2024 with site notices attached along the perimeter of the building in visible locations from the public highway. In total three site notices were displayed on the building in locations on the surrounding public highways of Grocer's Hall Court, Poultry and Old Jewry. A press advertisement was also printed on 7th January 2025 in a local newspaper (City AM) circulating in the locality of 1 Old Jewry, notifying the readers of the proposed development and the 21-day period of the consultation. Letters were also printed on 13th December 2024 and sent to residential and commercial occupiers in the immediate surroundings of the application site.

28. The Engagement Statement submitted by Savills has been prepared to provide a summary of the applicant's engagement during the application process. It advises that since the legal challenge to the permission the applicant has engaged with the claimant in an effort to work positively having due regard to the requirements of the planning application process. In line with this statement, three meetings were held during the months of August, September and November where the applicant provided the additional evidence to demonstrate the proposed development would not raise unacceptable impacts on surrounding buildings.

29. In response to the December consultation, on 14th March 2025 the applicant provided additional information to accompany the application, including:

- Updated Application and CIL forms which rectified an error in the proposed floor areas;

- A letter from Savills providing responses to matters raised by objectors;
- A set of updated plans:
    - Drawing No: 6982-SRA-XX-09-DR-A-02209 Rev P02 – Proposed Ninth Floor Plan;
    - Drawing No: 6982-SRA-XX-EE-DR-A-02401 Rev P02 – Proposed East Elevation;
    - Drawing No: 6982-SRA-XX-ES-DR-A-02402 Rev P02 – Proposed South Elevation;
    - Drawing No: 6982-SRA-XX-EW-DR-A-02403 Rev P02 – Proposed West Elevation;
- A privacy screening design report; and
- A Written Scheme of Investigations (WSI).

30. The design response is discussed in more detail in the following paragraphs.

31. A re-consultation on the additional information commenced on 18th March 2025. As in the previous consultation, site notices were displayed around the perimeter of the building on 22nd March 2025, which were replaced with updated notices on 4th April 2025 to correct an error to the date the public notice was published, and a press advertisement was published on 25th March 2025. Letters were also sent to neighbouring residential and commercial occupiers on 20th March 2025, including consultation letters to the contributors sent on 17th April 2025.

32. For completeness a list of the addresses consulted is provided as follows:

- 1 Poultry London EC2R 8EJ
- 2 Poultry London EC2R 8EJ
- 3 Poultry London EC2R 8EJ
- 35 Old Jewry London EC2R 8DD
- 36 - 37 Old Jewry London EC2R 8DD
- 8 - 10 Old Jewry London EC2R 8DN
- 6 Frederick's Place London EC2R 8AB
- Grocers Hall Prince's Street London EC2R 8AQ
- 8 Frederick's Place London EC2R 8AB
- 81 - 82 Cheapside London EC2V 6EB
- The Ned Hotel 27 Poultry London EC2R 8AJ

33. For clarity a timeline of the consultation process is provided below with the associated relevant timeframes:

Consultation Type	Recipients	Date Sent/Displayed (21 days unless stated)
Original Consultation – Consultees (email)	Relevant external/Internal Consultees	18/03/2024
Original Consultation – Neighbours (letter)	Neighbouring residential properties (only)	20/03/2024
Original Site Notice	N/A	21/03/2024
Consent Order on 4th December and application reverts for reassessment.		
Consultation – Consultees (email)	Relevant external/Internal Consultees	13/12/2024
Consultation – Neighbours (letter)	As per original with addition of all neighbouring landowners (including commercial)	13/12/2024 (28 days due to winter holidays)
Site Notice	N/A	20/12/2024
Press Notice	N/A	07/01/2025
Amended Plans received 14th March 2025		
Consultation – Consultees (email)	Relevant external/Internal Consultees	18/03/2025
Consultation – Neighbours (letter)	As per original with addition of all neighbouring landowners (including commercial)	21/03/2025
Site Notice	N/A	22/03/2025
Amended Site Notice – to reflect appropriate dates	N/A	04/04/2025 (replacing the above and creating a new 21 day)
Press Notice	N/A	25/03/2025
Consultation – Neighbours (letter and email)	Neighbouring landowners with addition of previous objectors.	17/04/2025 (26 days to allow for extra Bank Holiday days).

Statutory and Internal Consultees

34. The statutory and internal consultees consulted for the proposed development over the course of all consultations, including consultee responses from the March 2024 submission, and subsequent December 2024 and March 2025 re-consultations are shown in the table below.

Consultee	Summary of comments
Internal	
Cleansing Services	**Email dated 11/06/2024 and 14/12/2024**: The proposed waste and storage collection facilities indicated in Drawings No. 6982-SRA-XX-B1- DR-A-02199 Rev P02 and 6982-SRA-XX-00-DR-A-20100 Rev P06 and as outlined in the Design and Assessment, Feb 23, are adequate for this proposal. Therefore, this division will not raise any objection to this application. Please note, waste store to comply with BS5906 specifications, i.e. FD30 rated, etc., and all occupants of the development must have access and be required to use the waste storage and collection facilities. **Officer response**: Noted, the relevant plans have been listed in a recommended condition (approved plans) and a compliance condition has been recommended.
Environmental Health	**Memos dated 03/04/2024, 18/12/2024 and 21/03/2025:** No objection subject to conditions. **Officer response**: Conditions are recommended.
Air Quality	**Memo dated 10/04/2024:** No objection subject to condition. **Officer response:** Condition is recommended.
Transport and Highways	**Memo dated 12/07/2024:** No objection subject to conditions. **Officer response**: Conditions are recommended
Energy and Sustainability	**Letter dated on 21/06/2024**: No objection. **Officer response**: Noted.
Access Advisor	**Email dated 11/06/2024:** No objection. **Officer response**: Noted.
Lead Local Flood Authority (LLFA)	**Memo dated 27/03/2024:** Did not wish to be consulted. **Officer response**: Noted.
Planning Obligations	**Letter dated 07/06/2024 and 09/01/2025:** No objection, recommended informative.

	Officer response: Informative is recommended.
Conservation Area Advisory Committee (CAAC)	**Letter dated 10/04/2024:** The Committee had no objection to the proposed ground floor alterations, but expressed concerns about the proposed timber cladding and requested further detail on the strategic views, specifically in relation to the pavilion and plant room. They advised that further detailed information was required prior to commenting on the potential impact of the proposed new pavilion and plant room at roof level on the character and appearance of the Conservation Area. Officers presented the proposed development on a follow-up meeting on the 10th April 2025. CAAC provided the following response. **Letter dated 10/04/25:** The Committee objected to the revised application considering that the proposed balustrade was too far forward and needed to be pulled back from the front elevation in order to reduce the adverse impact on the character and appearance of the Conservation Area. **Officer response**: The comments are noted and are addressed in the Architecture, Urban Design and Public Realm, and Heritage sections of the report.
External	
London Underground	**Email dated on 04/04/2024 and 03/01/2025:** No objection subject to conditions. 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 London Underground tunnels and infrastructure. This site is adjacent to Central Line. It will need to be demonstrated to the satisfaction of LUL engineers that: the proposed redevelopment will not have any detrimental effect on our tunnels and structures either in the short or long term; the design must be such that the loading imposed on our

	tunnels or structures is not increased or removed; we offer no right of support to the development or land. Therefore, we request that the grant of planning permission be subject to conditions. **Officer response**: Conditions are recommended.
Historic England	**Letter dated on 21/03/2024 and 17/12/2024:** Thank you for your email regarding the above application. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions, details of which are attached. **Officer response**: Noted.
Greater London Archaeology Advisory Service (GLAAS)	**Letter dated 11/07/2024**: Assessment of Significance and Impact All of the City of London 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 site was previously partially excavated prior to development works in 2007. Much of the archaeology was preserved in situ beneath the single basement, but some areas were excavated in the locations of new pile pits and service runs. Extensive archaeological remains of Roman and medieval date were recorded, including a Roman road, clay and timber buildings and masonry buildings. An archaeological desk based assessment has been submitted with the planning application (MOLA 2024) which identifies that the only areas of proposed below ground impact from the new development comprise a new lift pit and some drainage. Given that archaeology is known to survive on the site, an archaeological condition is recommended in order to excavate and record remains in the areas of impact. **Letter issued on 25/03/2025:** A Written Scheme of Investigation for Archaeological Excavation and Monitoring and Recording (MOLA 2025) has been submitted with this application, which outlines

	how the archaeological mitigation will be managed on the site. The WSI is acceptable and a compliance condition is now recommended to allow the archaeological work to proceed. 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 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public. Recommendations The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. This 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 condition please let us know their reasons and any alternatives suggested. Without this condition being imposed the application should be refused as it would not comply with NPPF paragraph 218. I envisage that the archaeological fieldwork would comprise the following:

	Watching Brief An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive. 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. **Officer response**: Compliance condition and an informative are recommended.
Thames Water	**Email on 02/04/2024**: Waste Comments 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 . 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. Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer

	should take account of this minimum pressure in the design of the proposed development. Supplementary Comments Thames Water have been unable to determine the drainage strategy for this development, in particular the points of discharge for Foul & Surface Water. Design & Access statement, Section 9.2 (flood risk & drainage) refers to current flood risk and SuDS consideration, however, there is no stated discharge points for refurbishment and net dwelling increase. **Officer response**: Informatives are recommended.

Public representations

35. The public representations made for this application are shown in the following table. The full comments are available for public view on the online City of London website of this application, some comments have been summarised due to their length.

No.	Address	Comment
1	2 Salford Road Balham SW2 4BH 08.01.2025	**Objects** on the following grounds: 1. Impact on Historic Character: The proposed development is not in keeping with the character of the Grade I listed building and other historic buildings nearby. These structures contribute significantly to the architectural heritage and cultural identity of the area. Allowing this development could set a precedent for further projects that might undermine this unique historic fabric. 2. Visual Impact: The introduction of modern construction in this sensitive location could disrupt the aesthetic and historic integrity of the area, detracting from the viewing experience of several iconic buildings. 3. Potential Precedent: Approving this application may encourage similar developments, leading to cumulative impacts that further erode the area's historic charm and architectural cohesion. I urge the planning department to carefully consider the long-term implications of this proposal and prioritise the

		preservation of the area's unique historic and cultural value. **Officer response**: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, and Heritage sections.
2	Flat 28 Dorset House, 14 Mount Pleasant, London, WC1X 0BU 09.01.2025	**Objects** on the following grounds: I am a frequent guest at the Ned hotel, using the roof to facilities. One of the main attractions of the rooftop is the privacy it affords, particularly for users of the swimming pool. The proposed rooftop extension will overlook the Ned hotel's rooftop. I am also concerned about the noise that will be generated from the rooftop extension, as I understand that it will be used for various functions and events. I do not think the design of the proposed development respects the setting of the Ned hotel, a Grade I listed building, which is of exceptional interest as only around 2.5% of listed buildings are Grade 1. The hotel is also in a conservation area. In combination this means that even more important should be given to ensuring that the proposed design of the rooftop extension is appropriate, being so close to a Grade I listed building in a conservation area. The bulk and scale of the proposed development will have a detrimental effect on the conservation area and the setting of the Ned hotel. No consideration has been given to the construction of the development and how constrained the site is. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is used by many commercial operators and by construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period. I am aware that the applicant refers to having met with the owners of the Ned hotel and that they have sought to work positively and proactively with them. I cannot therefore

		understand why the planning application is not different to the previous scheme and takes no account of the overlooking and inappropriate bulk and scale of the rooftop extension. This is a major planning application. The lack of any real engagement by the planning applicant with the public is concerning and I hope that the Planning Committee can consider the matter so that the application is thoroughly debated and discussed. **Officer response**: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage, Consultation and Amenity sections.
3	243 Lauderdale Mansions Lauderdale Road London W91LZ 10.01.2025	**Objects** on the following grounds: As a London resident, City worker, and frequent visitor to the area, including as a member of The Ned private members' club, I am concerned about the potential impact of these works. The notice makes clear that the proposed alterations will affect the setting of listed buildings and the character and appearance of the conservation area. Given the historical and architectural significance of this part of the City of London, any changes must be approached with the utmost care and sensitivity. The scale and nature of the proposed alterations, particularly changes to elevations, appear to be substantial. Such works risk irreparably disrupting the skyline, diminishing the historical integrity of the area, and undermining the distinctive character that makes this part of London so unique. As someone who spends a great deal of time in the area, I can attest to its cultural and historical importance. It is vital that this heritage is preserved for current and future generations. I am also concerned about the practical impact of prolonged construction work, which would undoubtedly impose significant disruption on The Ned and its thousands of members, visitors, and staff.

		For these reasons, I wish to register my objection to the application and request that my concerns be taken into full consideration as part of the planning process. **Officer response**: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage and Amenity sections. Conditions have been recommended to safeguard the amenity of the neighbouring occupiers.
4	16 Barons Court Road, London W14 9DT 11.01.2025	**Objects** on the following grounds: I live and work in London and am in the City most days of the week with work, for my gym to maintain my physical health and socially — particularly as a member of The Ned private members' club — I have significant concerns about the potential effects of the proposed changes. The notice clearly indicates that these works will impact the setting of listed buildings and alter the character of the conservation area. This part of the City of London holds immense historical and architectural value – which does not just impact us as locals but significantly impacts the appeal of London to the global tourist trade and industry for all international visitors who bring with them their investments and tourism income - and any modifications must be handled with exceptional care and sensitivity. The proposed changes, particularly the alterations to the building elevations, seem considerable in scope. Such modifications risk damaging the unique skyline, eroding the historical significance of the area, and compromising the character that makes this part of London distinctive. Having spent substantial time in this area, I can personally vouch for its cultural and historical importance. This particular area is a key representation of how the rest of the world views London and forms a significant identity of the United Kingdom, which is why it is featured in so many Hollywood movies. Preserving this heritage is essential not only for current residents and workers but for future generations as well. Additionally, the prospect of prolonged

		construction is concerning, as it would likely cause significant disruptions to The Ned and its many members, guests, and staff. For these reasons, I strongly oppose the application and urge that my objections be carefully considered during the planning process. **Officer response**: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage and Amenity sections. Conditions have been recommended to safeguard the amenity of the neighbouring occupiers.
5	Anonymous comment – address removed by request 13.01.2025	**Objects** for the following reasons: As a London resident, City worker, and frequent visitor to the area, including as a member of The Ned private members' club, I am concerned about the potential impact of these works. The notice makes clear that the proposed alterations will affect the setting of listed buildings and the character and appearance of the conservation area. Given the historical and architectural significance of this part of the City of London, any changes must be approached with the utmost care and sensitivity. The scale and nature of the proposed alterations, particularly changes to elevations, appear to be substantial. Such works risk irreparably disrupting the skyline, diminishing the historical integrity of the area, and undermining the distinctive character that makes this part of London so unique. As someone who spends a great deal of time in the area, I can attest to its cultural and historical importance. It is vital that this heritage is preserved for current and future generations. I am also concerned about the practical impact of prolonged construction work, which would undoubtedly impose significant disruption on The Ned and its thousands of members, visitors, and staff.

		Officer response: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage, and Amenity sections. Conditions have been recommended to safeguard the amenity of the neighbouring occupiers.
6	5 The Green Richmond TW9 1PL 14.01.2025	A former lead architect on James Stirling Michael Wilford and Associates Ltd Number 1 Poultry has commented on this application stating the following (**neutral comment**): This Application is in many respects very detailed but appears to be missing - a careful and complete site analysis and a clear statement of the project brief as outlined below (see 1 to 4). In my opinion it is only when this information is provided that the Application can be fully assessed. Drawings in context There are only very limited Elevations or Sections in this submission showing the building in the broader context. To fully understand the impact of massing and bulk of the proposals the following should be provided with OD levels of the proposals and its neighbours- - Elevations along Cheapside and Poultry (similar to those submitted in a previous application for the same site Application 05/00182/FUL) - Elevations along Old Jewry including sections of 1 Poultry showing the terraces /restaurant - More expansive Sections through The Ned - Midland Bank across Old Jewry and through neighbouring buildings. Based on the limited information provided the Applicant's drawings show a top of roof level of 54.456m above a Ground Floor FFL – 14.77m. The roof level appears to be considerably higher than all the neighbouring buildings and as such may be considered detrimental to the setting of listed buildings in the conservation area. Site's Neutral Contribution

		The Applicant states in the Heritage and Townscape Assessment that the existing building makes a neutral contribution to the surroundings and does not hold any architectural or historic interest. It is this very neutrality and respect for its neighbours that makes No 1 Old Jewry of architectural interest. The fundamental question is therefore are the new proposals respectful to the surroundings and do they maintain the building's historical carefully designed neutrality? The Applicant describes the rooftop as a "pavilion" rooftop extension with additional plant above and that this has been designed to be sensitive to the surroundings. Does the "pavilion" respect the neutrality of the existing/proposed building? Is the pavilion, plant room and terrace respectful to the neighbouring buildings? These points appears not to have been satisfactorily addressed in this Application. Design & Access – Function of the pavilion and terrace There appears to be no explanation of the function of and access to the rooftop pavilion and terrace. The Applicant states that the terrace provide a flexible space for a variety of users. The drawings do not show a plausible layout - who will have access – only tenants of the building? - how will the pavilion be accessed? - will everyone need to check-in at a reception? - is there any limit on the capacity? - will any food or drink be available if yes how will this be serviced? - will there be a kitchen - bar etc? - although not a planning matter it would be useful to know if a licence will be applied for? Overlooking The Applicant clearly hopes to exploit selected views from the proposed terrace but has failed to provide information on the views from neighbouring terraces towards 1 Old Jewry as requested in Pre-App 02 - 18/12/2023 "*The visual*

		impact from neighbouring accessible terraces should be assessed especially from the adjacent listed buildings, One Poultry and The Ned". **Officer response**: The matters discussed in this comment are addressed in the Architecture, Urban Design and Public Realm, and Heritage sections of the report as well as under the Amenity section which relates to outlook. Officers note that a pre-application advice is a paid service that the Local Planning Authority provides and does not hold any weight in the assessment and decision making of this application. Officers found the application documents sufficient to validate the application upon submission, when additional information was requested, the applicant provided this to the Officers who at the time of this report are satisfied that they have proportionate and satisfactory information to understand and make a proper assessment of the proposals and to draw informed conclusions.
7	Farrer & Co LLP on behalf of Vivas Invest & Finance Limited 23.01.2025	Farrer & Co LLP acts on behalf of Vivas Invest & Finance Limited the owner of the Grade I listed former Midland Bank headquarters building which is used as the five star Ned hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel). Requests that the Council refuse the application on the following grounds (**objection**): - the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; - the extent of the Proposed Development (including the increase in floorspace) is inconsistent across the Application documents and does not clearly identify the scope of the proposed works; - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

		- the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the Proposed Development harms surrounding heritage assets; - the Application fails to correctly assess the daylight and sunlight impacts; and - lack of adequate community engagement on the Proposed Development. The full comments are available on the City's website, above is the summary points as outlined in the submitted letter. **Officer response**: It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks. In respect of additional land required for the construction phase of development that is not part of the land where permanent development will be carried out, it is also noted that there are permitted development rights for the use of adjoining land to be used in connection with and for the duration of operations being carried out. The applicant submitted an updated Application and CIL forms as mentioned further above in this section of the report which provides the correct figures of the proposed floor areas. Officers note that a pre-application advice is a paid service that the Local Planning Authority provides and does not hold any weight in the assessment and decision making of this application. Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation sections. Conditions have been

		recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.
8	MVHC LTD on behalf of Vivas Invest & Finance Limited 24.01.2025	MVHC Ltd has been commissioned by the owner Vivas Invest & Finance Limited and tenant Poultry Tenant Limited (Our Clients) of the Grade I Listed former Midland Bank headquarters building converted into five star Ned Hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel), to prepare this report as an **objection** to the planning application (24/00226/FULL). This document examines the submitted documentation accompanying the application for the planning permission and includes a brief summary of the significance of the identified heritage assets (in this case, relevant listed buildings and the Bank & Guildhall Conservation Areas) as well as the assessment of the potential impact of the proposed development on The Ned Building and other relevant heritage assets. The full comments are available on the City's website, following is a summary of the issues that predicated the objection as identified in the submitted report: - The design does not satisfy the requirements of NPPF. - Detrimental Impact on the setting of the Grade I Listed Building. - The proposal fails to preserve or enhance the character of the relevant heritage assets and their settings and therefore contravenes the tenets of NPPF and by implication, local plan policies. - The proposal will have detrimental impact on the enjoyment, use and interpretation of the significance of the Grade I Listed building. - The proposed two-storey roof extension resulting in increased height and its bulk, scale and materiality have harmful impact on the neighbouring Grade I Listed building. - The loss of outlook, and loss of privacy. **Officer response**: The issues raised are addressed in the Architecture, Urban Design and Public Realm, and

		Heritage sections of the report as well as under the Amenity section which relates to outlook. A design condition, including request of further details of the proposed materiality on all external faces of the building, has been recommended.
9	Ned-Soho House LLP 180 The Strand, London, WC2R 1EA 27.01.2025	Ned-Soho House LLP (Soho House), under a long-term hotel management agreement with Poultry Opco Limited (the Tenant), operate the Grade 1 listed former Midland Bank headquarters building at 27 Poultry, London, EC2R 8AJ as the five star hotel known as the Ned Hotel (the Ned Hotel). The commentors request that the Council refuse the application for the reasons (**objection**): - the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area; - the Application fails to correctly assess the daylight and sunlight impacts; - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - lack of adequate community engagement on the Proposed Development; - the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; and - the construction of the Proposed Development has not been properly considered and results in unacceptable negative impacts and risks for pedestrians, cyclists and other users of Poultry and Grocers Hall Court. The full comments are available on the City's website, above is the summary points as outlined in the submitted letter. **Officer response**: Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban

		Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation, and Transportation and Highways sections. Conditions have been recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements. It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. There are permitted development rights which are likely to apply to any adjacent land needed for the construction phase of the development. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks.
10	2 Nightingale Close Tring Herts HP23 5FS 27.01.2025	**Objects** for the following reasons: - the design of the proposed development does not respect the setting of the Ned hotel nor is it appropriate to the setting of 1 Poultry which is Grade II* listed and directly opposite the development. - the roof top extensions proposed will result in the applicants building becoming taller than the Ned and suddenly the setting of the listed building and the benefits of its rooftop amenity will be seriously and harmfully affected. - The applicant has failed to adequately assess the rooftop extensions in the context of the neighbouring listed buildings and the street views are not a true representation of the impact of the development on the conservation area. - Whilst the improvement to the energy efficiency is of course welcomed the remainder of the development does not provide any social, cultural or economic benefit to justify the harm that is caused. - The development also reduces the amount of street facing retail space on Cheapside which is really the "High Street" of the City of London. This is reducing

		the accessibility of the building to retail users and is detrimental to the community that work and reside in the City of London. - The applicant has made no attempt at any public or neighbourly consultation which is contrary to the guidance published by the City of London. **Officer response**: The matters raised are addressed in the relevant sections of this report, including Architecture, Urban Design and Public Realm, Heritage, Consultation, Sustainability, and Principle of development.
11	87 Lambton Road London SW20 0LW 27.01.2025	**Objects** for the following reasons: - One of the main attractions of the rooftop is the privacy it affords, particularly the rooftop and for use of the swimming pool. The proposed rooftop extension will overlook the Ned hotel's rooftop. I am very concerned by the significant impact the proposed construction of the new pavilion and roof terrace will have on this privacy. I understand that it will be used for various functions and events and therefore I am also concerned about the noise that will be generated from the rooftop extension. - the design of the proposed development respects the setting of the Ned hotel, a Grade I listed building, which is of exceptional interest as only around 2.5% of listed buildings are Grade I. The hotel is also in a conservation area. In combination this means that even more importance should be given to ensuring that the proposed design of the rooftop extension is appropriate, being so close to a Grade I listed building in a conservation area. The bulk and scale of the proposed development will have a detrimental effect on the conservation area and the setting of the Ned hotel. - There are also a number of architecturally significant buildings next to and around 1 Old Jewry, including the Ned Hotel building (27 Poultry) and No. 1 Poultry, designed by James Stirling. The proposed design is certainly not consistent with the

		quality and visual appeal of these buildings or the wider area. One would expect that new developments / extensions should enhance or build upon the beautiful neighbourhood. Or, at worst, they should provide a neutral backdrop for these buildings. Neither of these standards is met by the proposed development; I believe it would have an overwhelmingly negative impact on the area. It is also noteworthy that the planning application fails to even consider the visual or design impact of the rooftop extension on the surrounding buildings and area. - No consideration has been given to the construction of the development and how constrained the site is. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is used by many commercial operators and by construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period. In particular, I regularly commute by bicycle and could foresee a dangerous situation being created for cyclists and pedestrians; and - the applicant refers to having met with the owners of the Ned hotel and that they have sought to work positively and proactively with them. I cannot therefore understand why this planning application is no different to the previous scheme and takes no account of the overlooking and inappropriate bulk and scale of the rooftop extension. This is a major planning application. The lack of any real engagement by the planning applicant with the public is concerning. **Officer response**: The matters raised are addressed in the relevant sections of this report, including Architecture, Urban Design and Public Realm, Heritage, Consultation, Transportation and Highways, and Amenity (noise, overlooking).

12	Poultry OpCo LTD, The Ned, 27 Poultry, London, EC2R 8AJ 27.01.2025	Requests that the Council refuses the Application for the following reasons (**objection**): - the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area; - the Application fails to correctly assess the daylight and sunlight impacts; - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - lack of adequate community engagement on the Proposed Development; - the Proposed Development harms surrounding heritage assets; - the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; and - the construction of the Proposed Development has not been properly considered and results in unacceptable negative impacts and risks for pedestrians, cyclists and other users of Poultry and Grocers Hall Court. The full comments are available on the City's website, above is the summary points as outlined in the submitted letter. **Officer response**: Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation, and Transportation and Highways sections. Conditions have been recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.

		It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks.
13	The Lutyens Trust, Goddards Abinger Common, Dorking Surrey, RH5 6JH 28.01.2025	**Objects** for the following reasons: - The above site sits alongside the grade I former Midland Bank Headquarters, designed by Lutyens, recently skilfully and sensitively converted to The Ned Hotel. It was originally built between 1924-39 at a time of rapid acquisition, consolidation, and expansion by the Midland Bank. The project was of sufficient significance to the status of the bank to warrant employing Sir Edwin to collaborate with one of its usual commercial architects, Gotch and Saunders. Lutyens was entirely responsible for the external form, the banking hall, vault, the Directors 'palatial accommodation on the top floor, and important staircases. His role was to add refinement and timelessness to a modern steel frame. The external elevations are of monumental and sophisticated design with subtle set-backs and diminishing courses that demonstrate Lutyens's concern for the smallest detail. The building is widely considered to represent one of the pinnacles of Lutyens's achievement, and is therefore a highly important building by one of England's greatest architects. In particular, the top floors are carefully articulated to create a roofline of some distinction. The Lutyens Trust is concerned that the neighbouring proposal risks presenting an awkward profile alongside Lutyens's elegant roofscape. We ask that all significant viewpoints are investigated to ensure that the proposed new floors do not intrude alongside the elegantly composed Lutyens roofline. Of no less concern is the impact on the amenities of The Ned. The hotel developers endeavoured to civilise the formerly utilitarian hidden roofs to the

		rear of Lutyens's domain. They created a swimming pool with private terrace that introduces a space of both spatial quality and amenity. The neighbouring proposal (just across the narrow Grocers 'Hall Court) will intrude on both the setting and privacy of this feature. The viability of the Lutyens building in its appropriate current use depends on the success of the hotel. The commercial and amenity value of its investment will be compromised by the proposed intrusion. The Montagu Evans Heritage Assessment majors on the valuable amenity that the new rooftop pavilion and terrace would bring to One Old Jewry but then fails to consider the intervisibility with The Ned's own amenity (described above) at this level. Montagu Evans advise there is no harm in the proposals to surrounding property only because they find - in para 4.32 - a 'lack of intervisibility from surrounding streets' yet fail to consider the same at roof level, despite recognising how considerable this amenity is for One Old Jewry. **Officer response**: The matters raised are addressed in the relevant sections of this report, including Architecture, Urban Design and Public Realm, Heritage, and Amenity (overlooking).

36. In response to objections regarding amenity impacts to the hotel neighbours to the east of the application site, the applicant updated their design to increase screening of the east side of the roof and made some minor rearrangements of the proposed roof terrace and pavilion access to limit access to the eastern side of the roof as much as possible as a way to safeguard the privacy of the neighbouring hotel roof terrace.

37. Following these updates and the March 2025 re-consultation, the following comments were made by the public. The full comments are available for public view on the online City of London website of this application, some comments have been summarised due to their length.

No.	Address	Comment
1	147 Warehouse Court Major	**Objects** to the application on the following grounds: 1. Loss of retail space on the ground floor. There is a

	Draper Street London 12.05.2025	current high demand for such space in Central London and it would be a shame to lose further space to a scheme that does not take this into account. This area of the City especially has very little in the way of vacant retail units - something that will only be exacerbated as further office units which have already been given consent (numerous within walking distance to the site) are completed. Indeed, these seem to be a couple of the very limited number of vacant units in the City - which I can only assume is a choice to prioritise this development. 2. Given this is a conservation area, one would query the decision to place significant amounts of plant onto the roof of the development, which could be (and indeed under its current construction already is) located elsewhere within the development. The plant is not pleasing to the eye to say the least. 3. The current plans would overlook a public pool on the roof of an adjacent property, which is an invasion of privacy and reduces the benefit of an amenity which is rare for central London and should be protected. **Officer response**: The matters raised are addressed in the relevant sections of this report, including Principle of development, Architecture, Urban Design and Public Realm, Heritage, and Amenity (overlooking).
2	Farrer & Co LLP on behalf of Vivas Invest & Finance Limited Incl. attachments of GIA letter (13/05/2025); MVHC letter (May 2025)) 13.05.2025	Farrer & Co LLP acts on behalf of Vivas Invest & Finance Limited the owner of the Grade I listed former Midland Bank headquarters building which is used as the five star Ned hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel). Requests that the Council refuse the application on the following grounds (**objection**): - the site location plan does not include all land necessary to carry out the Proposed - Development contrary to national validation requirements; - the extent of the Proposed Development (including the increase in floorspace) is inconsistent across the Application documents and does not clearly identify the scope of the proposed works;

		- the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area; - the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the Proposed Development harms surrounding heritage assets; - the Application fails to correctly assess the daylight and sunlight impacts; and - lack of adequate community engagement on the Proposed Development. **Officer response**: It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks. In respect of additional land required for the construction phase of development (that is not part of the land where permanent development will be carried out), it is also noted that there are permitted development rights for the use of adjoining land to be used in connection with and for the duration of the main operations (the subject of this application) which are to be carried out. According officers are satisfied that the redline location plan identifies the relevant land subject to the application based on the description of the development within the application, and that it complies with the guidance in the Planning Practice Guidance which advises that the location plan *'should include all land necessary to carry out the proposed development (e.g. land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings).'*

		The grant of planning permission does not override any private rights or overcome the need to secure access rights from third parties to enable the delivery of a development where they are needed. It is normal for other consents to be required post permission to enable the delivery of a development and planning permission does not grant any interest in land, provide any licences or easements. The applicant submitted an updated Application and CIL forms as mentioned further above in this section of the report which provides the correct figures of the proposed floor areas. Officers note that a pre-application advice is a paid service that the Local Planning Authority provides and does not hold any weight in the assessment and decision making of this application. Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation sections. Conditions have been recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.

Policy Context

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

39. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which has undergone Regulation 19 consultation. The City Plan 2040 has been submitted to the Secretary of State and it is currently being examined in public (with hearings having commenced in March). Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with

paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

40. 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.

41. 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.

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

43. 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:

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

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

- the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, 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. [Footnote 9: The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.]

44. Paragraph 49 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

a) 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)."

45. 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.

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

47. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

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

49. 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".

50. 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.

51. 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".

52. 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."

53. 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, with a high standard of amenity for existing and future users.

54. Paragraph 136 of the NPPF states that 'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'

55. 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.

56. 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 and take full account of all climate impacts including overheating. 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.

57. 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 and help to reduce greenhouse gas emissions, such as through its location, orientation and design.

58. Paragraph 167 provides that Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated

heritage assets, local planning authorities should also apply the policies set out in chapter 16 of the Framework.

59. 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.

60. 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."

61. 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".

62. 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:

- grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

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

63. 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".

64. 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”.

65. 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.”

Considerations

66. 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).

67. 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).

68. In considering whether to grant planning permission for development within a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (S.72(1) Planning (Listed Buildings and Conservation Areas) Act 1990. When considering the impact of proposed development on a conservation area it is the entirety of the proposal which is in issue.

Assessment

69. When assessing the proposed development consideration has been given to the Development Plan which consists of the London Plan 2021 and the City of London Local Plan 2015. Often it will be the case that there will be policies in the Development Plan which support a 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 the proposal does or does not accord with the development

plan as a whole. In respect of this application, for the reasons explained in this report, officers are of the view that the development complies with the development plan when read as a whole.

70. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which has undergone Regulation 19 consultation. The City Plan 2040 has been submitted to the Secretary of State and it is currently being examined in public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF.

71. 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.

Principle of development

Office Use

72. The site is within Central Activities Zone (CAZ) as defined in the London Plan, the core business location and one of the main areas where new office development should be prioritised. 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 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.

73. Policy DM10.3 (Roof gardens and terraces) of the Local Plan 2015 and emerging Policy DE4 (Terraces and Elevated Spaces) of the City Plan 2040 both encourage elevated spaces where appropriate. The supporting text for the policies generalises that roof gardens and terraces are becoming increasingly common in the City, in response to demand from developers and occupiers. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.

74. The existing office occupiers are in the process of vacating the accommodation. By the time Officers visited the site, in Spring 2024, some floors of the office accommodation had already become vacant.

75. The application proposes improvements to the efficiency and overall quality of the office accommodation. An upward extension by way of a new pavilion structure at the roof level is proposed to provide an additional 385sqm of office floorspace. The new pavilion would provide direct access to the newly formed

roof terrace. In order to create the proposed roof structure and terrace the proposals infill the existing sunken plant areas at eighth floor, which provide an addition of 106 sqm to the overall floorspace. The proposed development will therefore result in an increase of office floorspace of 491sqm by way of additional build elements to be used for office accommodation, amenity and ancillary purposes.

76. This provision of additional office space at roof level and additional surrounding amenity (terrace) would align with the ambitions of policies DM10.3 of the Local Plan and emerging policy DE4 of the City Plan 2040. The private terrace would increase the amenity facilities for the application site, thereby creating a more enticing office offer, while also adding to the network of surrounding private terraces which are becoming more common place within the city. This is particularly pertinent within the immediate locality with such terrace examples as located at the Ned Hotel (approved under reference 13/01036/FULMAJ and subsequent applications), 1 Poultry (reference: 4616AG) and 100 Cheapside (reference: 12/00772/FULL).

77. The proposal also seeks to introduce additional office floorspace on the ground and basement levels by reconfiguring the existing Class E space (retail and office) to allocate more of the existing floor space for office and less for retail use. The basement currently provides 373sqm of retail space (Class E) which would be converted to office (Class E). In terms of the ground floor, it currently comprises office accommodation to the north part and three retail units to the south part. The proposal retains some of the ground floor retail and seeks to convert 157sqm of retail for office accommodation. This rearrangement would create some 530sqm of additional office floorspace on site. The relevant assessment on the loss of retail floor space on site is discussed in the following section of the report.

78. 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 an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in an uplift of office accommodation and would improve the operational efficiency of the building contributing to the long-term activation of the office accommodation in the City.

Loss of Retail

79. Core Strategic Policy CS20 of Local Plan 2015 and Strategic Policy S5 of the emerging City Plan 2040 seek to promote and encourage new retailing in the Principal Shopping Centres (PSC) with active frontages. Policy DM20.1 and

emerging Policy RE1 state that within the PSC the loss of existing ground floor retail frontages and floor space will be resisted.

80. It is highlighted that the legal context to Policy DM 20.1 has changed, following changes to the Use Class Order 1987 (as amended) on 1st September 2020 where the former use classes of shops, financial and professional services, restaurants and cafes, non-residential institutions, and assembly and leisure uses merged into one use class (Class E), which allows changes between Class E uses at any time without the need for planning permission (i.e. changes from a shop to a café or offices), unless there is an existing planning restriction for a particular site. The assessment of the proposals has therefore taken these changes into consideration.

81. As mentioned in the site and surroundings section, the south frontage of the application site falls within the Cheapside Principal Shopping Centre (PSC) and therefore the relevant PSCs policies would apply.

82. The proposed development would result in the loss of the whole retail space in the basement levels (373sqm) and approximately 157sqm of retail space at ground level. Since the introduction of Use Class E as mentioned above, unless a restriction applies (i.e. a condition attached to a previous permission for example) for the continuous use of the former commercial uses, planning permission would not be required for their loss given the now interchangeable nature of the new Use Class E. In this instance, only the ground level retail space is protected by Condition 5 of planning permission Ref. No. 05/00182/FULL, which requires the continuous use of this area as shops given their location within the PSC. No such restrictions have been imposed to the basement retail areas. I In light of this the current application seeks permission to only change a limited part of the existing ground retail space into office use to allow for the enhanced office lobby area proposed. Changes within Use Class E for the remaining areas (i.e. the basement) would not constitute development under Section 55 of the TCPA 1990 and therefore would not be assessed under this application. This basement area, in effect has carte blanche to transition to uses within the Class E Use class and as such the focus of the assessment of change of use is wholly with regard to the ground floor element.

83. The submitted planning statement provides a background of the existing retail conditions on the site. The existing shopfront creates lack of visibility due to the narrow windows and deep reveals which affects the letability of the units. One of the three retail units, located at the beginning of the PSC to the southeast, has remained vacant for the past couple of years ever since the pandemic occurred. At the time of this report, it is noted that none of the ground floor retail units are occupied. For the avoidance of doubt officers agree with the comment made by an objector to the effect that where an applicant has allowed a retail space to become vacant in anticipation of a proposed development, that this

cannot be used to justify the removal of a retail space, and officers note that this is not the basis on which the recommendation is made.

84. The proposed development would result in the loss of approximately 157sqm of protected retail floor space at ground floor level, within the Principal Shopping Centre. The thrust of policy DM20.1 (Principal shopping centres) is to protect against loss of retail frontage and floor space within these areas and therefore the proposal would be in conflict with this Policy. The proposed development, however, would seek to retain the existing retail frontages and provide revisions to their shopfront to make the units more attractive and legible. The existing retail floorspace at ground level is approximately 511sqm of which 157sqm would be lost. This equated to 30% loss of the total retail area as identified and protected by existing planning conditions for the site. The retention of the active retail frontage and the limited reduction in retail space, while in conflict with Policy DM20.1, is not considered to compromise the functionality of the units or their continuous presence in Cheapside PSC. While the proposal would lead to a limited reduction in retail floor space which DM20.1 would seek to protect, the proposed alterations are considered to provide a greater, more efficient usage of space while also creating a vibrant, welcoming retail experience within the PSC. The proposal would therefore, on balance in these particular circumstances, still support the retention and enhancement of the PSC as a shopping destination within the City which is one of the reasons for policy DM20.1.

85. Furthermore, the existing restrictions imposed by the implemented consent (Condition 5 of planning permission Ref. No. 05/00182/FULL) would continue to apply to the site and will be carried over to the new permission (in an updated form) to ensure the continued retention and enhancement of the PSC.

86. Overall, therefore, the proposed development would lead to a loss in floorspace contrary to Policy DM20.1 of the Local Plan and emerging Policies S5 and RE1. However, the proposed alterations are considered to provide a greater, more efficient usage of space while also creating a vibrant, welcoming retail experience within the PSC. Furthermore, the loss of retail floor space for enhanced office space would align with the Strategic Policy CS1 (Office) which seeks to maintain the City's position as one of the world's leading financial and business centres.

Architecture, Urban Design and Public Realm

Policy Context

87. The relevant Local Plan 2015 policies for consideration in this section are CS10, DM10.1, DM10.3, DM10.4, DM10.5, DM10.8, CS12, DM12.1, DM12.2, DM12.3, CS13, CS16, DM16.2, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, S10, AT1, S11, HE1,S13, and London Plan Policies D3, D4, D5, D8, HC1, HC3, HC4.

The Existing Site and Surrounding Townscape Context

88. 1 Old Jewry was completed in 2008 by Sheppard Robson Architects and is located at the junction of Old Jewry and Cheapside/Poultry and is located on the edge of the Bank Conservation Area and adjacent to the Guildhall Conservation Area. The primary frontage of the existing building fronts Poultry and sits as a modern insertion to this historic street formed of large city blocks clad in Portland Stone. The building makes a neutral contribution to Conservation Area and is not a non-designated heritage asset. The townscape context of the locality is of a modest scale with the primary frontage to Cheapside/Poultry and narrow streets running north south. The roofscape is of a varied character formed of traditional mansard roofs, utilitarian plant rooms and well considered modern insertions which are stepped back from primary elevations, as found at the neighbouring Midland Bank.

89. Overall, the existing building sits comfortably within the built context in terms of scale, massing, materiality and appearance however the ground floor fronting Cheapside and Old Jewry is less successful due the narrow deep openings reducing the level of activation along primary retail routes.

Proposal

90. The proposal is for the erection of a two-storey pavilion building at roof level with a private roof terrace, alterations to the ground floor elevations and facade upgrades.

Architecture and Materiality

Bulk, Height and Massing:

91. The disposition of the final massing and bulk has followed a design-led approach considering local townscape views, relationship with neighbouring buildings and surrounding heritage assets. The massing of the rooftop pavilion has developed through the pre-application process to create a well-integrated piece of design which sits comfortably in the varied roofscape. The additional bulk and massing of the pavilion and plant would increase the total height of the building from 49.660m AOD to 57.455m AOD. The modest scale of the rooftop pavilion and plant would result in minimal visual impact and there is limited visibility from the public realm of surrounding streets. The additional massing

would only be glimpsed from the public realm in fleeting oblique views along Old Jewry. The pavilion and plant are set snugly to the party wall line of 8 Old Jewry and would be set back from the existing parapet line on all other aspects creating a generous amenity terrace for the office users and so maintaining the consistent existing shoulder height along Cheapside/Poultry.

92. The pavilion and plant structure would result in an overall height which is taller than direct neighbours and would be visible from the surrounding roof terraces and high-level windows. The rooftop extension would be a complimentary addition to in the existing varied roofscape of the surrounding townscape. When viewed from public realm along Old Jewry this height, scale and massing is not visually prominent and is commensurate with neighbouring building's roof roofscapes when glimpsed from the local public realm. As demonstrated in the digitally testing of local townscape views submitted within the Design and Access Statement.

Expression and Materiality:

93. By virtue of the proposals, much of the Portland stone façade is to be retained with minor alterations to window openings and ground floor elevations. However, the approach to the top of the building differs and will be read as legibly modern insertion into the roofscape. Owing to the building's location within the Bank Conservation Area and surrounding heritage assets, the character and expression of the pavilion has been carefully considered to ensure it constitutes good design through its well-proportioned, simple, compatible yet subtly contrasting facade treatment. With careful consideration given to the thoughtful materiality and colour palette to create a legibly different yet complimentary extension. The building has a clear base, middle and top, elaborated upon below.

Base

94. The proposals to the base of the existing building would increase the amount of glazing, opening up the ground floor frontage to Poultry and Old Jewry. Improving the activation along a key retail route and enhancing the pedestrian experience of the street, while also responding to the existing architectural symmetry of the facade.

95. The proposed changes to the base along Old Jewry would comprise of removing the three solid bays which would create more visual permeability into the building. The central four bays would be combined to create two double bays, one of which would create a new office entrance. The existing office entrance would become a dedicated cycle entrance connecting into improved end of trip facilities in the basement. The improved pedestrian experience and cycle facilities would encourage active travel and comply with Local Plan policy DM10.1 and Emerging policies S8 (1) (2) (6) and DE2.

96. The proposed works along Poultry would create larger shopfronts creating more visual permeability into the building while still respecting the architectural rhythm of the existing building and its context and would incorporate a unified signage strategy for all three retails units in line with the shopfront policy DM10.5.

Body of *the Building*

97. The proposed alterations are modest and would retain the existing rhythm of the body of the building while introducing facade alterations which would include the replacement of all the windows within the existing openings, removal of the louvers along Poultry, introduce openable windows and replacement of the existing balustrades to the terraces along Old Jewry at levels 05 and 07, Grocers' Hall Court at level 05 and along Poultry at level 07.

98. The proposed works along Poultry would remove the existing louvers creating a more uniformed treatment to all the elevations. To mitigate the risk of solar gain from removing the louvres, the lower portions of the southern windows are replaced with new solid panels. Additionally, side hung solid opening vents would be introduced into the narrow-glazed elements across alternating bays on the façade on levels 3, 4, 5 and 6.

99. Openable windows would also be introduced to the east and west elevations within alternating bays. The new window module would be inserted into the existing opening and would be formed by dividing the existing window in two vertically, creating one opening window with a fixed pane below and one fixed vertical window. The verticality and rhythm of solid and void would be retained.

Rooftop Pavilion and Plant

100. The architecture and materiality of the pavilion would be simple and recessive creating a subservient and modest but clearly modern extension. The architectural detailing of the extension would contrast with the existing solid Portland stone facades and would comprise timber cladding, timber soffits, dark bronze metalwork and dark bronze acoustic louvers. The plant enclosure would screen all the plant equipment from view while ensuring consistent architectural language between the pavilion and the plant enclosure, creating an integrated architectural design. The overall architectural language sits in contrast with the lower portion of building creating its own architectural set piece albeit through the use of the material palette, particularly the use of dark bronze metal work, there would be a consistency across the building.

101. The proposal would be of a high quality and when glimpsed from surrounding streets, as seen in Townscape View 04, it would quietly integrate into the wider layering of varied roof tops on the local skyline. It would be directly visible from the surrounding elevated private roof terraces at One Poultry and the Ned Hotel. The proposal has been designed with a richness of material and detail

to ensure that the quality is retained at this high level, through the use of punched windows, timber cladding which would be formed of varied widths adding visual interest and texture and high-quality landscaping. Further design detail including material samples would be secured via condition to ensure this quality is delivered to construction stage.

102. The new roof terrace would provide a fully accessible roof terrace for all office users providing views across the City. The proposed balustrade would be a minimum of 1400mm and formed of a decorative metal railing. Further detail regarding suicide prevention would be secured via condition. Officers note CAAC's objection to the location of the proposed balustrade at the perimeter of the new roof terrace being too far forward on the south elevation and their recommendations that a setback approach would reduce impact to the character and appearance of the Conservation Area. A full assessment has been undertaken further below within the Heritage section of this report that responds to this comment. The balustrade has been designed to be minimal and subservient to reduce the visual impact when viewed from the public realm including longer range views from Bank Junction, as seen in Townscape View 01 and 04. Further design detail will be secured via condition.

Outdoor Amenity and Landscape Design

103. The proposed amenity terrace at level 09 would wrap around the new pavilion structure. The space would incorporate planters, fixed and unfixed furniture to create a flexible space while ensuring inclusivity and safety. To the east of the site the amenity terrace of the neighbouring building is across the street and to limit overlooking high level planted screens would be installed to obscure views out from within the pavilion. Further detail regarding planting and maintenance would be secured via condition.

104. The terrace layout and balustrading would be designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. Further detail regarding suicide prevention and inclusivity and landscaping would be secured via condition.

105. The final details of the landscaping including full planting specification, hard and soft materials, furniture, maintenance regime, and irrigation, will be conditioned to ensure the design and materials are of high quality, so the landscape thrives and is of acceptable design quality, and is fully inclusive.

106. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night. Further detail would be secured by condition.

Conclusion on Architecture, Urban Design and Public Realm

107. Third party representations object to the visual impact of the proposal due to its contrasting design and materiality within the historic setting of the area these are addressed in the heritage section of the report.

108. Officers consider that the architectural design of the building would be high quality and whilst contrasting with the main building would be compatible with the existing context in terms of scale and massing and would have minimal visual connection to the public realm. When viewed from neighbouring roof terraces and high-level buildings the materiality and detailing would be of a high quality adding to the varied layered roofscape of the surrounding area. The alterations to the existing facade would improve the sustainability of the building and while maintaining the building's contribution to the local townscape. The ground floor would also be transformed to be outward-facing and visually permeable, encouraging a positive interaction with surrounding streets. The proposals would introduce landscaping to level 09, providing new planting and opportunities for sitting and external amenities.

109. The proposals would comply with Local Plan Policies CS10 and DM10.1, Draft City Plan Policy S8, DE2, HL1, and London Plan Policy D3, and paragraphs 135 and 137 of the NPPF.

Heritage

110. The CAAC have objected to the application due to the setting out of the proposed balustrade, stating that it should be pulled back from the front elevation in order to reduce the adverse impact on the character and appearance of the Conservation Area.

111. Historic England did not consider their engagement would add value to this planning application, therefore did not provide a comment.

112. Third party representations have raised objections regarding the impact of the proposal, raising concerns on the alterations to the elevations of the existing building, the scale, massing and materiality of the extension on the setting of the surrounding listed buildings and the character of the conservation area.

113. Officers have undertaken a full assessment, through a digital model and townscape views, of the impact on the setting of surrounding heritage assets and the character and appearance of the Bank Conservation Area as set out below.

Direct Impacts

Bank Conservation Area

Significance

114. First designated in 1971 with the SPD adopted 2012. This, the City's largest conservation area, comprises the commercial heart of the City around the focal point of Bank Junction. The majority of it comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, creating the sense of an intact historic townscape. There is high architectural and historic interest in the contrast of medieval street plan, elegant, high quality C19 and C20 (primarily high finance) buildings and more modern but largely sympathetic office developments.

115. The characteristics which contribute to the special interest of Bank Conservation Area, are summarised as follows:

- An area where buildings and streets are harmonised by their predominant use of solid masonry facades with regular punched openings, enriched by abundant classical modelling and surface detail;
- A number of nationally significant and well-known buildings, the headquarters of major corporations, and internationally significant churches;
- An area defined by the design and use of buildings for banking and associated commercial activities;
- An area of large-scale commercial buildings set on principal thoroughfares within a network of historic streets, courtyards and alleyways, which creates a distinctive and dense urban environment;
- The largest concentration in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous unlisted buildings of high architectural quality from different periods;
- A visual character and groundscape that is enriched by a wealth of materials, features, monuments, public sculpture, signs, plaques, statuary, and other structures;
- An area characterised by the restrained presence of modern signage and advertising;
- An area associated with nationally significant cultural and historic events and notable people.

116. The Conservation Area is formed of four sub areas, the proposal site is located in the Bank Junction sub area. The majority of buildings on the Junction are detached or occupy an entire block with streets and lanes to every side, most of which are historic thoroughfares. This specific part of the City is unusual in that it is possible to view buildings face-on from a distance, either across the space or on approach from one of the radiating roads. Buildings away from the main open space are seen obliquely when approaching the junction and make

a contribution to its character. Each building makes a distinctive contribution to the area's character and appearance, and there are a number of common architectural characteristics that unite individual buildings and the space as a whole. It is the monumental scale of buildings, and their predominant use of Neo-Classical architecture and Portland stone that gives the area its special character.

117. Buildings around the junction are all of a similar scale, with the majority having additional set-back attic storeys or mansard roofs including the modern insertion of a setback storey at the Midland Bank next door. The visual impact of building height is alleviated by a variety of surface features and treatments, including rustication, entablatures, string courses, sculpture, and architraves.

118. Buildings which depart from the predominant use of Portland stone are no.1 Queen Victoria Street, which is built of sandstone that provides a warm contrast to the expanses of limestone on other buildings; and No. 1 Poultry which is faced with contrasting bands of Australian beige and Gloucester "Wilderness Red" sandstone that are integral to the character of this distinctive late 20th century postmodern building.

119. 1 Old Jewry is described in the Bank Conservation Area SPD as being appropriately proportioned with a simple grid of Portland Stone incorporating deep window reveals and is deemed to have a neutral contribution to the Conservation Area.

Impact

120. Third-party representations object to the bulk and massing of the pavilion alongside its modern architectural language. Officers have undertaken a full assessment including townscape views and digital model and conclude the pavilion would only be glimpsed in oblique views along 1 Old Jewry, and in this case, the presence, form and materiality would be subtle and well designed.

121. The site appears in two local townscape views, no.38 and no.72, highlighted in the Bank Conservation Area Character Summary & Management Strategy SPD as having a strong contribution to the character of the conservation area. View 38 is taken from Lombard Street looking North-West to Bank Junction and View 72 is taken from the junction of Lombard Street and King William Street looking North-West towards 1 Princes Street. 1 Old Jewry is a background element in these views with its primary elevation is visible on the oblique and a limited portion of the eastern flank wall. Both these views are characterised by grand Portland stone buildings centred around Bank Junction including, 1-6 Lombard Street, 1 Cornhill, 1 Princes Street and the Midland Bank. The view would remain largely unchanged due to the site being located at a significant distance and the significant setback of the rooftop pavilion, however, the alterations to the existing primary elevation and the new decorative balustrade would be visible, as demonstrated in Views 2 and 3 in the Design and Access Statement.

The extension would be neither distracting nor dominant and would not be a noticeable skyline feature.

122. The proposals would increase the overall height and massing of the building by a two-storey set back extension and roof terrace with a 1400mm balustrade. The bulk of the pavilion has been designed to ensure that it is not visible in key views from within the Conservation Area. However, it would be visible in fleeting oblique views along Old Jewry and high-level windows and terraces of neighbouring buildings. When glimpsed in oblique kinetic views moving down Old Jewry, as demonstrated in View 04 of the Design and Access Statement, it would appear as its own unique architectural set piece while retaining a subdued and unobtrusive presence and would be understood as a new subordinate architectural moment within an already varied roofscape which defines this part of the Conservation Area.

123. The proposal would be visible from neighbouring historic and modern private terraces, and this has formed the basis of a number of objections. Officers have considered the representations received and are satisfied that the architectural quality of the proposals would be of high quality for these closer upper-level experiences and would blend into the varied utilitarian roofscape. From the neighbouring buildings terraces, No. 1 Poultry and the Midland Bank, the key views out across the Bank Conservation Area, which are characterised by Bank Junction in the foreground and the Eastern Cluster in the background would be retained with the additional massing at 1 Old Jewry being located behind the viewer. The additional structure would be noticeable from the terrace but would have a neutral presence in respect of the character and appearance of the Conservation Area.

124. The proposed materiality of dark stained timber, CLT soffits and dark bronze metalwork of the Pavilion would sit in contrast to the prevailing aesthetic of the Bank Junction sub area which is characterised by predominant use of Portland Stone. However, as stated above there is no intervisibility between proposed pavilion structure when viewed from Bank Junction. Where viewed from the public realm along Old Jewry and form neighbouring building the proposal would sit within the wider variety of materials found within the Conservation Area, such as the sandstone of No.1 Queen Victoria Street and contrasting bands of Australian beige and Gloucester “Wilderness Red” sandstone at No.1 Poultry. The surrounding roofscapes are characterised by variety of materials, from the traditional slate and metalwork roofs to modern insertions such as the highly glazed and black metalwork pavilion at the Midland Bank. It is considered the area is sufficiently robust to accommodate the proposed modest use of more contemporary materials at a high level.

125. CAAC’s raised an objection relating to the location of the proposed balustrade however officer have come to a different conclusion. The existing building terminates abruptly, and the introduction of the decorative metal balustrade

would add additional detail to the shoulder of the building, and parapet line, in line with prevailing character of the Conservation Area which has highly articulated cornice lines, eaves and parapets. The balustrade would read as a well-designed, subtle and minimal embellishment.

126. The proposals to the existing facades would retain the existing rhythm of the building and the removal of the louvers from the Cheapside/Poultry elevation, improving the solid to void ration as is characterful of the other prominent masonry buildings within the Conservation Area. This would have a neutral impact on the character of the Conservation Area through the increased visibility of the punched opening within the primary elevation, a key harmonising feature of the Bank Junction sub area of the conservation area.

127. The pavilion when glimpsed in the Conservation Area in the kinetic view along Old Jewry will bring a distinctive but subtle new architectural feature to the historic roofscapes, whilst remaining deferential to the strong architectural language of Bank Junction this is due to its subdued scale, set back and suppressed form and massing which mitigate any adverse impacts. When considered against this large Conservation Area as a whole, the impact on character and appearance would be very limited and not adverse and so would preserve the character, appearance and significance of the Conservation Area.

Indirect Impacts

Midland Bank – Grade I

Significance

128. Designed as the headquarters of the Midland Bank in 1924 by Sir Edwin Lutyens and converted to hotel use in the early 21st century. The Midland Bank occupies a prominent location within the Bank Conservation Area. Classical in style, with the majority of the external facades in Portland stone, it joins a group of other imposing listed building around Bank Junction, including 1 Prince's Street (Grade II), the Bank of England (Grade I), Mansion House (Grade I), 1 Queen Victoria Street (Grade II) and the Royal Exchange (Grade I). Having been described as one of Lutyens's "finest urban buildings", the former Midland Bank has historic interest owing to its association with Edwin Lutyens, one of the most prominent architects of the early-20th century. The building derives further historic interest as the City's oldest surviving premises for a joint-stock bank. It also articulates the period of commercial development within this aera of the City, in which the majority of buildings constructed in this period were defined by their use as banks and associated financial institutions.

129. In 1992 the building was vacated and in 2013 it underwent a comprehensive refurbishment and change of use to the Ned Hotel, which was completed in 2017. The conversion includes 252 hotel rooms, conversion of the lower levels into hotel facilities such as spa, swimming pool, bars and restaurants and the

introduction of a private members club at roof level. The member's club is formed of roof terrace, with a swimming pool and pavilion restaurant, characterised by the lightweight dark metal structure and its highlight glaze facade. The conversion to hotel and external alterations at roof level are not deemed to contribute to the significance of the listed building.

Contributing of Setting

130. Further to the building's intrinsic architectural and historic interest, its setting makes a positive contribution to its overarching significance, comprising the civic centre of Bank Junction. Owing to its position on Poultry, immediately to the west of Bank, the building is surrounding by commercial development dating to a similar period and of a similar architectural style, bound by a consistent use associated with commerce and banking, as well as being consistent in terms of materials, with high levels of Portland stone and classical detailing.

131. 1 Old Jewry is a sympathetically designed neighbour to the listed building, clad in complimentarily Portland Stone with a repetitive gridded facade which follows similar proportions, matching the existing shoulder line. 1 Old Jewry is a neutral contributor to the setting of the Midland Bank.

Impact

132. Third party representations object to the introduction of the pavilion structure due to its lack of visual integration into the existing building and the wider roofscape as a whole. As well as the impact on the outlook from the rooftop terrace of the hotel which is addressed elsewhere in the report. Officers have undertaken a full assessment of the indirect impacts on the Midland Bank including visiting the roof top terrace and reach different conclusions.

133. The proposed development includes external alterations to the existing façade which would increase activation at ground floor and would provide a more uniform, ordered façade, with a regular rhythm and a more resolved/ improved solid to void ratio. These alterations would be a change within the setting of the Midland Bank but would have a neutral impact on its significance due to the horizontal proportions, materiality and subservient nature being retained.

134. The pavilion rooftop extension, with additional plant above is well set back from the building frontage, with an external amenity terrace. The setting back of the proposed pavilion has been designed to be responsive to the building's surrounding sensitivities, including key views across Bank Junction towards the primary elevation of Midland Bank. This has been illustrated within the supporting Design and Access Statement View 1, illustrating that only the proposed terrace balustrade would be slightly discernible but not distracting, and the principal elevation of the listed building would remain unblemished within these moments of intervisibility. At no point would the extension or balustrade occlude or back drop the Midland Bank and the ability to appreciate

its elegant roofscape, the architectural and historic values from surrounding streets would be entirely preserved.

135. The proposed extension and landscaping will be visible from the private roof terrace of the listed building and there would be a change to the setting at this level. While this has generated objections, it is not considered to constitute a negative effect on its significance as a former, early-mid-20th century banking headquarters, which did not historically have external terraces or outdoor rooftop amenity space. Accordingly, the setting and significance of the Midland Bank would be preserved.

No.1 Poultry – Grade II*

Significance

136. No. 1 Poultry is an exceptional example of commercial post-modernism, constructed as a speculative commercial building incorporating both offices and retail units, a restaurant and rooftop garden. The building was designed in 1985-88 by the prolific post-war British architect James Stirling, though was not completed until 1997. Being one of James Stirling's last projects, No. 1 Poultry expresses Stirling's singular approach to design, formed on a monumental scale on a restricted triangular site, at the intersection of Queen Victoria Street and Poultry. Much of its architectural interest is derived from its form and appearance, as well as spatial arrangement, with the design of the building being characteristic of Stirling's work in its exploration of space and movement through interlocking geometrical forms and through its combination of motifs and materials. On the building's eastern frontage, the apex of the buildings is distinguished by its prominent tower, with a circular window in the form of a clock.

Setting

137. No. 1 Poultry occupies a triangular plot, between Poultry and Cheapside to the north, and Queen Victoria Street to the immediate south. The building addresses the Bank Junction to the east and following the form and layout of the surrounding street network. The building's immediate setting comprises an eclectic mix of historic and modern buildings including the application site, associated with various phases in the development of the City and its evolution over the past two centuries. 1 Old Jewry while maintaining the sense of scale and grain prevailing around Bank Junction does not specifically contribute towards the significance of the listed building and is a neutral element to its setting.

Impact

138. Third party representation have raised objections relating to the introduction of the pavilion structure due to its lack of visual integration into the existing building and the wider roofscape as a whole. Officers have carried out a full assessment

of the indirect impacts on No. 1 Poultry including a site visit and reached different conclusions.

139. The proposed development includes external alterations to the existing façade which would improve activation at ground floor and would provide a more uniform, ordered façade, with a regular rhythm and a more resolved/ improved solid to void ratio. No.1 Poultry is experienced in kinetic views looking north and south along Poultry however both would only be glimpsed in oblique views. These alterations would have a neutral impact on the significance and setting of No.1 Poultry.

140. The proposals include the introduction of a pavilion rooftop extension, with additional plant above. The pavilion is to be set back from the building frontage, with an external amenity terrace. The setting back of the proposed pavilion has been designed to be responsive to the building's surrounding sensitivities, including key views across Bank Junction and towards the prominent tower of No. 1 Poultry as illustrated within the supporting Design and Access Statement View 1 only the proposed terrace balustrade would be discernible as a distant feature and the principal elevation of the listed building will be unblemished.

141. The proposed extension would be visible from the terrace associated with the restaurant at roof level and this has been the cause of objections. The proposal is located on the opposite side of Poultry and due to the new massing location at the northside of the site would be recessive and subservient. The visibility of the new massing, balustrade and landscaping would be minimal due to the distance, and level difference between the two building. The proposal is not considered to constitute a negative effect on setting of the listed building due the limited intervisibility and views towards Royal Exchange across Bank Junction to the east remain uninterrupted. Accordingly, the proposals would have a neutral presence, and the setting and significance of No.1 Poultry would be preserved.

Guildhall Conservation Area

Significance

142. First designated in 1981, it is located at the centre of the City of London and shares a boundary with the Bank Conservation Area on the eastern side. The conservation area is rooted in the civic complex comprising the Guildhall and its associated buildings disposed about the Yard, and incorporates a hinterland of C18, C19 and C20 commercial buildings to the east and south. The street pattern, which has 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 processional route from the River Thames to the Guildhall Yard. Further interest is derived from the presence of the Georgian residential developments, associated with Robert and James Adam, within Frederick's

Place, which provide an appreciation of a mid-late-18th century perspective on the historic streetscene prior to the mass expansion of the City.

Setting

143. The conservation area boundaries are defined by Cheapside to the south, King Street, Lawrence Lane, Gresham Street and Aldermanbury in the west, Old Jewry and Coleman Street east side, part of Basinghall Street and the 15th century Guildhall. Owing to the dense, urban character beyond the conservation area boundary, views beyond its immediate context are limited, though the main lateral vistas along Gresham Street, eastwards towards the Eastern Cluster. To the south, the conservation area borders the Bank Conservation Area, with the two having a close visual and functional relationship. There are significant views in and out of the area, such as those towards Tivoli corner as well as those along Old Jewry and within Frederick's Place. These illustrate the historical evolution of the City, including its former residential context of the 19th century. 1 Old Jewry while maintaining the sense of scale and grain prevailing along the eastern boarder of the Conservation Area does not specifically contribute towards significance and is a neutral element to its setting.

Impact

144. A key point of contention raised by the third party representations has been the bulk and massing of the pavilion alongside its modern architectural language, as previously stated officers have come to a different view as there would be limited intervisibility from within the public realm of the Conservation Area.

145. The Conservation Area is located directly to the west of the proposal site. The proposal would increase the overall height and massing of the building by a two-storey set back extension and roof terrace with a 1400mm balustrade. The bulk of the pavilion would have limited visual impact on the Conservation Area and would only be seen incidentally as fleeting presence from Old Jewry and Frederick's Place. When considered against conservation area as a whole, it is considered that the impact on setting would be limited, incidental and not detrimental to the setting, character, appearance or significance of the conservation area.

<u>Wider Indirect Impacts on Heritage Assets:</u>

146. Officers have also assessed the impact of the scheme on other nearby designated heritage assets. These are as follows:

- No.35 Old Jewry – Grade II
- No.3,4,6,7 and 8 Frederick's Place – Grade II (separately listed)

147. No perceptible impact, given that the views of the listed buildings are only glimpsed together in fleeting localised views. Officers consider that their special architectural and historic interest and setting would be preserved.

Conclusion on Heritage

148. The proposals will create a minimal visual change to the elevation and roofscape when viewed from the public realm. The rooftop pavilion is set back from the building line and is only glimpsed in obliqued momentary views in and around the Bank Conservation Area and surrounding heritage assets. There would be no harm to the character and appearance of the Bank Conservation Area and setting of the surrounding designated heritage assets and accordingly the proposed development would comply with Local Plan policies DM10.1, CS12, and DM12.1 and DM12.2.

Access and Inclusion

Policy Context

149. Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.

150. Local Plan policy DM 10.8 requires proposals “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.

Entrance

151. The proposed changes to the primary office entrance would replace the existing revolving door with a recessed barrel door. Improving the inclusivity of the primary entrance by removing the undue separation created by revolving doors, in line with D5 3.5.9 of the London Plan and DM10.8 of CoL Local Plan.

152. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2. Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details will be secured by condition.

153. Security barriers between the reception and main core would feature at least one barrier in each location with a minimum clear-opening width of 1000mm.

Cycle and End of Trip Facilities

154. The long and short stay cycle parking would be accommodated within the basement and would be accessed via Old Jewry. The internal access to the cycle store is via a cycle lift which opens directly into the basement cycle store providing step free access.

155. A minimum of two spaces which can accommodate larger accessible cycles will be provided. Dedicated male, female and accessible changing facilities will be provided within close proximity of the bike store. Full details of the cycle stand types and the setting out of the bike store, and end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.

Vertical Movement

156. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure. There is one firefighting and EVAC lift which will serve ground level to 9th floor level.

Horizontal Movement

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

Amenity Terrace

158. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.

159. The landscape layout will be conditioned to ensure that it is welcoming and inclusive for a wide range of users and provides a variety of seating options for a range of people including handrails, backrests, and sufficient contrasts.

160. The terrace doors should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via condition.

Sanitary Facilities

161. It is confirmed that an accessible toilet will be provided at ground floor in close proximity of the reception area.

162. A mixture of left- and right-hand transfer options should be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

Conclusion on Access and Inclusion

163. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the proposed office use to fulfil its goal of being an inclusive and welcoming place to work, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the primary entrance, end of trip facilities and the design of the new amenity terrace in order to secure the optimal solution for the greatest range of building users. Subject to further design details which will be secured by condition, it is considered that the proposal accords with the access related policies outlined above.

Archaeology

164. Policy DM12.4 of the Local Plan 2015 and Policy HE2 of the emerging City Plan 2040 outline the requirements with regards to archaeology, that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.

165. An Archaeological Desk-Based Assessment has been submitted with the application (MOLA 2024). The only areas of proposed below ground impact from the new development comprise a new lift pit and some drainage.

166. In March 2025, the applicant submitted a Written Scheme of Investigation (WSI) for Archaeological Excavation and Monitoring and Recording, MOLA 2025 which outlines how the archaeological mitigation will be managed on the site.

167. The Greater London Archaeological Advisory Service (GLAAS) has reviewed the information submitted and advised that the WSI is acceptable and recommended a compliance condition to allow the archaeological work to proceed.

168. Subject to the satisfaction of the compliance condition recommended by GLAAS, the proposals are considered to be in accordance with Policy DM12.4 and emerging Policy HE2.

Transportation and Highways

169. Strategic Policy CS16 of the Local Plan 2015 is relevant to transportation, it promotes improvements to the public transport capacity and the conditions of walking and cycling, Policy DM16.1 requires assessment to be submitted with applications for developments likely to have an effect on transport, Policy DM16.2 is relevant to pedestrian movements, Policy DM16.3 is relevant to cycle parking, Policy DM16.4 encourages active travel and Policy DM16.5 is relevant

to parking and servicing standards. Relevant policies of the emerging City Plan 2040 are Strategic Policy S8 and S9 and Policies VT1, VT2, VT3, S10, AT1, AT2 and AT3. The relevant London Plan 2021 policies relevant to transportation and highways are T1, T2, T3, T4, T5, T6, T6.2, T6.3, and T7.

170. The application creates additional office floorspace of 491 sqm by way of new build elements. It is proposed to enhance the cycling in journey and relocate the existing bike entrance from Grocers' Hall Court to Old Jewry with an access lift to the basement. In line with the existing planning conditions under planning permission 05/00182/FULL a minimum of 33 cycle parking spaces should be available on site. The applicant has stated that 45 cycle parking spaces are principally located in a small store as identified on the existing basement plan (33 spaces) with an additional 8 spaces provided beneath the suspended lift pits. The majority of the existing spaces would not meet the relevant standards and some are not considered to be practically useable given low head heights and accessibility.

171. In accordance with Policy T5 of the London Plan 2021, the proposed office uplift would require 7 long stay spaces and 1 short stay space. At least 2 supporting facilities per 3 long stay spaces and 1 shower facility per 10 long stay spaces should be provided. The proposed development creates 77 cycle parking spaces including 2 accessible spaces. Given that 45 spaces should be re-provided for the existing site, the proposals provide an addition of 32 cycle parking spaces, which is well in excess of the minimum requirements for the proposed uplift. Enhanced end-of-trip facilities with changing spaces would be located in the basement adjacent to the cycle parking offering 9 showers, of which 1 will be accessible, and 116 lockers. The initial submission was not in compliance with London Cycling Design Standards and amendments have been made by the applicant to meet them. In particular the applicant was requested to remove the fully vertical cycle parking spaces as there are not acceptable. A new submission was made on 7th June with a revised proposed basement plan showing semi-vertical spaces instead alongside Sheffield stands which is considered to be more appropriate for daily use. It is considered that the improved pedestrian experience and cycle facilities would encourage active travel. The proposals would therefore support active travel and comply with Local Plan Policies DM10.1, DM16.4 and emerging Policies S8 and S9. The proposed cycle parking provision is compliant with Policy T5 of the London Plan, in terms of the minimum number of spaces required these are being exceeded. To ensure that short term cycle parking spaces are used as intended, further details would be required under planning condition, including how visitors of the building can access and use them. A condition has also been recommended to ensure the cycle facilities would be provided for the lifetime of the development.

172. The delivery and servicing arrangement would maintain the existing situation, with access via Grocers' Hall Court. Due to the altered layout at ground, basement and upper levels a Delivery and Servicing Management Plan would be secured by condition. Environmental Health has also recommended time restrictions for servicing between 23:00 and 7:00 to safeguard the amenity of the adjoining premises and the rest of the area in general. These restrictions would be secured by planning condition.

173. Any demand arising for wheelchair accessible parking would be met via blue badge parking bays within close proximity to the site. The submitted Transport Assessment identifies the closer bay within 100m of the site.

174. Through Travel Plans, the applicant must monitor the demand for on-street disabled car parking spaces coming from their development, and encourage the use of the public transport through travel planning measures. Annual surveys to establish the mode of transport for all users of this development is required. The findings of the surveys to be compiled on a report, with measures to further support the use of the sustainable modes of transport.

175. A Construction Logistics Plan would be secured by condition to mitigate construction impacts on the highway network and this will also help the City Corporation ensure that any risks to cyclists and pedestrians are managed and mitigated during the construction period which is an area of concern that has been raised by objectors.

176. In addition, the CoL Transport Officer has requested a planning condition to be secured that requires the applicant to enter a Section 278 Agreement with the City Highways Authority for the reinstatement of the adjacent highways affected by the construction logistics arrangements. A condition has been recommended on that basis.

177. The proposals are considered acceptable in transport terms, provided the applicant complies with the recommended planning conditions.

Waste and Refuse

178. Local Plan Policies CS17 and DM17.1 require development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials, with waste facilities integrated into the design of the buildings.

179. Local Plan Policy DM16.5 states that an on-site servicing area 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. The emerging Policy CE1 is relevant to sustainable waste facilities and transport.

180. The City's Cleansing team has reviewed the details included in in Drawings No. 6982-SRAXX- B1-DR-A-02199 Rev P02 and 6982-SRA-XX-00-DR-A-20100

Rev P06 and as outlined in the Design and Assessment, Feb 23 and confirmed they are adequate for this proposal. As discussed above, the collection arrangement will remain as existing.

181. The proposed waste facilities and collection are considered to be acceptable.

Sustainability

182. As a minor development the scheme is not required to meet London Plan Policy SI2 requirements (scheme to be net zero-carbon, to include a detailed energy statement using the energy hierarchy framework, to calculate WLC emissions) or to follow CoL's Carbon Options Guidance. However, the submitted Sustainability and Energy Statement outlines how the design approach adopts similar principles and hierarchy methodology to inform and justify the development proposal.

183. Existing glass spandrels above the ground glazing will be replaced with stone spandrels and existing double-glazed units will be replaced with new openable double-glazed windows. The properties of the existing glass are considered unsuitable to match required properties for thermal comfort and energy efficiency and as such will be recycled/reused offsite instead.

184. London Plan Policy DM 15.1 requires BREEAM assessment for major developments only. However, the Sustainability Statement references a target for the Proposed Development which aligns with BREEAM credits: the office element of the scheme is targeting an 'Outstanding' BREEAM rating with a targeted score of 89.1%. Albeit there is no requirement for the post-completion certificate to be approved by the Local Planning Authority, this will be requested for information purposes only.

185. The proposed development seeks to enhance ecological value of the existing site within the loading limits of the existing structure. This will be achieved through features including the provision of a green roof garden at level 9, invertebrate habitat features, nectar-rich wildlife planting and species-specific boxes.

186. The proposed development currently demonstrates a total net increase of 105% in ecological value. A UGF score of 0.3 was considered unfeasible due to the highly confined nature of the site which features limited opportunities for greening at ground level. Notwithstanding this, the proposals have sought to maximise available roof and facade areas for planting to achieve a UGF score of 0.09.

187. It terms of Biodiversity Net Gain (BNG), it is noted that the planning application was submitted in March 2024, therefore before the BNG regulations became mandatory for minor development applications in April 2024. Even so the development site comprises a roof structure with no elements of greenery or habitat life, the site would be exempt from the BNG requirements as the site

would be below a de minimis threshold (i.e. development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m x 5m) of non-priority onsite habitat). The proposals increase urban greening on the roof through the addition of soft landscaping elements to be provided at either side of the pavilion structure and aside the new roof terrace seating.

188. The proposed scheme would result in significant carbon emission savings by reducing embodied carbon through large-scale retention of the existing building and reducing operational energy demand through upgrades to the exiting building fabric. The introduction of renewable energy measures would further help to contribute to energy savings. The proposals demonstrate the use of circular economy principles with the prioritisation of material re-use on-site and the exploration of off-site re-use potential where this is not possible. The proposed landscaping strategy would have a positive impact on biodiversity, whilst contributing to climate resilience.

189. Overall, the proposals indicate that the refurbishment and extension scheme would provide significant sustainability benefits compared to the existing building. The submitted documents demonstrate the effort and commitment to enhancing the sustainability of the building and reducing the risk of any adverse environmental impacts associated with the proposed development.

Amenity – Overlooking

190. Policy DM21.3 of the Local Plan 2015 and Policy HS3 of the emerging City Plan 2040 respectively require all developments to be designed to avoid or minimise overlooking and to seek to protect the privacy of the adjacent residential accommodation. However, the supporting text to the policies recognise that due to the density of the City, it may not always be possible to entirely avoid overlooking or other impacts on amenity.

191. Policy DM10.3 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040 seek to encourage roof terraces whilst protecting residential premises from immediate overlooking from terraces and other elevated open spaces such as roof gardens.

192. The planning system does not normally protect specific views from private properties but can consider whether a proposed development is intrusive, particularly to residential properties, due to the massing and proximity, and whether this would cause demonstrable harm to the amenity of that property. A view from a private property would only normally be protected where in the circumstances of the case it was in the public interest to do so.

193. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.

194. The application proposes a pavilion and a roof terrace. There are no immediate residential properties to the site. The nearest property is situated at 6 Frederick's Place towards the west.

195. The roof terrace would mainly occupy the south side of the roof which is situated at higher levels to the residential property with a considerable distance between them.

196. During the December 2024 consultation period, objections were received on the loss of privacy to the existing roof terrace at the neighbouring hotel (the Ned, 27 Poultry) to the east of the site arising from the creation of a new roof terrace to the application site and the erection of a pavilion building for the enjoyment of the office staff. The applicant subsequently submitted a set of updated plans regarding amendments to the roof level and the relevant elevations, which relate to the detailed design of the proposed pavilion and roof terrace. These amendments include the relocation of the previously proposed east door to the pavilion offering access to the eastern part of the roof terrace, to now being proposed at the west elevation. Other amendments involve the removal of benching on the eastern section of the roof terrace, the re-orientation of the southeastern landscaping plinth to face away from the Ned, and the introduction of planted screening to the east of the pavilion extension. The applicant considered these amendments and updates to the design not to be necessary or material for the acceptability of the proposals, but were made in order to respond to the concerns raised by the objectors regarding the loss of privacy of the hotel's roof level.

197. The above changes are welcomed. It is highlighted that hotels are not subject to the same privacy considerations as residential properties because they serve a different purpose but nevertheless regard has been had to the concerns raised about privacy and officers visited the Ned Hotel and Club (including the roof terraces and swimming pool) to understand the exact relationship between the buildings. As commercial establishments accommodating transient guests and club members, privacy concerns are less critical compared to long-term residential use. Planning policies that protect residential privacy are not applicable to hotels, which operate under different standards. When considering the scheme on this basis the proposed development is for additional office use and as such would, for the majority of the time, likely be used within typical working hours. This relationship between two adjacent commercial uses is very typical within the immediate context and the wider City, and the limited amount of overlooking from the commercial office to a transient hotel and members club use is not considered to be of such detriment that would justify a reason for refusal. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not, inter alia, immediately overlook residential premises. The proposal would allow for some potential limited views to both the neighbouring

hotel rooms and hotel/club roof terrace. That being said, the pavilion and terrace are laid out as such that the main external use would be primary adjacent the southern side of the building and there would be limited space for use either to the east or west of the pavilion area. While officers are cognisant that both the proposed pavilion fenestration and terrace would introduce additional potential for overlooking, this would be a modest addition to the existing mutual level of overlooking within the relationship between the two properties. The addition of such areas would therefore not exacerbate this level to such a significant degree as that it would be unacceptable in the surrounding context and as discussed above, this relationship between two adjacent commercial uses is very typical and is not considered to be inappropriate in this built up inner city location. This is particularly pertinent within the immediate locality as there are clear examples of existing terraces that overlook or are overlooked by surrounding commercial uses such as the terraces located at the Ned Hotel (approved under reference 13/01036/FULMAJ and subsequent applications), 1 Poultry (reference: 4616AG) and 100 Cheapside (reference: 12/00772/FULL).

198. No residential premises would be detrimentally impacted given the location and surrounding commercial uses.

199. It is therefore not considered that the proposed development would have an unacceptable impact in terms of overlooking to nearby residential properties. The proposal accords with Policies DM21.3, DM10.3 and emerging Policies HS3, DE4 on that basis. The relationship with the neighbouring building is considered acceptable and the changes made since the scheme was originally submitted are welcomed.

Amenity – Daylight Sunlight

200. 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.

201. 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.

202. Emerging Policy DE7 of City Plan 2040 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby other sensitive receptors, including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment’s guidelines.

203. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions

may not be practicable in densely developed city centre locations. Policy HS3 of the emerging City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

204. The immediate environs of the development site are predominantly characterized by commercial uses including the hotel and club use at the Ned. Given the scale of the proposed development, it is not anticipated that the development would have a detrimental impact on properties located further afield from the immediate surroundings.

205. The March 2024 submission was accompanied by a letter which states that Daylight and Sunlight assessment would not be required for this application given the lack of proximity to residential occupiers as discussed above. Officers agreed with this approach. With the re-opening of the application in December 2024, the applicant submitted a Daylight and Sunlight Report and an Overshadowing Assessment prepared by Point 2 which are now taken into consideration and discussed in the following paragraphs.

206. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required however the guidance states that it "may also be applied to any existing non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices". The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight.

207. In light of the above, Officers are cognisant that the majority of surrounding properties contain offices, or similar uses, and as such the requirement for these properties is somewhat lesser in comparison to the needs of a private residential property. The dense urban environment of the City is such that the juxtaposition of commercial office buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial office buildings in such locations often require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. This is typical within other approvals both within the immediate vicinity and the wider City and as such these specific surrounding commercial premises are not considered to be subject to the same daylight/sunlight test requirements as residential properties.

208. Officers note that the there is a hotel and members club located within an adjacent building (the 'Ned Hotel') and this use would potentially have a reasonable expectation of daylight as per the BRE Guidelines. Considering that the proposed development includes development above the existing roof level

this would therefore increase the level of massing and form within the immediate area, potentially to the detriment to the hotel. The proposed development however has been designed as such to be set back from the main elevations of the building to be read as a subservient addition, which in turn would reduce the potential impact on its surrounding properties. The existing relationship is such that the majority of the western facing hotel rooms and windows from ground floor up would only be separated from the 50m high application building by Grocer's Hall Court which is approximately only 6m wide. This incredibly compact and unyielding relationship between the properties is symptomatic of the historic layout of the City (including the fact that many buildings are built right up to their site boundaries) and as such Officers consider that there is likely already to be existing impacts on both properties given the close-quarter relationship, particularly at lower levels where there would be low levels of daylight. While the proposal would introduce mass at roof level, given the separation distance Officers consider that the majority of windows would likely already suffer low levels of light or would have an oblique relationship to mass at roof level regardless. At upper floors the proposal would likely have more of an impact on windows and rooms that face this property however this would be a modest number when considering the neighbouring site as whole. Furthermore, given that this neighbour is not residential in nature, the requirement for daylight is lessened as apparent by the existing rooms which already have low daylight level. Finally, the modest impact to the neighbouring site is also considered acceptable on the basis that this relationship has been approved elsewhere within the immediate vicinity, for example at Princes Court (reference: 22/00158/FULMAJ), and as such not out of keeping with the immediate locality.

209. With regard to the roof top terrace for the member club, similar to the above, this would likely be impacted by the development in terms of daylight however given the more subservient design of the extension being set back this impact would be somewhat modest. Furthermore, this terrace would be commercial in nature (i.e. non residential) and still benefit from good levels of daylight given its roof top location. Officers consider that the level of area impacted would be modest when considering the roof terrace and members club as a whole which stretches a good percentage of the existing roofscape of the building and as such the proposal is considered acceptable on this basis. Officers note that the supporting text of Policy DM 10.7 (Daylight and sunlight) states that the amount of daylight and sunlight received has an important effect on the general amenity of dwellings, the appearance and enjoyment of open spaces and streets, and the energy efficiency of all buildings. However, the glossary of the Local Plan especially details open space as "Land which is not built on" and as such the terrace/roof of a property would not fall under this category.

210. Despite the above, the submitted Daylight and Sunlight report has considered the building to the east side of the application site, the Ned Hotel at 27 Poultry, for daylight and sunlight assessment.

211. For background information, it is noted that daylight impacts are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied. In addition sunlight impacts are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms. Lastly, overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

212. The hotel is arranged over 8 floors. The site facing elevation of the hotel building is considered to be the secondary face of the hotel located at Grocers' Hall Court which is a narrow side street. The report takes into account the surrounding built environment and states that it cannot be considered that there is an expectation of good daylight levels to the hotel rooms given the existing, close-knit arrangement.

213. The daylight assessment considered seventy windows serving thirty rooms, including bedrooms and a kitchen. Of these, sixty-seven windows and thirty rooms experienced no noticeable alterations to Vertical Sky Component (VSC) or No Sky Line (NSL), with changes of less than 20%. Three windows showed minor reductions in VSC, notably in bedroom R6/116 on the sixth floor, where windows W6/116 and W7/116 experienced reductions of 29.7% and 29.2%, respectively. The existing VSC values for both windows is 24.8% and with the proposed development in place a VSC of 17.7% and 17.6% would be achieved, respectively, which equals to a 7.4 and 7.2 absolute loss. These reductions, though noticeable and material, are relatively minor and typical for this area of the City in the context of the urban environment and relationship between properties described above. After the development, these windows will retain a residual VSC of approximately 17.5%, which remains a good level of light for a hotel in the context and compared to the existing low levels of daylight available to this elevation windows of the building.

214. Additionally, window W5/114, serving bedroom R4/144 on the fourth floor, experienced a minor reduction in VSC (22.3%), with existing light levels already

very low at 5.9%. The existing low levels to that window is attributed to the location of the window next to an existing projecting structure that inhibits light entering into the room. Whist the BRE guidelines advise that the change would be noticeable the small percentage point reduction (1.3%) does not significantly alter the light levels in the room. The one noticeable NSL reduction occurred in room R4/114, being served by the above window, where the reduction was 29.2%. However, this room already experiences low daylight levels, as mentioned above, and the relative reduction whilst noticeable is minor in the context of the existing conditions and when taking account of the hotel use.

215. It is therefore evidenced that from all the windows assessed, three windows and one room would fail to meet BRE guidelines. However, the one room and one window already experience very low levels of daylight and as such any alteration would affect the daylight values but would not be noticeable in real life. The two other windows impacted retain daylight values after the proposed development is implemented which would be considered good within the context of the City, where much lower daylight values are normally experienced.

216. The assessment further indicates that the affected windows are in close proximity to the development site, and the low existing light levels suggest that there is limited expectation of daylight in these rooms. While the reductions in daylight are more pronounced in percentage terms due to the low existing light levels, the overall impact remains minor.

217. In terms of sunlight, the assessment confirms that all six rooms with windows oriented within 90 degrees of due south meet the BRE recommendations and experience no reduction in sunlight as a result of the proposed development.

218. The submitted Overshadowing Assessment further demonstrates that the three external spaces of the neighbouring hotel, all currently enjoy 2 hours of more of direct sunlight to greater than 50% of their area. The assessment does not identify any changes to direct sunlight received to these areas after the implementation of the proposed development.

219. No other properties, other than the neighbouring hotel to the east of the site have been identified for assessment in the submitted reports. Given that the submitted reports were not required to make an informed assessment and draw conclusions on the daylight and sunlight impact from the proposed development for the reasons mentioned above, this is an acceptable approach. In terms of overbearing impacts and the assessment of whether the proposal is considered to increase a sense of enclosure the proposal is considered acceptable by Officers. The proposed rooftop pavilion structure is not considered to create a sense of overbearing given its set back position on the roof and its subordinate scale to the host building. The proposed development at roof level is set away from neighbouring properties and furthermore the surrounding highway network would add additional separation. While the proposal would inevitably add bulk

and massing at roof level this is not considered to cause an unacceptable level of detrimental overbearing or sense of enclosure in the context of the inner city location.

220. Equally in terms of outlook, similar to the above, whilst the outlook from some parts of the roof terraces at the Ned Hotel would change, given its design and the proposed subserviency of the rooftop extension the proposal is not considered to cause to have an unacceptable detrimental impact to the outlook of neighbouring commercial occupiers. Officers are cognisant that objections have been received from neighbouring commercial occupiers, notably the adjacent Ned Hotel and their members, however given the scale of the proposal and the surrounding commercial setting the proposal is considered acceptable on this basis. Whilst it is not the function of the planning system to protect private rights as private rights, or simply because they are private rights, case law makes it clear that the converse is not correct either and that the fact that there is, absent a covenant, no private right to a view over another's land, does not mean that it is irrelevant in planning considerations either *(Watton V Cornwall Council [2023] EWCH 2436 (Admin)*. Whilst that case considered residential amenity it is noted that the Court found that it was for the local planning authority to consider if there is a public interest in the protection of a view or outlook currently enjoyed by an occupier. When considering the impact of the extension on the views out of the roof top terrace at the Ned Hotel and Club, officers do not think that it is necessary in the public interest to protect the view from a single property in these circumstances which concern the relationship between two commercial developments, in the inner city context when taking into account of the nature of the surrounding built environment and the scale of the development proposed.

221. Officers consider that the proposed extensions would not unduly compromise the business function of the adjacent commercial properties and, with particular regard to the Ned Hotel, any such impact would be limited to a small proportion of the overall Members Club use that spans the majority of the roofscape.

222. In conclusion, the proposed development has been carefully assessed against relevant policies, including Policy D6(d) of the London Plan, Local Plan Policy DM10.7, and emerging Policy DE7 of the City Plan 2040. The submitted Daylight and Sunlight Report demonstrates that the majority of impacts are minimal, with only minor reductions in daylight levels to a few windows, which are typical in the urban environment described above. The commercial context of the site, along with the low existing daylight levels at the adjacent Ned Hotel, further reduces the significance of the impact. Given the minor impact on daylight and sunlight to a small number of rooms, the proposal is considered to result in daylight and sunlight to the hotel which is appropriate in the context and the development will allow acceptable standards of daylight and sunlight to be retained. Accordingly the development would not result in unacceptable

daylight and sunlight impacts to the neighbouring buildings that would warrant the refusal of this application.

Amenity – Noise and Disturbance

223. London Plan Policy D13 requires the proposed development to mitigate noise generating uses and Policy D14 aims to avoid significant adverse impacts on health and quality of life, and Local Plan Policies DM15.7 and Policies S1 and HL3 of the emerging City Plan 2040 seek to ensure that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.

224. The impact of the proposed development in terms of noise associated with the operational stage of the development would be linked to the use of the roof terrace and the proposed plant room at roof level. The terrace would provide amenity for office workers and their use would be appropriately limited by conditions. The proposal has been reviewed by Environmental Health in respect of amenity to nearby occupiers who raised no objection subject to a series of conditions to mitigate against noise and disturbance impacts to the receptors. These include conditions that restrict the hours of access of the terrace, prevention of the use of amplified music and the prevention of promoted events. In terms of the noise emitted from the new plant room a condition has been recommended. Subject to the condition being satisfied the proposed plant is not considered to result in an unacceptable impact in terms of noise.

225. A condition is also proposed to protect the amenity of nearby occupiers during construction.

226. Subject to the recommended conditions by Environmental Health, the development should not detrimentally impact the amenity of surrounding occupiers in respect of noise and disturbance. Therefore the proposed development complies with London Plan Policies D13 and D14 and Local Plan Policies DM15.7 and emerging Policies S1 and HL3.

Air Quality

227. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

228. The initial proposal did not include all the information required to assess the application and further information was requested by Officers. An updated Air

Quality Assessment was issued on 10th April which was reviewed by Environmental Health in respect of air quality who raised no objection to the proposal subject to a condition and an informative being attached to decision. It is therefore considered that the proposed development, subject to condition being satisfied, complies with Strategic Policy CS15 and emerging Policy DE1 and HL2.

Community Engagement

229. The City's Statement of Community Involvement (July 2024) and Developer Engagement Guidance (May 2023) aims to guide applicants and developers to communicate and engage positively and meaningfully with the City's communities and stakeholders.

230. Whilst pre-application guidance was given advising that a statement of community involvement should be submitted with the application and this is always encouraged, the City's Validation Checklist February 2016 states that a Statement of Community Involvement is only required for new buildings, major changes of use or major extensions. This application is considered by officers to be a minor extension and is not considered to fall into these categories, and as such this application would not trigger this requirement. It is also noted that the table at paragraph 5.5 of the City's Developer Engagement Guidance suggests methods of communication for different scales of development. For non-major development (which this is) a number of methods of communication are suggested where the impact of the proposal or impact of construction would have a significant impact on stakeholders. It is not considered that this application falls into that category.

231. While the City's SCI and Engagement Guidance do encourage applicants to discuss proposed schemes with neighbouring occupiers, and this is normally detailed at pre-application stage, this is not a statutory requirement given the scale of the scheme. That being said the non-submission of a SCI with the initial application was an issue raised by the Claimant in the judicial review proceedings who were concerned about the impact on their building and that they hadn't been consulted or engaged. Whilst neither the City Corporation or the applicant accepted the submission of a SCI was either a legal requirement or needed to make the application valid, the applicant has submitted an Engagement Statement during the application process which details a timeline of discussions with neighbouring occupiers. This is welcomed. The submitted documentation shows that interested parties have been meaningfully engaged and as such were afforded the opportunity to discuss the proposal to Officers satisfaction.

232. Furthermore, the statutory consultation and notification requirements have been carried out in accordance with the relevant requirements (i.e. Regulation 5A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990

and The Town and Country Planning (Development Management Procedure) (England) Order 2015).

Suicide Prevention

233. Local Plan 2015 policy CS3 requires that security and safety measures are of an appropriate high quality design. The City Corporation has adopted the Planning Advice 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.

234. The proposal incorporates railings that run along the perimeter of the terrace. The balustrading of the new roof terrace has been designed with suicide prevention in mind and would be a minimum of 1.4m high and set back from the building edge by over 700mm. The proposal seeks to provide external furniture within the terrace area and these have been designed to be placed away from the edges to prevent any misuse. Furthermore, the stepped pattern of the top of the building works as a prevention measure itself as there are projecting structures/terraces at seventh and fifth floors below the new roof terrace, which act as a prevention mechanism from falling and deterrent. Officers consider that the balustrading has the potential to include further consideration on suicide prevention measures in more exposed corners of the roof that have a shear drop, such as the southeast corner and as such a condition is proposed to secure these finer details. It is also noted that the roof terrace would not be accessible by members of the public, and would support a managed access, including the use of CCTV. The terrace would be closed outside of operational hours with no access available during these times.

235. The proposed development has considered the prevention measures in line with the City's Preventing Suicides in High Rise Buildings and Structures Planning Advice Note. Full details would be secured by design conditions, including the design of the balustrade and landscaping, and a suicide prevention condition is proposed to ensure that any arrangements and management plan would comply with the City's Planning Advice Note and be secured into perpetuity. The proposal is therefore considered to be acceptable on this basis.

Fire Safety

236. London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest stage. The submitted materials include details of various fire safety measures including fire-fighting lifts, fire-fighting Access (Secondary Cycle Entrance), fire rated battery chargers, a fire-fighting lobby and smoke vents. While the proposal is for a

modest extension to an existing property, which has its own current fire strategy, a condition is proposed securing an up-to-date strategy.

237. The applicant is also however remined that the Building Regulations 2010 legislation covers the construction and extension of buildings and these regulations are support by Approved Documents. Approved Documents B addresses fire safety precautions which must be adhered to, to ensure the safety of occupiers.

Solar Glare

238. Policy D8 of the London Plan, Local Plan policy DM10.1 and emerging City Plan 2040 policy DE8 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

239. The application represents a development that includes a modest extension at roof level and the replacement of existing fenestration and as such a development of this scale is not considered to cause detrimental solar glare issues. It is considered that due to the design of the building, with vertical rather than sloped, convex or concave facades, the impacts from solar glare or convergence would be limited. Furthermore, the facades of the building are not made of primarily large areas of reflective glass. The elevational design of the building is such that there is a balance between the glazed and bricked/solid elements.

240. For the aforementioned reasons, it is considered that the no further assessment of the solar glare impacts of the development is required, as these are expected to be minimal and as such considered acceptable by Officers.

Wind Microclimate

241. Policies DM10.1 of the Local Plan 2015, Policy S8 of the emerging City Plan 2040 and Policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of the development should avoid unacceptable wind conditions.

242. In terms of the proposed development the main physical alterations of the proposal relate to the ground floor amendments and the proposed addition of a rooftop extension. Given that the proposed ground floor elements mainly relate to modest shopfront or office lobby entrance appearances the proposal is not considered to cause any additional wind issues at ground floor to the point it would be considered detrimental. Equally, the roof extension is set subserviently within the existing roof scape and is modest in size so given this the proposal is not considered to cause any additional wind issues to the point it would be considered detrimental to surrounding occupiers or highways users.

Section 106 and CIL

243. A S106 agreement is not required for this application.

244. Mayoral and City CIL applies to developments where there is an uplift in Gross Internal Area (GIA) of at least 100sqm or creation of one or more dwellings. Social housing, and development for charities for charitable purposes, are offered relief or are exempt from the levy. Education and Health related developments are charged at a nil rate. In the case of MCIL2 a rate of £80 per sqm is applied to eligible developments however, as the City is located within the Central Activity Zone (CAZ), differential rates apply to office, retail and hotel developments and are set at £185, £165 and £140 respectively. City CIL is also set at differential rates for riverside residential £150 per sqm and £95 per sqm for 'Rest of City' residential and £75 for offices and all other uses.

245. MCIL2 has been calculated to be £41,945 (excl. indexation) and the City CIL is £36,900 (excl. indexation) based on the uplift in floorspace of 491sqm (GIA).

246. In accordance with the CIL regulations the City Corporation would retain 4% of MCIL2 and 5% of the City CIL for its expenses associated with administrating City CIL and Mayor of London CIL.

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

247. The City, as a public authority must, in exercise of its functions, have due to regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

248. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.

249. 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.

250. It is the view of officers that a decision to grant permission subject to appropriate conditions, would not disadvantage those who are protected under the Equality Act 2010. The proposed development would reduce barriers to access for disabled people through the provision of an enhanced office main entrance, a relocated and improved bike entrance in terms of access and wayfinding, accessible toilets and shower facilities and more legible and open shopfronts. As noted above in this report, final details of some design features have been

secured by condition to ensure that the final design is satisfactory and achieves equality of opportunity.

251. For the reasons set out above officers consider that overall the proposal would have a positive impact on Protected Characteristics. Any potential negative impacts that could arise through construction and operation would be managed by the recommended conditions.

252. In relation to policy GG1 of the London Plan, the proposals are considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender reassignment, pregnancy and maternity, marital status, race, religion or beliefs, sex and sexual orientation, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

253. 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)).

254. It is the view of the officers that there would be no infringement of the ECHR.

Conclusion

255. The proposed development has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance including SPDs and SPGs, the NPPF, the emerging City Plan 2040 and considering all other material considerations.

256. The proposed development would provide ancillary floor space and a roof terrace to the existing office building, thereby creating a more welcoming and efficient use of office space. While the proposed development would result in a limited loss of retail, contrary to Local Plan 2015 Policy DM20.1 and emerging Policy RE1, the enhanced reprovision of a more legible shop front would align with the aspirations of the Principal Shopping Centre requirements.

257. The proposed development is considered to be a high-quality design and is not considered to cause harm to any surrounding heritage assets. The proposed development would not result in an unacceptable impact on neighbouring amenity, subject to imposition of conditions in respect of the use of the roof terrace and landscaping. In addition, the proposal exceeds the minimum requirements for cycle parking within the site and offers accessible end of trip facilities that are considered to improve the current conditions and are acceptable. The development will have a positive impact on accessibility, sustainability, urban greening and biodiversity.

258. The development is considered to comply with the development plan taken as a whole, and other material considerations including the NPPF and emerging

City Plan 2040 also support the grant of the permission in this instance. Accordingly, the proposals are recommended for approval subject to the imposition of conditions.

Appendix A

Background papers:

Covering letter, Agent, 20th February 2024;
CIL form, revised sent on 7th June;
Air Quality Assessment (ref: 34345-HML-ZZ-XX-RP-U-820001, P03), prepared by Hilson Moran, 10th April 2024;
Archaeological Assessment, prepared by MOLA, January 2024;
Sustainability Statement (ref: XX-HML-XX-XX-RP-V-79008,P02), prepared by Hilson Moran, 19th February 2024;
Energy Strategy (ref: XX-HML-XX-XX-RP-V-80002, P02), prepared by Hilson Moran, 21st March 2024;
Daylight and Sunlight Amenity Letter, prepared by Point 2, 18th January 2024;
Design and Access Statement, prepared by Sheppard Robson;
Heritage Statement, prepared by Montague Evans;
Ecological Appraisal (ref: 34345-HML-XX-XX-RP-U-590001, P03), prepared by Hilson Moran, 9th February 2024;
Planning Statement, prepared by Savills;
Noise Assessment (ref: 34345-HML-XX-XX-RP-O-500002, P03), prepared by Hilson Moran, 12th February 2024;
Transport Statement (including Travel Plan, ref: 4345-HML-XX-XX-RP U-78001, P03), prepared by Hilson Moran, 12th February 2024;
Email in response to Air Quality Officer, Agent, 10th April 2024;
Historic England, Letter, 21st March 2024;
LLFA, Memo, 27th March 2024;
Thames Water, Email, 2nd April 2024,
Environmental Health, Memo, 3rd April 2024;
TfL (Infrastructure Protection), Email, 4th April 2024;
CAAC, Letter, 10th April 2024;
Air Quality Officer, Memo, 10th April 2024;
Transport, Email, 4th June 2024;
Planning Obligations, Letter, 7th June 2024;
Cleansing, Email, 11th June 2024;
Sustainability Officer, Letter, 21st June 2024;
Design and Access Statement – Access Door 27 June 2024;
GLAAS, Letter, 11th July 2024;
Design Officer, Letter, 11th July 2024;
Email with proposed office floorspace, agent, 10th July 2024;
Transport comments, Letter, 12th July 2024;
Overshadowing Assessment, prepared by Point 2, 18 October 2024;
Daylight Sunlight Report, prepared by Point 2, October 2024;
Addendum Letter, prepared by Savills, 5 December 2024; and
Engagement Statement, prepared by Savills, received on 13 December 2024;
Cleansing, Email, 14th December 2024;

Historic England, Letter, 17th December 2024;
Planning Obligations, Letter, 10th January 2025;
Savills, Submission of amendments, Email, 11 and 13 March 2025, including 6982-SRA-XX-XX-DS-A-029050 Rev P03 – Privacy Screening Pack;
Cover Letter, Savills, 13 March 2025;
CAAC Letter, 19th April 2025;
Transport Officer, Email, 12th May 2025.

Public Representations

07/01/2025	Ankush Khanna	Email	Objection
07/01/2025	Anonymous by request	Email	Objection
09/01/2025	Dan Zaum	Email	Objection
11/01/2025	Akiko Takashima	Email	Objection
14/01/2025	Laurence Bain	Email	Neutral
23/01/2025	Farrer & Co (on behalf of Vivas Invest & Finance Limited)	Email	Objection
23/01/2025	The Lutyens Trust	Email	Objection
23/01/2025	MVHC Ltd (on behalf of Vivas Invest & Finance Limited and Poultry Tenant Limited)	Email	Objection
25/01/2025	Stuart Adolph	Email	Objection
27/01/2025	The Yucaipa Companies (on behalf of Soho House)	Email	Objection
28/01/2025	Douglas Marvin	Email	Objection
27/01/2025	The Ned (on behalf of Poultry Opco Limited)	Email	Objection
12/05/2025	Mr Benjamin Peacock	Email	Objection
13/05/2025	Farrer & Co (on behalf of Vivas Invest & Finance Limited)	Email	Objection

Consultees Responded

External list

21/03/2024	Historic England
02/04/2024	Thames Water
04/04/2024	Transport For London

10/04/2024	City of London Conservation Area Advisory Committee
11/07/2024	Historic England - GLAAS
17/12/2024	Historic England
03/01/2025	Transport For London
25/03/2025	Historic England
19/04/2025	City of London Conservation Area Advisory Committee

Internal list

27/03/2024	Lead Local Flood Authority
04/04/2024	Environmental Health
10/04/2024	Air Quality
04/06/2024	Transport
11/06/2024	Planning Obligations
11/06/2024	Community Facilities Manager (Public Conveniences)
27/06/2024	Sustainability
12/07/2024	Transport
18/12/2024	Environmental Health
09/01/2025	Planning Obligations
03/03/2025	Planning Obligations
21/03/2025	Environmental Health
12/05/2025	Transport

Appendix B

Relevant London Plan Policies

Policy GG1 Building Strong and Inclusive Communities

Policy GG2 Making the best use of land

Policy GG3 Creating a Healthy City

Policy GG5 Growing a good economy

Policy GG6 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 D11 Safety, security and resilience to emergency

Policy D14 Noise

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E9 Retail, markets and hot food takeaways

Policy E10 Visitor infrastructure

Policy HC1 Heritage conservation and growth

Policy HC2 World Heritage Sites

Policy HC3 Strategic and Local Views

Policy G5 Urban Policy G6 Biodiversity and access to nature Greening

Policy G7 Trees and woodlands

Policy SI1 Improving air quality

Policy SI2 Minimising greenhouse gas emissions

Policy SI4 Managing heat risk

Policy SI5 Water Infrastructure

Policy SI7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SL13 Sustainable drainage

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car Parking

Policy T7 Deliveries, servicing and construction

Relevant GLA Supplementary Planning

Accessible London: Achieving an Inclusive Environment SPG (October 2014)

Planning for Equality and Diversity in London SPG (October 2007)

Control of Dust and Emissions during Construction and Demolition SPG (September 2014)

Sustainable Design and Construction (September 2014)

Sustainable Transport, Walking and Cycling LPG (November 2022)

Mayoral CIL 2 Charging Schedule (April 2019)

Central Activities Zone (March 2016)

Mayor's Transport Strategy (2018)

Relevant Emerging City Plan 2040 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retail and active frontages

RE1 Principal Shopping Centres

RE2 Active frontages

S7 Smart Infrastructure and Utilities

Policy IN1 Infrastructure provision and connection

S8 Design

DE1 Sustainable Design

DE2 Design Quality

DE4 Terraces and Elevated Public Spaces

DE5 Shopfronts

DE7 Daylight and sunlight

DE8 Lighting

S9 Transport and Servicing

VT1 The impacts of development on transport

VT2 Freight and servicing

Policy VT3 Vehicle Parking

S10 Active travel and healthy streets

AT1 Pedestrian movement, permeability and wayfinding

AT2 Active travel including cycling

AT3 Cycle parking

S11 Historic environment

HE1 Managing change to the historic environment

HE2 Ancient monuments and archaeology

S13 Protected Views

S14 Open spaces and green infrastructure

OS2 Urban greening

OS3 Biodiversity

S15 Climate resilience and flood risk

CR1 Overheating and Urban Heat Island effect

CR3 Sustainable drainage systems (SuDS)

S16 Circular economy and waste

S26 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017)

Lighting SPD, October 2023

Developer Engagement Guidance PAN, May 2023

Preventing suicides in high rise buildings and structures PAN, November 2022

Sunlight PAN, July 2017

Archaeology in the City PAN

Archaeology and Development Guidance SPD, July 2017

Freight and Servicing SPD February 2018

Office Use SPD, January 2015

Planning Obligations SPD 2021

City Transport Strategy October 2024

Relevant Local Plan 2015 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, by:

1. *Increasing the City's office floorspace stock by 1,150,000m2 gross during the period 2011–2026 to meet the needs of projected long term economic and employment growth, phased as follows: 2011 – 2016: 650,000m2 2016 – 2021: 250,000m2 2021 – 2026: 250,000m2*

   A pipeline of at least 750,000m2 gross office floorspace with planning permission but not yet commenced will be maintained to provide office occupier choice.

2. *Encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers, protecting potential large office sites from piecemeal development and resisting development that would jeopardise the future assembly and delivery of large sites.*

3. *Encouraging the supply of a range of high quality office accommodation to meet the varied needs of City office occupiers.*

4. *Promoting inward investment and encouraging developers and businesses to invest and locate in the City.*

5. *Protecting existing office accommodation where there are strong economic reasons why the loss of offices would be inappropriate, including losses that would prejudice the primary business function of the City, and the variety of accommodation required by the business City.*

6. *Managing short-term over supply in the office market through a flexible approach to alternative temporary uses for vacant offices and sites, where such uses would not prejudice the eventual return of the site to office use.*

CS10 Promote high quality environment

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

1. *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.*
2. *Encouraging design solutions that make effective use of limited land resources.*
3. *Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.*
4. *Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of disabled people.*
5. *Ensuring that new development respects and maintains the City's characteristic network of streets and alleyways.*
6. *Delivering improvement in the environment, amenities and enjoyment of open spaces, play areas, streets, lanes and alleys through schemes in accordance with public realm enhancement strategies.*
7. *Ensuring that signs and advertisements respect the restrained character of the City.*

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, by:

1. *Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.*
2. *Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them.*
3. *Protecting and promoting the evaluation and assessment of the City's ancient monuments and archaeological remains and their settings, including the interpretation and publication of results of archaeological investigations.*
4. *Safeguarding the character and setting of the City's gardens of special historic interest.*
5. *Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.*

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, by:

1. *Requiring all redevelopment proposals to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and "end of life" phases of development. Proposals for major development should aim to achieve a BREEAM rating of "excellent" or "outstanding". Residential development should aim to achieve a minimum standard of Code for Sustainable Homes level 4, rising to level 6 by 2016 or in line with government targets.*
2. *Requiring development to minimise carbon emissions and contribute to a City wide reduction in emissions:*
    - *(i) adopting energy-efficiency measures;*
    - *(ii) enabling the use of decentralised energy, including the safeguarded Citigen Combined Cooling Heating and Power (CCHP) network, CCHP-ready designs in areas where CCHP networks are not yet available, and localised renewable energy technologies;*
    - *(iii) adopting offsetting measures to achieve the Government's zero carbon targets for buildings.*
3. *Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.*
4. *Requiring development to positively address:*
    - *(i) local air quality, particularly nitrogen dioxide and particulates PM10 (the City's Air Quality Management Area pollutants)*
    - *(ii) protection of the City's quiet areas and quiet times of day for businesses (daytime) and residents (night time);*
    - *(iii) the need to limit the City's contribution to light spillage and 'sky glow';*
    - *(iv) water quality and flood risk particularly in areas at risk of sewer flooding;*
    - *(v) land contamination, ensuring development does not result in contaminated land;*
    - *(vi) the need to enhance biodiversity and provide for its conservation and enhancement, particularly for the City's flagship species and the City's priority habitats (urban green spaces, churchyards and cemeteries, built structures and the tidal Thames).*

5. *Incorporating climate change adaptation measures into development and the City's infrastructure, including street scene, transport and utility infrastructure, social and emergency infrastructure, and heritage assets, having regard to the need to protect their historic significance.*

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) by:

1. *Enabling waste minimisation and adherence to the waste hierarchy:*
    - *(i) requiring the provision of facilities for waste segregation, handling and management within new developments;*
    - *(ii) increasing the proportion of municipal solid waste recycled to at least 45% by 2015 in line with the City of London Waste Strategy;*
    - *(iii) promoting improved waste management choices for businesses and residents.*
2. *Enabling waste to be managed at the nearest available suitable location:*
    - *(i) identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with the London Borough of Bexley*
    - *(ii) safeguarding Walbrook Wharf as a waste handling site and investigating the potential for waste management, alongside its waste transfer function;*
    - *(iii) co-operating with other waste planning authorities to ensure appropriate waste management facilities are available to manage waste generated in the City.*
3. *Enabling the sustainable transport of materials including waste and recyclables by river:*
    - *(i) safeguarding Walbrook Wharf as a wharf suitable for river transport of materials including waste;*
    - *(ii) exploring the potential for further use of waterways for the transport of waste and construction materials subject, where appropriate, to the potential impact on Natura 2000 sites.*

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

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

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

DM 10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

- *the predominant use of the space, surrounding buildings and adjacent spaces;*
- *connections between spaces and the provision of pleasant walking routes;*
- *the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;*

- *the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;*
- *the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;*
- *sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;*
- *the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;*
- *the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;*
- *the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;*
- *the use of high quality street furniture to enhance and delineate the public realm;*
- *lighting which should be sensitively co-ordinated with the design of the scheme.*

DM10.5 Shopfronts

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

- *respect the quality and architectural contribution of any existing shopfront;*
- *respect the relationship between the shopfront, the building and its context;*
- *use high quality and sympathetic materials;*
- *include signage only in appropriate locations and in proportion to the shopfront;*
- *consider the impact of the installation of louvres, plant and access to refuse storage;*
- *incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;*
- *not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;*
- *resist external shutters and consider other measures required for security;*
- *consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;*

- *be designed to allow access by users, for example, incorporating level entrances and adequate door widths.*

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

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

DM12.1 Managing change affecting all heritage assets and spaces

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.*

Policy DM 12.2 Development in conservation areas

1. *Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.*
2. *The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.*
3. *Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.*

Policy DM 12.4 Ancient monuments and archaeology

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

DM15.1 Sustainability requirements

1. *Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.*
2. *For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:*

- *BREEAM or Code for Sustainable Homes pre-assessment;*
- *an energy statement in line with London Plan requirements;*
- *demonstration of climate change resilience measures.*

3. *BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.*
4. *Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.*
5. *Planning conditions will be used to ensure that Local Plan assessment targets are met.*

DM15.6 Air quality

1. *Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.*
2. *Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.*
3. *Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).*
4. *Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.*

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM16.1 Transport impacts of development

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

- *road dangers;*
- *pedestrian environment and movement;*
- *cycling infrastructure provision;*
- *public transport;*
- *the street network.*

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

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. *Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.*

2. *Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.*

3. *Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.*

4. *On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.*

5. *Coach parking facilities for hotels (use class C1) will not be permitted. 142 6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.*

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

DM17.1 Provision for waste

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

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

Policy DM 18.2 Sustainable drainage systems (SuDS)

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 and London Plan drainage hierarchy.*
2. *SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.*
3. *SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.*

DM19.2 Biodiversity and urban greening

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

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

DM20.1 Principal shopping centres

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

- maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
- the contribution the unit makes to the function and character of the PSC;
- the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food

takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

Policy DM 20.4 Retail unit sizes

1. *Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.*
2. *Major retail units (over 1,000m2) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.*

Policy DM 21.3 Residential environment

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

SCHEDULE

APPLICATION: 24/00226/FULL

1 Old Jewry London EC2R 8DN

The change of use of part the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.

CONDITIONS

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

   REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2. Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

   a) particulars and samples of the materials to be used on all external faces of the buildings including external ground and upper level surfaces;

   b) details of all elevations of the buildings including details of typical bays, the fenestration and entrances and upper floor extensions;

   c) details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;

   d) typical details of all office terrace doors;

   e) details of all ground floor elevations;

   f) details of windows;

   g) details of all soffits, hand rails and balustrades;

   h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;

i) details of new provision of sanitary facilities including the range of left- and right-hand transfer options;

j) details of plant, ductwork, ventilation and air-conditioning; and

k) details of the plant enclosure.

l) details of external lighting including light levels, temperature, tone and hours.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM 10.8, DM12.2 and emerging policies SE1, DE2, DE6, HL1 and HE1 of the Emerging City Plan 2040.

3. Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

   a) particulars and samples of the materials to be used on all external surfaces within the site boundary including hard and soft landscaping and materials;

   b) the position, size and types of planting;

   c) method of Irrigation including provision for harvesting rainwater run-off from surfaces to supplement irrigation;

   d) details of all soft landscaping including species and contribution to enhance biodiversity;

   e) Planters and seating;

   f) Contribution to biodiversity enhancement of all landscaping including greening, green walls and green roofs;

   g) Management and maintenance Plan (including ecological management) for all proposed landscaping to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.

   REASON: In the interests of visual amenity, access and inclusivity and to limit overlooking in accordance with the following policies of the Local Plan: DM10.1, DM10.8 and DM19.2.

4. Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 77 pedal cycles. A minimum of 2 no. of the cycle spaces shall be accessible for larger cycles including adaptive cycles for disabled people. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use

of the occupiers thereof and their visitors without charge to the individual end users of the parking.

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

5. Details of the short stay cycle parking and facilities linked to the cycle stores shall be submitted to and approved in writing by the Local Planning Authority, prior to the occupation of the building hereby permitted. Details should also include how visitors/customers of the office and retail units gain access to the cycle parking area and demonstrate that the bike lift fits the accessible cycles.

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

6. A minimum of 9 showers, including 1 accessible shower, 2 changing facilities, and 116 lockers shall be provided adjacent to the bicycle parking hereby approved, and these facilities shall be maintained throughout the lifetime of the building for the use of the occupiers in accordance with approved plans.

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

7. 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. The waste storage hereby approved shall comply with BS5906 specifications and all occupants of the development must have access and be required to use the waste storage and collection facilities.

   REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

8. Details of a Delivery and Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved by time to time by the Local Planning Authority) for the life of the development.

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

9. Prior to the commencement of any construction works, details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing. The details shall drafted in accordance with the Mayor of London's Construction Logistics Plan Guidance dated April 2021, 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. Traffic management drawings must accompany the document and be drafted in accordance with the "Safety at Streetworks and Road Works – A Code of Practice". No demolition or construction shall be carried out other than in accordance with approved details and methods.

   REASON: To ensure that demolition and construction works do not adversely impact public safety and the transport network, in accordance with London Plan Policy T7 and Local Plan policies DM15.6 and DM16.1. These details are required prior to the commencement of demolition and construction works to minimize the impact on the transport network from the start of these activities.

10. 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 (or any amended Travel Plan that may be approved from time to time by the Local Planning Authority) 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: DM16.1.

11. The development hereby permitted shall not commence until the following documents, in consultation with London Underground Limited (LUL), have been submitted to and approved in writing by the local planning authority which:

    a) accommodate the location of the existing London Underground structures and tunnels;

    b) accommodate ground movement arising from the development construction. The Ground Movement Assessment (GMA) should consider the temporary

and/or permanent changes in loading which may affect the London Underground structures and tunnels;

c) provide details on what impact the proposed load path and construction activities will have on LUL assets;

d) provide detailed design and Risk Assessment Method Statement for all demolition, temporary and permanent works;

e) mitigate the effects of noise and vibration arising from the adjoining railway operations;

f) no claims to be made against TfL or London Underground by the 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.

12. Following completion of the works, a BREEAM post-completion certificate shall be submitted to the Local Planning Authority for information purposes only.

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

13. Prior to the occupation of the roof terraces, details of suicide prevention measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. All development pursuant to this permission shall be carried out in accordance with the approved details and maintained 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 adequate safety measures are in place in accordance with Local Plan Policy CS3 and emerging draft City Plan 2040 Policy DE2 and DE4.

14. No live or recorded music that can be heard outside the premises shall be played.

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

15. 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.

16. The roof terraces hereby permitted shall not be used or accessed between the hours of 23.00 on one day and 08.00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

17. 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.

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

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

19. The proposed Class E development sharing a party element with office/non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the existing neighbouring premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall 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.

20. (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

    (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

    (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

    REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

21. 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.

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

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

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

Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

24. 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.

25. No demolition or development shall take place except in accordance with the submitted Written Scheme of Investigation (*Written Scheme of Investigation for Archaeological Excavation and Monitoring and Recording*, MOLA 2025). For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI.

    REASON: To safeguard the archaeological interest on this site in accordance with the following policy of the Local Plan: DM12.4.

26. Unless otherwise approved by the Local Planning Authority, the area marked ‘commercial’ on the ground floor plan (Ref. No. 6982 SRA XX 00 DR A 02200 Rev P02) hereby approved shall only be used for purposes falling within Class E (a) ‘display or retail sale of goods, other than hot food’ of the Town and Country Planning (Use Class) Order 1987 (as amended in 2020) and for no other purposes within Class E.

    REASON: To ensure that retail facilities are provided in accordance with Local Plan 2015 Policy DM 20.1.

27. All Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new

building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.

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

28. Prior to occupation, a Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be prepared by a suitably qualified professional and shall detail how the development proposals and the building meet the requirements of Policy D12 (part A) of the London Plan (2021).

    The development shall thereafter be implemented in accordance with the approved Fire Statement, unless otherwise approved by the Local Planning Authority.

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

29. No occupation of the site shall take place, unless and until the applicant has entered into a S278 Agreement with the City Corporation as Highways Authority (in accordance with the current S278 Agreement processes) for the reinstatement of the adjacent highways affected by the construction logistics arrangements.

    REASON: To mitigate construction impacts on the highway network, ensure that any risks to cyclists and pedestrians are managed and mitigated after the construction period and to ensure the satisfactory reinstatement of the highways, upon completion of construction work, in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

30. 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:

    6982-SRA-XX-XX-DR-A-02102 P01, Proposed Site Plan; 6982-SRA-XX-B2-DR-A-02198 P01, Proposed Sub-Basement Floor Plan; 6982-SRA-XX-B1-DR-A-02199 P02, Proposed Basement Floor Plan; 6982-SRA-XX-00-DR-A-02200 P02, Proposed Ground Floor Plan; 6982-SRA-XX-01-DR-A-02201 P02, Proposed First Floor Plan; 6982-SRA-XX-02-DR-A-02202 P01, Proposed Second Floor Plan; 6982-SRA-XX-03-DR-A-02203 P01, Proposed Third Floor Plan; 6982-SRA-XX-04-DR-A-02204 P01, Proposed Fourth Floor Plan; 6982-SRA-XX-05-DR-A-02205 P01, Proposed Fifth Floor Plan; 6982-SRA-XX-06-DR-A-02206 P01, Proposed Sixth Floor Plan; 6982-SRA-XX-07-DR-A-02207 P01, Proposed Seventh Floor Plan; 6982-SRA-XX08-DR-A-02208 P01, Proposed Eighth Floor Plan; 6982-SRA-XX-09-DR-A-02209 P02, Proposed Ninth Floor Plan; 6982-SRA-XX-10-DR-A-02210 P01, Proposed Pavillion Roof

(Tenth) Plan; 6982-SRA-XX-RF-DR-A-02211 P01, Proposed Plant Roof (Eleventh) Plan; 6982-SRA-XX-EN-DR-A-02400 P01, Proposed North Elevation; 6982-SRA-XX-EE-DR-A-02401 P02, Proposed East Elevation; 6982-SRA-XX-ES-DR-A-02402 P02, Proposed South Elevation; 6982-SRA-XX-EW-DRA-02403 P03, Proposed West Elevation; 6982-SRA-XX-ZZ-DR-A-02300 P01, Proposed Section AA; 6982-SRA-XX-ZZ-DR-A-02301 P01, Proposed Section CC; 6982-SRA-XX-00-DR-A-02500 P01, Bay Study West - Cycle Store Entrance; 6982-SRA-XX-00-DR-A-02502 P01, Bay Study West - Reception Bay 3; 6982-SRA-XX-00-DR-A-02503 P01, Bay Study West - Retail Shopfronts; 6982-SRA-XX-00-DR-A-02504 P01 Bay Study South - Retail Shopfront Bay 1; 6982-SRA-XX-00-DR-A-02505 P01 Bay Study South - Retail Shopfront Bay 2; 6982-SRA-XX-00-DR-A-02506 P01 Bay Study South - Retail Shopfront Bay 3; 6982-SRA-XX-XX-DR-A-02507 P01 Bay Study South - Curtain Wall Brise Soleil windows; 6982-SRA-XXXX-DR-A-02508 P01 Bay Study Curtain Wall Cladding with Stone Spandrel; 6982-SRA-XX-09-DR-A-02509 P01 Bay Study Pavilion Curtain Wall Typical Window Sections; 6982-SRA-XX-00-DR-A-02510 P01 Bay Study South - Retail Shopfront.

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

1. In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

2. 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.

3. The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon “chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the

owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms).

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. Waste Comments

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 .

Water Comments

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-nearourpipes&

data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab0

64154b7302a008dc53233be5%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638476657994527086%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Bf4DbQmYvIZnj4fTy%2B3cWvROnNkIihuMLiNDOZ

tNaDc%3D&reserved=0 If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

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 into account of this minimum pressure in the design of the proposed development.

5. GLAAS envisages that the archaeological fieldwork would comprise the following:

Excavation

An archaeological excavation should be carried out in the new lift pit area in order to remove all archaeological deposits in this area down to the lift pit formation level, in advance of construction.

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.

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Historic England

Ms Anastasia Tampouridou
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3520

Our ref: P01574400

21 March 2024

Dear Ms Tampouridou

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

1 OLD JEWRY LONDON EC2R 8DN
Application No. 24/00226/FULL

Thank you for your letter of 18 March 2024 regarding the above application for planning permission.

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

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

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

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

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

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

Yours sincerely

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.

Kate Tatlow
Business Officer
E-mail: [redacted]

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

From: BCTAdmin@thameswater.co.uk
To: PLN - Comments
Subject: 3rd Party Planning Application - 24/00226/FULL
Date: 02 April 2024 15:43:20

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 76768
Your Ref: 24/00226/FULL

2 April 2024

Dear Sir/Madam

Re: 1 , OLD JEWRY, LONDON, EC2R 8AJ

Waste Comments
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%2Fdata=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc532338e5%7C96a658cdb5cd4056851932228fa96be8%7C0%7C0%7C638476657994509091%7CUnknown%7CTWFpbGZsb3dKeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=81uEuG6vamxm%2B8n2AVnpEuG3yGw2AptpWUvmuqDz9fc%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc532338e5%7C96a658cdb5cd4056851932228fa96be8%7C0%7C0%7C638476657994519662%7CUnknown%7CTWFpbGZsb3dKeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=8gL2c7frvFCF3egjeLMSdogt0DEJQ603c7B41zjdXW8%3D&reserved=0

.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc532338e5%7C96a658cdb5cd4056851932228fa96be8%7C0%7C0%7C638476657994527886%7CUnknown%7CTWFpbGZsb3dKeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Bf4DbQnsYvIZnj4iTy%2B3cWvROnNkIhuMLiNDO2N6uDc%3D&reserved=0

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Supplementary Comments

Thames Water have been unable to determine the drainage strategy for this development, in particular the points of discharge for Foul & Surface Water. Design & Access statement, Section 9.2 (flood risk & drainage) refers to current flood risk and SuDS consideration, however, there is no stated discharge points for refurbishment and net dwelling increase.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:0203 577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk
Visit us online https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdata=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc532338e5%7C96a658cdb5cd4056851932228fa96be8%7C0%7C0%7C638476657994532788%7CUnknown%7CTWFpbGZsb3dKeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=8aWYMnipvR35IGw9%2FtdGDe9mmuO8hcHjqmDOKdvWXk%3D&reserved=0 , follow us on twitter https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc532338e5%7C96a658cdb5cd4056851932228fa96be8%7C0%7C0%7C638476657994538063%7CUnknown%7CTWFpbGZsb3dKeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Ubbyp871wTpUyUOQNiAE%2BBIZrZUIgxoZnuA6 1ewuir0w%3D&reserved=0 or find us on https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc532338e5%7C96a658cdb5cd4056851932228fa96be8%7C0%7C0%7C638476657994542566%7CUnknown%7CTWFpbGZsb3dKeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=fGX%2B9Pua9fL6fKcf0PEg3%2Bb44AeH0QUO2IEzBpBAxnyI8c%3D&reserved=0. We're happy to help you 24/7.

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From:	Location Enquiries
To:	PLN - Comments
Subject:	RE: Planning Application Consultation: 24/00226/FULL
Date:	04 April 2024 16:37:13
Attachments:	image001.png image002.png

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Application No: 24/00226/FULL
Site address: 1 Old Jewry London EC2R 8DN
Proposal: The change of use of part of the ground floor retail space to be used for office accommodation (Class E(c)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.

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 London Underground tunnels and infrastructure. This site is adjacent to Central Line. It will need to be demonstrated to the satisfaction of LUL engineers that:

- the proposed redevelopment will not have any detrimental effect on our tunnels and structures either in the short or long term;
- the design must be such that the loading imposed on our tunnels or structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not commence until the following documents, in consultation with London Underground Limited (LUL), have been submitted to and approved in writing by the local planning authority which:

a. accommodate the location of the existing London Underground structures and tunnels;
b. accommodate ground movement arising from the development construction. The Ground Movement Assessment (GMA) should consider the temporary and/or permanent changes in loading which may affect the London Underground structures and tunnels;
c. provide details on what impact the proposed load path and construction activities will have on LUL assets;
d. provide detailed design and Risk Assessment Method Statement for all demolition, temporary and permanent works;
e. mitigate the effects of noise and vibration arising from the adjoining railway operations;
f. no claims to be made against TfL or London Underground by the 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 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: 18 March 2024 14:49
To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Subject: Planning Application Consultation: 24/00226/FULL

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 1 Old Jewry London EC2R 8DN
.
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London
THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

This message has been scanned for malware by Forcepoint. www.forcepoint.com

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

10th April 2024

Dear Sir/Madam,

At its meeting on 4th April 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.56 24/00226/FULL - 1 Old Jewry, London EC2R 8DN
Bank Conservation Area/Walbrook Ward. Ward Club rep. Peter Cooper.
The change of use of part of the ground floor retail space to be used for office accommodation (Class E(c)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.

The Committee had no objection to the proposed ground floor alterations, but expressed concerns about the proposed timber cladding and requested further detail on the strategic views, specifically in relation to the pavilion and plant room. Further detailed information was required prior to commenting on the potential impact of the proposed new pavilion and plant room at roof level on the character and appearance of the Conservation Area.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

[redacted]

Mrs. Julie Foxa
Secretary

Historic England

Ms Anastasia Tampouridou
City of London
PO Box 270,
Guildhall, London EC2P 2EJ

Your Ref: **24/00226/FULL**
Our Ref:

Contact: Helen Hawkins

11th July 2024

Dear Ms Tampouridou,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021

1 Old Jewry London EC2R 8DN

The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.

Recommend Archaeology Condition

Thank you for your consultation received on 10th July 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact
All of the City of London 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 site was previously partially excavated prior to development works in 2007. Much of the archaeology was preserved in situ beneath the single basement, but some areas were excavated in the locations of new pile pits and service runs. Extensive archaeological remains of Roman and medieval date were recorded, including a Roman road, clay and timber buildings and masonry buildings.

An archaeological desk based assessment has been submitted with the planning application (MOLA 2024) which identifies that the only areas of proposed below ground impact from the new development comprise a new lift pit and some drainage. Given that archaeology is known to survive on the site, an archaeological condition is recommended in order to excavate and record remains in the areas of impact.

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 196 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

With reference to the loss of archaeological remains, the significance of the assets is such that if consent is granted the harm can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

Condition No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Excavation

An archaeological excavation should be carried out in the new lift pit area in order to remove all archaeological deposits in this area down to the lift pit formation level, in advance of construction.

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.

Watching Brief

An archaeological watching brief should be carried out for all new service runs excavated

below the existing basement slab.

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins
Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region

From:	London ePlanning
To:	PLN - Comments
Subject:	RE: 24/00226/FULL - 1 Old Jewry London EC2R 8DN
Date:	17 December 2024 10:41:48
Attachments:	2021 Planning and Listed Building Consent applications requiring consultation with and notification to Historic England.pdf

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email regarding the above application. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions, details of which are attached.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request. If we do not hear from you within five working days we will assume this application should not have been sent to us.

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

Thanks
Charlotte

Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

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-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 13 December 2024 15:03
To: London ePlanning <e-london@historicengland.org.uk>
Subject: 24/00226/FULL - 1 Old Jewry London EC2R 8DN

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works affecting the setting of a Listed Building.

The application and associated documents are available for viewing at http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S9OGZGFHIED00

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anastasia Tampouridou
Anastasia.Tampouridou@cityoflondon.gov.uk
020 7332

Details
OUR REF: 24/00226/FULL
ADDRESS: 1 Old Jewry London EC2R 8DN (Grid Reference: 532568, 181177)
PROPOSAL: The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From:	Location Enquiries
To:	PLN - Comments
Subject:	RE: Planning Application Consultation: 24/00226/FULL
Date:	03 January 2025 13:19:03
Attachments:	image001.png image002.png RE Planning Application Consultation 2400226FULL .msg

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Application No: 24/00226/FULL
Site address: 1 Old Jewry London EC2R 8DN
Proposal: The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no additional comments to make on this planning application (re-consultation) as submitted. However, our attached comments requesting for conditions are still valid and should be taken into consideration.

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: Friday, December 13, 2024 3:03 PM
To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Subject: Planning Application Consultation: 24/00226/FULL

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 1 Old Jewry London EC2R 8DN
.
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London
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Historic England

Anastasia Tampouridou
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00226/FULL
Our Ref: 231495

Contact: Helen Hawkins
[redacted]

Dear Anastasia,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2024

1 Old Jewry London EC2R 8DN
The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace. (Re-consultation due to amended documents.)

Recommend Archaeology Condition

Thank you for your consultation received on 18 March 2025.

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 site was previously partially excavated prior to development works in 2007. Much of the archaeology was preserved in situ beneath the single basement, but some areas were excavated in the locations of new pile pits and service runs. Extensive archaeological remains of Roman and medieval date were recorded, including a Roman road, clay and timber buildings and masonry buildings.

An archaeological desk based assessment was submitted with the previous planning application (24/00226/FULL MOLA 2024) which identifies that the only areas of proposed below ground impact from the new development comprise a new lift pit and some drainage. Given that archaeology is known to survive on the site, an archaeological condition was recommended for the previous application in order to excavate and record remains in the areas of impact.

A Written Scheme of Investigation for Archaeological Excavation and Monitoring and Recording (MOLA 2025) has been submitted with this application, which outlines how the archaeological mitigation will be managed on the site. The WSI is acceptable and a compliance condition is now recommended to allow the archaeological work to proceed.

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 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

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.

I therefore recommend attaching a condition as follows:

Condition No demolition or development shall take place except in accordance with the submitted Written Scheme of Investigation (*Written Scheme of Investigation for Archaeological Excavation and Monitoring and Recording*, MOLA 2025). For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI.

This 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 condition please let us know their reasons and any alternatives suggested. Without this condition being imposed the application should be refused as it would not comply with NPPF paragraph 218.

I envisage that the archaeological fieldwork would comprise the following:

Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

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
Telephone 020 7973 3700 Facsimile 020 7973 3001
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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.

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

19th April 2025

Dear Sir/Madam,

At its meeting on 10th April 2025 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.48 24/00226/FULL - 1 Old Jewry, London EC2R 8DN
Bank Conservation Area/Walbrook Ward. Ward Club Rep. John Tibbitts
The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace. (Re-consultation due to amended documents.)

The Committee objected to the revised application considering that the proposed balustrade was too far forward and needed to be pulled back from the front elevation in order to reduce the adverse impact on the character and appearance of the Conservation Area.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

[redacted]

Mrs. Julie Fox
Secretary

From:	Ankush Khanna
To:	PLN - Comments
Cc:	Tampouridou, Anastasia; Tampouridou, Anastasia
Subject:	Re: REF 24/00226/FULL
Date:	08 January 2025 10:45:58

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THIS IS AN EXTERNAL EMAIL

Good morning!

Of course.

My name is
Ankush Khanna
2 Salford Road
Balham
Sw24bh

Thanks,

Kush Khanna
Singer-Actor-Songwriter

[redacted]

On 8 Jan 2025, at 10:37, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Dear Ankush Khanna,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

[redacted] www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Ankush Khanna <[redacted]
Sent: 07 January 2025 18:30
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: REF 24/00226/FULL

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THIS IS AN EXTERNAL EMAIL

Dear team,
I am writing to formally object to the planning application **24/00226/FULL** concerning the proposed development , as outlined on the City of London Planning Portal.
While I appreciate the City's aim to promote growth and development, I am deeply concerned about the negative impact this proposal may have on the surrounding area.
Key concerns include:

1. **Impact on Historic Character:** The proposed development is not in keeping with the character of the Grade I listed building and other historic buildings nearby. These structures contribute significantly to the architectural heritage and cultural identity of the area. Allowing this development could set a precedent for further projects that might undermine this unique historic fabric.
2. **Visual Impact:** The introduction of modern construction in this sensitive location could disrupt the aesthetic and historic integrity of the area, detracting from the viewing experience of several iconic buildings.
3. **Potential Precedent:** Approving this application may encourage similar developments, leading to cumulative impacts that further erode the area's historic charm and architectural cohesion.

I urge the planning department to carefully consider the long-term implications of this proposal and prioritise the preservation of the area's unique historic and cultural value.
Should you require further clarification on my concerns, please do not hesitate to contact me.
Thank you for taking my objection into account.

Thanks,

Kush Khanna
Singer-Actor-Songwriter



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[redacted]

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THIS IS AN EXTERNAL EMAIL

Hi Shupi,

Apologies, my email signature didn't seem to go through. Now included.

[redacted]

> On 8 Jan 2025, at 10:38, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
>
> Dear [redacted]
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Shupi Begum
> Planning Administrator|Development Division
> City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
> [redacted]
>
>
> -----Original Message-----
> From: [redacted]
> Sent: 07 January 2025 17:13
> To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
> Subject: 24/00226/FULL
>
> [You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]
>
> THIS IS AN EXTERNAL EMAIL
>
>
> To Whom It May Concern,
>
> I am writing to object to the proposed development works at One Old Jewry, London, EC2R 8DN, as outlined in the recent public notice.
>
> As a London resident, City worker, and frequent visitor to the area, including as a member of The Ned private members' club, I am concerned about the potential impact of these works. The notice makes clear that the proposed alterations will affect the setting of listed buildings and the character and appearance of the conservation area. Given the historical and architectural significance of this part of the City of London, any changes must be approached with the utmost care and sensitivity.
>
> The scale and nature of the proposed alterations, particularly changes to elevations, appear to be substantial. Such works risk irreparably disrupting the skyline, diminishing the historical integrity of the area, and undermining the distinctive character that makes this part of London so unique.
>
> As someone who spends a great deal of time in the area, I can attest to its cultural and historical importance. It is vital that this heritage is preserved for current and future generations. I am also concerned about the practical impact of prolonged construction work, which would undoubtedly impose significant disruption on The Ned and its thousands of members, visitors, and staff.
>
> For these reasons, I wish to register my objection to the application and request that my concerns be taken into full consideration as part of the planning process.
>
> Thank you for your attention to this matter.
>
> Kind regards,
>
> [redacted]

Objection Letter to Planning Application 24/00226/FULL 1 Old Jewry, London EC2R 8DN

Ms Anastasia Tampouridou - Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270, Guildhall
London EC2P 2EJ

Anastasia.Tampouridou@cityoflondon.gov.uk

1. I am writing to object to the above planning application which seeks to change the use of part of the ground floor retail space to be used for office accommodation, refurbishment works at basement and ground floor levels and the construction of a new pavilion and plant room at roof level including the creation of an external roof terrace.

2. I am a frequent guest at the Ned hotel, using the rooftop facilities. One of the main attractions of the rooftop is the privacy it affords, particularly for users of the swimming pool. The proposed rooftop extension will overlook the Ned hotel's rooftop. I am also concerned about the noise that will be generated from the rooftop extension, as I understand that it will be used for various functions and events.

3. I do not think the design of the proposed development respects the setting of the Ned hotel, a Grade I listed building, which is of exceptional interest as only around 2.5% of listed buildings are Grade I. The hotel is also in a conservation area. In combination this means that even more importance should be given to ensuring that the proposed design of the rooftop extension is appropriate, being so close to a Grade I listed building in a conservation area. The bulk and scale of the proposed development will have a detrimental effect on the conservation area and the setting of the Ned hotel.

4. No consideration has been given to the construction of the development and how constrained the site is. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is used by many commercial operators and by construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period.

5. I am aware that the applicant refers to having met with the owners of the Ned hotel and that they have sought to work positively and proactively with them. I cannot therefore understand why this planning application is no different to the previous scheme and takes no account of the overlooking and inappropriate bulk and scale of the rooftop extension. This is a major planning application. The lack of any real engagement by the planning applicant with the public is concerning and I hope that Planning Committee can consider the matter so that the application is thoroughly debated and discussed.

Name: Dan Zaum
Address: Flat 28 Dorset House, 14 Mount Pleasant, London, WC1X 0BU

[redacted]

9/1/2025

From:	Akiko T
To:	PLN - Comments
Subject:	24/00226/FULL: Objection to Proposed Development at One Old Jewry, London EC2R 8DN
Date:	11 January 2025 16:09:38

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THIS IS AN EXTERNAL EMAIL

Subject: Objection to Proposed Development at One Old Jewry, London EC2R 8DN

Dear Sir/Madam,

I am writing to formally raise my objection to the planned development at 1 Old Jewry, London, EC2R 8DN, as detailed in the recent public notice.

I live and work in London and am in the City most days of the week with work, for my gym to maintain my physical health and socially — particularly as a member of The Ned private members' club —I have significant concerns about the potential effects of the proposed changes. The notice clearly indicates that these works will impact the setting of listed buildings and alter the character of the conservation area.

This part of the City of London holds immense historical and architectural value –which does not just impact us as locals but significantly impacts the appeal of London to the global tourist trade and industry for all international visitors who bring with them their investments and tourism income - and any modifications must be handled with exceptional care and sensitivity.

The proposed changes, particularly the alterations to the building elevations, seem considerable in scope. Such modifications risk damaging the unique skyline, eroding the historical significance of the area, and compromising the character that makes this part of London distinctive.

Having spent substantial time in this area, I can personally vouch for its cultural and historical importance. This particular area is a key representation of how the rest of the world views London and forms a significant identity of the United Kingdom, which is why it is featured in so many Hollywood movies. Preserving this heritage is essential not only for current residents and workers but for future generations as well. Additionally, the prospect of prolonged construction is concerning, as it would likely cause significant disruptions to The Ned and its many members, guests, and staff.

For these reasons, I strongly oppose the application and urge that my objections be carefully considered during the planning process.

Thank you for taking the time to review my concerns.

Yours sincerely,

Akiko Takashima
16 Barons Court Road, London W14 9DT

From:	Laurence Bain
To:	PLN - Comments
Subject:	Planning Application 24/00226/FUL
Date:	14 January 2025 16:54:33
Attachments:	1 Poultry Comment on 2400226FUL.pdf

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THIS IS AN EXTERNAL EMAIL

Dear City of London Planning,

24/00226/FUL

My name in Laurence Bain I was the lead architect/director of Number 1 Poultry in the office of James Stirling Michael Wilford and Associates Ltd I received a call a few days ago asking me to look at Application 24/00226/FUL and offer any comments that I may have. I was told the deadline for comments had been extended to later this month.

I note that on your website the Application has now gone to the Consideration stage. I have therefore somewaht hastily put together somewhat some comments that you may wish to consider when looking at this Application (see attached)

Appologies for any errors. I am happy to answer any questions.

Best Regards

Laurence Bain
5 The Green Richmond TW9 1PL

Laurence Bain – Comments on Application 24/00266/FUL

I have only recently been made aware of this Application. I was the lead architect on James Stirling Michael Wilford and Associates Ltd Number 1 Poultry. Please see No1 Poultry Official Listing Entry 1428881.

This Application is in many respects very detailed but appears to be missing - a careful and complete site analysis and a clear statement of the project brief as outlined below (see 1 to 4). In my opinion it is only when this information is provided that the Application can be fully assessed.

1. DRAWINGS IN CONTEXT

   City of London Planning Pre-Ap Report 24th April 2023 - Heritage Constraints and Potential Impacts -

   "*Existing and proposed Elevations and Sections within context are required to comment on the design merit on the proposal in the context of the conservation areas and local listed buildings"*.

   There are only very limited Elevations or Sections in this submission showing the building in the broader context. To fully understand the impact of massing and bulk of the proposals the following should be provided with OD levels of the proposals and its neighbours-

   - Elevations along Cheapside and Poultry (similar to those submitted in a previous application for the same site Application 05/00182/FUL)
   - Elevations along Old Jewry including sections of 1 Poultry showing the terraces /restaurant
   - More expansive Sections through The Ned - Midland Bank across Old Jewry and through neighbouring buildings.

   Based on the limited information provided the Applicant's drawings show a top of roof level of 54.456m above a Ground Floor FFL – 14.77m. The roof level appears to be considerably higher than all the neighbouring buildings and as such may be considered detrimental to the setting of listed buildings in the conservation area.

2. SITES NEUTRAL CONTRIBUTION

   The Applicant states in the Heritage and Townscape Assessment that the existing building makes a neutral contribution to the surroundings and does not hold any architectural or historic interest. It is this very neutrality and respect for its neighbours that makes No 1 Old Jewry of architectural interest. The fundamental question is therefore are the new proposals respectful to the surroundings and do they maintain the building's historical carefully designed neutrality?

   The Applicant describes the rooftop as a "pavilion" rooftop extension with additional plant above and that this has been designed to be sensitive to the surroundings.

   Does the "pavilion" respect the neutrality of the existing/proposed building?

   Is the pavilion, plant room and terrace respectful to the neighbouring buildings?

   These points appears not to have been satisfactorily addressed in this Application.

3. DESIGN & ACCESS – FUNCTION OF THE PAVILLION AND TERRACE

   There appears to be no explanation of the function of and access to the rooftop pavilion and terrace. The Applicant states that the terrace provide a flexible space for a variety of users.

   The drawings do not show a plausible layout

- who will have access – only tenants of the building?
- how will the pavilion be accessed?
- will everyone need to check-in at a reception?
- is there any limit on the capacity?
- will any food or drink be available if yes how will this be serviced?
- will there be a kitchen - bar etc?
- although not a planning matter it would be useful to know if a licence will be applied for?

4. OVERLOOKING

   The Applicant clearly hopes to exploit selected views from the proposed terrace but has failed to provide information on the views from neighbouring terraces towards 1 Old Jewry as requested in Pre-App 02 - 18/12/2023 "*The visual impact from neighbouring accessible terraces should be assessed especially from the adjacent listed buildings, One Poultry and The Ned*".

FARRER&Co

Ms Anastasia Tampouridou
Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ

Your Ref:24/00226/FULL
Our Ref: 107110.1
Tel:
Fax:
Email:

23 January 2025

By Email:

Dear Ms Tampouridou

Objection to planning application with reference 24/00226/FULL
1 Old Jewry, London EC2R 8DN

1. Introduction

1.1 We act on behalf of Vivas Invest & Finance Limited (**Our Client),** the owner of the Grade I listed former Midland Bank headquarters building which is used as the five star Ned hotel at 27 Poultry, London, EC2R 8AJ (**the Ned Hotel**). The Ned Hotel is immediately to the east of 1 Old Jewry, London EC2R 8DR (the **Property**). The Ned Hotel provides, amongst other things, hotel guest accommodation and a private members club (**Ned's Club**). Members of the Ned's Club have access to a range of private facilities including a rooftop pool and terraces.

1.2 We write in respect of the application for full planning permission with reference 24/00226/FULL (the **Application**) made in respect of the Property to the City of London (the **City**) on behalf of Deka Immobilien Investment GmbH (the **Applicant**) on 01 March 2024 for:

"*The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace*" (the **Proposed Development**).

1.3 The City granted the Application planning permission on 15 July 2024. However, the City's decision was quashed on 04 December 2024 following a claim for judicial review brought jointly by Our Client and the tenant of the Ned Hotel.

Farrer & Co LLP is a limited liability partnership registered in England and Wales, registered number OC323570, and is authorised and regulated by the Solicitors Regulation Authority (ID 447822). A list of the members of the LLP is displayed at the above address, together with a list of those non-members who are designated as partners.

1.4 The Applicant's agent submitted updated information in respect of the Application the next day, on 05 December 2024. The Application will be reconsulted on and redetermined by the City. The Proposed Development has not been altered by the Applicant and remains the same as the original submission.

1.5 We request that the Council refuse the Application for the reasons detailed in this letter, which include:

1.5.1 the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements;

1.5.2 the extent of the Proposed Development (including the increase in floorspace) is inconsistent across the Application documents and does not clearly identify the scope of the proposed works;

1.5.3 the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application;

1.5.4 the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

1.5.5 the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts;

1.5.6 the Proposed Development harms surrounding heritage assets;

1.5.7 the Application fails to correctly assess the daylight and sunlight impacts; and

1.5.8 lack of adequate community engagement on the Proposed Development.

2. The City's Development Plan

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. As at the date of this letter, the Council's development plan includes the following documents relevant to the Proposed Development:

2.1.1 City of London Local Plan adopted January 2015 (**Local Plan**);

2.1.2 City Plan 2040 Revised Proposed Submission Draft dated April 2024 (**Draft City Plan**);

2.1.3 The London Plan adopted March 2021 (**London Plan**);

2.1.4 the City's Developer Engagement Guidance dated May 2023 (**Developer Engagement Guidance**); and

2.1.5 the City's Statement of Community Involvement dated July 2024 (**SCI**).

3. Deficiencies in the Site Location Plan

3.1 The Town and Country Planning (Development Management Procedure) (England) Order 2015 (**DMPO 2015**) at article 7(1)(c)(i) requires planning applications to be accompanied by a plan identifying the relevant land subject to the Application. Government guidance states that the location plan "*should include all land necessary to carry out the proposed development (eg land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings).*"

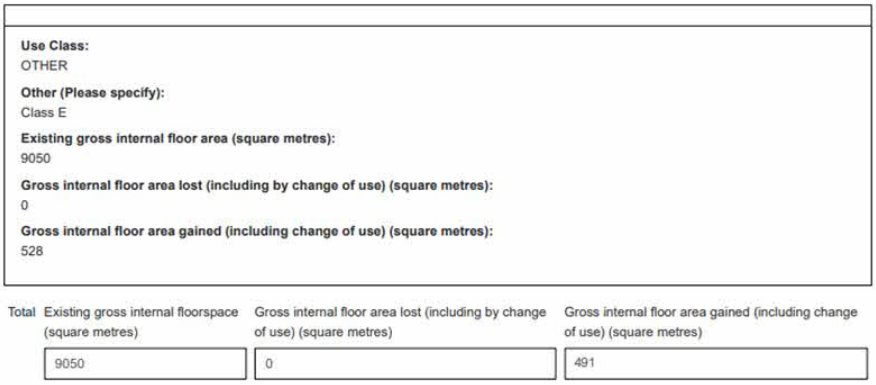
3.2 The site location plan drawing number 6982-SRA-XX-XX-DR-A-02100 Rev P01 dated 19 February 2024 (the **Site Location Plan**) does not meet the validation criteria as the red line does not include all land necessary to carry out the Proposed Development as the red line does not include:

3.2.1 land needed for construction vehicles and works to take place;

3.2.2 space for storage of construction materials, construction vehicles or welfare offices.

4. Unclear extent of the Proposed Development

4.1 The application form submitted with the Application dated 20 February 2024 (**Application Form**) is internally inconsistent as it provides two different figures for the gross internal floor area (**GIA**) gained (including change of use) as both 528 and 491 square metres (see extract below):



Use Class:
OTHER

Other (Please specify):
Class E

Existing gross internal floor area (square metres):
9050

Gross internal floor area lost (including by change of use) (square metres):
0

Gross internal floor area gained (including change of use) (square metres):
528

Total	Existing gross internal floorspace (square metres)	Gross internal floor area lost (including by change of use) (square metres)	Gross internal floor area gained (including change of use) (square metres)
	9050	0	491

4.2 The Community Infrastructure Levy (**CIL**) form 1 dated 20 February 2024 (**CIL Form**) states that the net additional gross internal area following the development is 491 square metres. It is unclear whether any change of use on the ground floor and basement floors or pavilion is included in the Application Form and CIL Form's calculations for the proposed gross internal areas. We note that both documents state that the gross internal area to be lost by change of use or demolition is 0.

4.3 We note that the planning statement dated February 2024 submitted with the Application (**Planning Statement**) states at paragraph 3.7 that the proposed **pavilion structure will provide an additional 385 sqm of GIA floorspace**. The Planning Statement also states at paragraph 3.26 that the "*Proposed Development will result in an increase in 530 sq. m of*

‘office’ floorspace across Ground and Basement levels. There will be a corresponding reduction in ‘commercial floorspace of 523 sq.m.”

4.4 Paragraph 3.17 of the Planning Statement states that the Property’s “*proposed primary office floorspace will measure 6,449 sq. m (NIA); a net increase of 616 sq. m (excluding those areas used for storage, stairwells, bathrooms and mechanical rooms)*.”

4.5 The Application Form, CIL Form and Planning Statement do not appear to correctly reflect the floorspace gained by the Proposed Development or detail the floorspace reductions via change of use. If the pavilion structure would result in an **increase of 385 sqm GIA and there is an increase in primary office floorspace of 616 sqm** NIA then the increase in floorspace as a result of the Proposed Development is **likely to be far more than 491 sqm or 528 sqm GIA** as is provided in the Application Form and the CIL Form. Indeed, the Proposed Development may actually result in the creation of more than 1,000 square metres of floorspace **which would mean that the Application falls under the article 2 DMPO 2015 definition of “major development”.**

4.6 The description of development is similarly unclear as to the extent of the works applied for – especially in relation to the works on the ground floor and basement. For example, it is unclear whether the Application includes a change of use for the ground floor commercial units which are otherwise restricted by condition 5 of planning permission 05/00182/FULL to retail (A1) use only.

4.7 Given the lack of detail as to the works included in the Proposed Development in addition to the discrepancies between the Application documents, it is difficult for anyone to appropriately assess the impact of the Proposed Development. We urge the Application to be refused.

5. Loss of retail floorspace

5.1 The Property is located within a Principal Shopping Centre (Cheapside). Local Plan policy DM 20.1 resists the loss of retail frontage and floorspace adding that additional retail provision is encouraged. Similarly, Draft City Plan policy RE1 states that loss of ground floor retail frontages and/or floorspace will be resisted.

5.2 Paragraphs 3.26 of the Planning Statement state that the Proposed Development would result in a reduction of commercial floorspace of 523 sqm – including a reduction of 150 sqm of retail floorspace on ground floor level. This reduction in retail frontage and floorspace is contrary to Local Plan policy DM 20.1 and Draft City Plan RE1 and the Application should be refused.

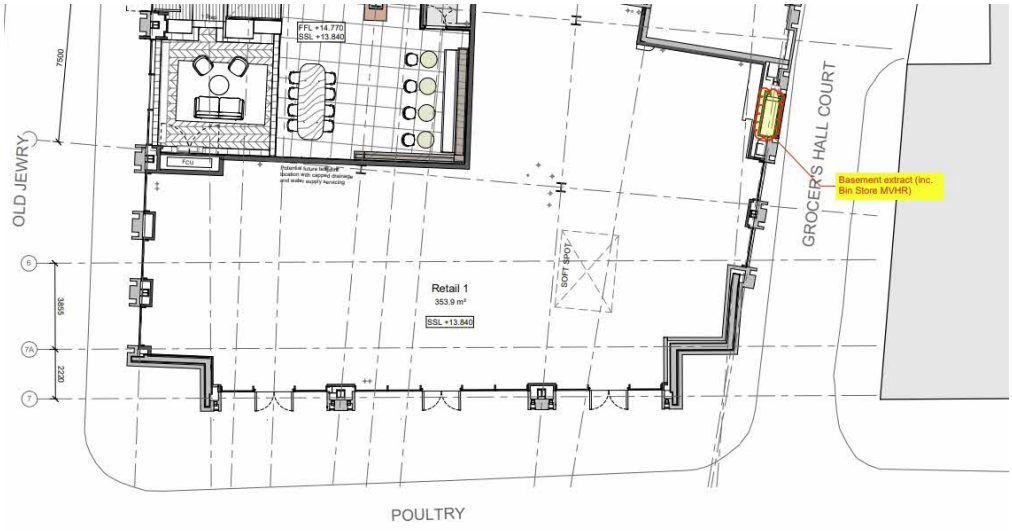
5.3 The Application does not appear to comply with the City’s pre-application advice of 28 April 2023 (**Pre-App Response 1**) which states that:

“*Local policies do not support the loss of ground floor retails [sic] floorspace within Principal Shopping Centres. However, as discussed in our pre-application meeting, there may be scope to retain the existing retail frontage and number of units but make changes to the depth of Retail Unit 1 to accommodate a larger office reception. This would need to be supported by robust justification which demonstrates that a smaller retail unit would be viable in this*

PSC location" and "***As a starting point the principle of development, involving the loss of retail floorspace and frontage in the PSC is not supported***" (emphasis added).

5.4 In a second pre-application response of 18 December 2023 (**Pre-App Response 2**) the City stated that "*a viability statement should be submitted as part of any application to support the proposal in line with the Draft City [Plan] policy RE1*" noting that the "*Draft City Plan highlights Old Jewry as a key retail link.*"

5.5 The proposed ground floor arrangement plan with drawing number 6982-SRA-XX-00-DR-A-20100 Rev. P06 shows only one retail unit on the ground floor "Retail 1" indicating the loss of two retail units (see extract below). It is also noted that the entrance doors to retail units open out onto public highway contrary to the City's Pre-App Response 1 as also shown in the extract below:



5.6 The Application does not provide a robust justification for the loss of two retail units at ground floor or evidence that one larger retail unit would be more viable than three smaller units. This is contrary to the Pre-App Response 1, Pre-App Response 2, Local Plan policy DM 20.1 and Draft City Plan policy RE1.

6. Inappropriate design

6.1 The Proposed Development should be refused because it is not of a high standard of design and harms the townscape and public realm contrary to Local Plan policy DM 10.1 on the basis that:

6.1.1 The bulk and massing are not appropriate in relation to the surroundings. The Proposed Development does not have due regard to the general scale, height, building lines, character and historic interest, urban grain and materials of the locality.

6.1.2 The Application does not demonstrate that there will not be unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding buildings and public realm.

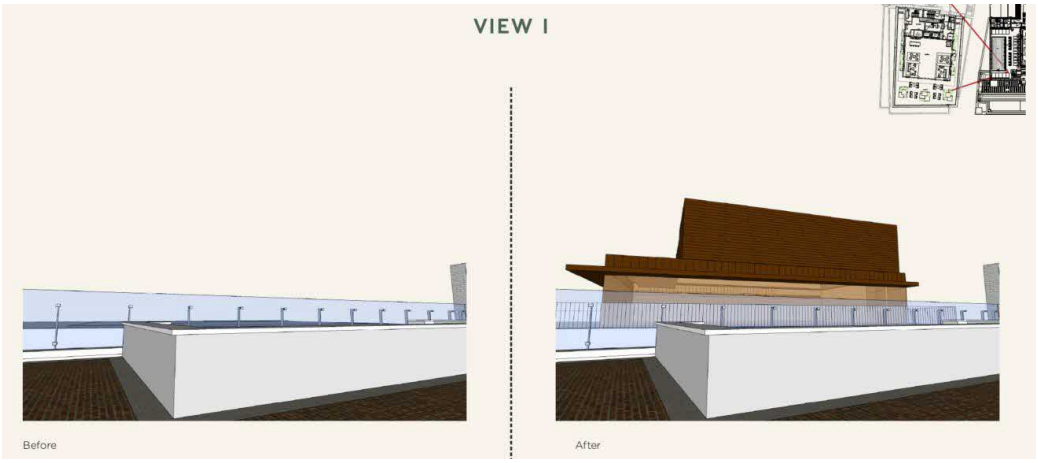
6.1.3 The design of the roof is not visually integrated into the overall design of the buildings when seen from street level or higher-level viewpoints. The plant enclosure and pavilion in particular are visually jarring and unintegrated.

6.1.4 Plant and building services equipment are not integrated into the design of the building. The plant room and pavilion adversely affect the character, appearance and amenities of the buildings and the area.

6.2 Paragraph 3.10.11 of the Local Plan states that "Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the buildings as viewed from surrounding buildings". The roofscape of the Proposed Development is incongruous with the surrounding rooflines, is overly dominant and out of character to the existing area. The view of the Proposed Development and the roofscape from surrounding buildings such as the Ned Hotel cannot be said to complement the surrounding buildings. The Proposed Development arguably harms the setting of the Grade I listed Ned Hotel, the Bank Conservation Area and the adjacent Guildhall Conservation Area.

7. Unacceptable impact on the Ned Hotel's business

7.1 The Proposed Development is unacceptably dominant and would result in a significant overlooking of the roof terrace of the Ned Hotel and a distinct reduction in the privacy currently enjoyed by the open space amenity area. Please see the visualisation of the impact of the Proposed Development on the Ned Hotel's rooftop amenity area (specifically the pool area) below:



7.2 The Ned Hotel's rooftop includes private amenity facilities, such as exclusive restaurants, bars and swimming pool for the sole use of member of the Ned's Club. The privacy and exclusiveness of the rooftop is a key reason that some members join the Ned's Club. The rooftop is currently not overlooked by any surrounding buildings.

7.3 The Proposed Development would significantly overlook the Ned Hotel's rooftop which may result in a reduction in the number of Ned's Club members due to negative impact on the rooftop's privacy. This would be of economic detriment to the Ned Hotel.

7.4 Given that the Ned Hotel's rooftop and the Property are only several metres apart, it is also possible that the Proposed Development's terrace and plant enclosure will have a significant negative impact on the Ned's Hotel in terms of noise. This is a particular concern for users of the Ned Hotel's hotel rooms, function rooms (which are used for weddings) and the rooftop area.

7.5 The Proposed Development has a disproportionately negative impact on the Ned Hotel and surrounding area and the Application should therefore be refused.

8. Harm to heritage assets

8.1 MVHC has been commissioned to review the impact of the Proposed Development on the surrounding heritage assets and objects to the Application. MVHC's review states that the Ned Hotel (being the former Midland Bank headquarters) is of exceptional architectural and historic interest, featuring outstanding architectural composition. The Ned Hotel is understandably listed as a Grade I listed building.

8.2 MVHC state that the Proposed Development's increased height, bulk, scale and materiality have a harmful effect on the neighbouring Grade I listed building (the Ned Hotel) and Grade II* listed 1 Poultry. Specifically, the height and massing of the proposed additions will appear unacceptably dominant and bulky, carrying little regard to the height of the designated heritage assets in the Property's immediate vicinity.

8.3 MVHC's objection also notes that whilst the proposed roof extension may be of limited visibility when viewed from street-level vantage points, the impact on the sensitivity of the Grade I listed Ned Hotel building , in particular its outlook towards St Pauls Cathedral and St Mary-le-Bow Church, will be substantial.

8.4 The Proposed Development significantly harms the setting and outlook of surrounding heritage assets and fails to have due regard to the requirements of The Planning (Listed Buildings and Conservation Areas) Act 1990 sections 66(1) and 72(1) and the requirements of policy DM12.1 of the London Plan. We agree with the conclusion of MVHC's review that the Application should be refused.

9. Unacceptable impact on daylight and sunlight

9.1 Policy DM10.7 of the Local Plan provides for how daylight and sunlight should be considered in determining applications. It states that (emphasis added):

> "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."

9.2 The Local Plan defines "open spaces" as "*Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.'*

9.3 Furthermore, Draft City Plan policy DE7 requires development proposals to demonstrate that the daylight and sunlight available to "*nearby dwellings and other sensitive receptors including schools, hospitals, **hotels** and hostels, places of worship and **open spaces**… is appropriate for its context and provides acceptable standards of daylight and sunlight*" (emphasis added).

9.4 The Pre-App Response of the City required the Applicant to carry out daylight and sunlight testing "*to ensure proposed new massing does not have detrimental impact on surrounding buildings*."

9.5 As of December 2024, the Application is now accompanied by a daylight and sunlight report prepared by Point 2 Surveyors Limited dated October 2024 (the **D&S Report**). However, contrary to the City's Pre-App Response which required the impact on the surrounding building**s** (plural) to be assessed, the Application only considers the impact of the Proposed Development on the Ned Hotel.

9.6 Paragraph 7.1 of the D&S Report incorrectly states that "*The Ned Hotel, does not contain residential accommodation and as a result does not have a reasonable expectation of daylight*". Draft City Plan Policy DE7 clearly identifies hotels as being sensitive receptors, which by extension, have a reasonable expectation of daylight and sunlight.

9.7 The D&S Report prepared by Point 2 Surveyors states that there are daylight reductions beyond the BRE recommendations to two bedrooms (three windows) within the Ned Hotel. Point 2 categorise each of these reductions as "minor adverse". GIA Surveyors have conducted an independent review of the daylight impact on behalf of the Ned Hotel and conclude that some of the reductions have not been accurately captured or categorised as per the nomenclature outlined in Appendix H of the BRE guidelines.

9.8 GIA concludes that, in addition to the two impacted bedrooms discussed in the Point 2 D&S Report, there will be a further "minor adverse" reduction of 27.8% to a sixth-floor bedroom window. Furthermore, two of the four impacted rooms will experience "No-Sky-Line" (NSL) reductions of 39% and 42%, both of which could be considered borderline "moderate to major adverse" reductions.

9.9 The D&S Report fails to accurately report the daylight and sunlight impact of the Proposed Development as demonstrated by the findings of GIA's independent review. The Proposed Development is contrary to Local Plan policy DM10.7 and Draft City Plan policy DE7.

10. Lack of adequate community engagement

10.1 The Application, as of December 2024, is now accompanied by a one-page engagement strategy prepared by Savills (**Engagement Strategy**) which sets out that prior to the submission of the Application, two pre-application meetings took place with the City's planning officers. The Application does not that demonstrate that the Applicant attempted to obtain any views from the local community or local stakeholders.

10.2 The Application does not include a statement of community involvement, despite this being requested by the City at pre-application stage and contrary to the Developer Engagement Guidance. The Applicant has not demonstrated that they have had any regard to the City's Developer Engagement Guidance or the City's Statement of Community Involvement. The lack of engagement and consultation was one of the grounds provided in the claim for judicial review in respect of the Application.

10.3 The Engagement Statement sets out the dates of three "dedicated meetings" between the Applicant / the Applicant's agent and our Client during which it is claimed that the Applicant sought to work positively and proactively with our Client. However, it was made clear to our Client that the Applicant would not make changes to the Proposed Development despite our Client's best efforts to work with the Applicant to find amendments to the scheme to mitigate the Proposed Development's numerous negative impacts on the Grade I listed Ned Hotel and surrounding Conservation Areas.

10.4 The consent order formally quashing the previous decision was granted by the Court on 4 December 2024. The covering letter re-submitting the Application for re-determination is dated the next day – the 5 December 2024 (the **Cover Letter**). The Cover Letter sets out that other than the addition of an overshadowing assessment and a daylight and sunlight report, there are "*no other changes to the [P]roposed [D]evelopment*".

10.5 We do not consider that the Applicant intended to make any amendments to the Proposed Development, despite attending meetings with our Client, as is evidenced by the lack of any amendments to the Application following re-submission.

11. Conclusion

11.1 For the reasons set out in this letter the Application should be refused.

11.2 The lack of any good faith engagement by the Applicant with the public and key stakeholders is concerning. We urge the City to determine the Application by planning committee so that the Application is thoroughly debated and discussed.

11.3 Kindly acknowledge receipt of this letter of objection in writing.

Yours sincerely

Farrer & Co LLP

PRESIDENT H.R.H. The Duke of Gloucester
PATRONS Sir Terry Farrell CBE Candia Lutyens S K Misra Margaret Richardson Professor Jane Ridley

THE LUTYENS TRUST

To protect and promote the spirit and substance of the work of Sir Edwin Lutyens OM

Anastasia Tampouridou
City of London Planning
Plan@cityoflondon.gov.uk

23 January 2025

Dear Anastasia,

1 Old Jewry, City of London EC2R 8DN: 24/00226/FUL - OBJECTION

The Lutyens Trust here submits the following objection to the above application, with apologies for its late arrival but with our thanks for your consideration of its content at this key stage.

The Lutyens Trust is a charity dedicated to preserving and celebrating the achievement of Sir Edwin Lutyens. The above site sits alongside the grade I former Midland Bank Headquarters, designed by Lutyens, recently skilfully and sensitively converted to The Ned Hotel. It was originally built between 1924-39 at a time of rapid acquisition, consolidation, and expansion by the Midland Bank. The project was of sufficient significance to the status of the bank to warrant employing Sir Edwin to collaborate with one of its usual commercial architects, Gotch and Saunders. Lutyens was entirely responsible for the external form, the banking hall, vault, the Directors 'palatial accommodation on the top floor, and important staircases. His role was to add refinement and timelessness to a modern steel frame.

The external elevations are of monumental and sophisticated design with subtle set-backs and diminishing courses that demonstrate Lutyens's concern for the smallest detail. The building is widely considered to represent one of the pinnacles of Lutyens's achievement, and is therefore a highly important building by one of England's greatest architects. In particular, the top floors are carefully articulated to create a roofline of some distinction.

The Lutyens Trust is concerned that the neighbouring proposal risks presenting an awkward profile alongside Lutyens's elegant roofscape. We ask that all significant viewpoints are investigated to ensure that the proposed new floors do not intrude alongside the elegantly composed Lutyens roofline.

Of no less concern is the impact on the amenities of The Ned. The hotel developers endeavoured to civilise the formerly utilitarian hidden roofs to the rear of Lutyens's domain. They created a swimming pool with private terrace that introduces a space of both spatial quality and amenity. The neighbouring proposal (just across the narrow Grocers 'Hall Court) will intrude on both the setting and privacy of this feature. The viability of the Lutyens building in its appropriate current use depends on the success of the hotel. The commercial and amenity value of its investment will be compromised by the proposed intrusion.

Goddards Abinger Common Dorking Surrey RH5 6JH
Tel: 01306 730487 www.lutyenstrust.org.uk
TRUSTEES: Charles Hind (Chairman) David Pittaway KC (Vice Chairman) Robbie Kerr Rebecca Lilley
Charles Lutyens Martin Lutyens Mark Lutyens Suzanne Marriott Stuart Martin Dr Mervyn Miller Paul Waite
DIRECTOR: Dr Deborah Mays HON TREASURER: Charles Lutyens
Registered Charity No 326776

The Montagu Evans Heritage Assessment majors on the valuable amenity that the new rooftop pavilion and terrace would bring to One Old Jewry but then fails to consider the intervisibility with The Ned's own amenity (described above) at this level. Montagu Evans advise there is no harm in the proposals to surrounding property only because they find - in para 4.32 - a 'lack of intervisibility from surrounding streets' yet fail to consider the same at roof level, despite recognising how considerable this amenity is for One Old Jewry.

Yours sincerely, with kind regards,

[redacted]

Dr Deborah Mays, Director
The Lutyens Trust

1 OLD JEWRY, LONDON EC2R 8DN

OBJECTION TO PLANNING APPLICATION
Reference No. 24/00226/FULL

JANUARY 2025

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1.0 INTRODUCTION

1.1 MVHC Ltd has been commissioned by the owner Vivas Invest & Finance Limited and tenant Poultry Tenant Limited (Our Clients) of the Grade I Listed former Midland Bank headquarters building converted into five star Ned Hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel), to prepare this report as an objection to the planning application (24/00226/FULL), submitted on 5 December 2024 to City of London, for the development at 1 Old Jewry, London EC2R 8DR (the SITE). The official description of the proposed development is as follows:

"*The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace* "

1.2 This document examines the submitted documentation accompanying the application for the planning permission and includes a brief summary of the significance of the identified heritage assets (in this case, relevant listed buildings and the Bank & Guildhall Conservation Areas) as well as the assessment of the potential impact of the proposed development on The Ned Building and other relevant heritage assets.

2.0 PLANNING CONTEXT

2.1 The City of London granted the Planning Permission for the initial Application on 15 July 2024 (Ref. 24/00226/FULL). However, the City's decision was quashed on 04 December 2024 following a claim for judicial review brought jointly by the Landlord and the Tenant of the Ned Hotel.

2.2 The Applicant's agent submitted updated information in respect of the Application the next day, on 05 December 2024. The Application will be reconsulted on and redetermined by the City of London. The Proposed Development has not been altered by the Applicant and remains the same as the original submission, albeit with some further reports submitted to respond to matters raised during the judicial review.

3.0 HERITAGE CONTEXT

3.1 THE NED BUILDING (FORMER MIDLAND BANK HEADQUARTERS) Grade I, Listing Number: 1064598

3.1.1 The original Midland Bank Headquarters building was designed and built between 1924 and 1935, by Sir Edwin Lutyens in collaboration with Gotch & Sanders. The building is of exceptional architectural and historic interest, featuring "outstanding architectural composition" and was listed Grade I in 1972. Historic England's listing describes it as one of Sir Edwin Lutyens "finest urban buildings" using materials, decoration and craftsmanship of the highest quality. The architecture, interior decoration and furnishings designed by Lutyens represent the most comprehensive commercial commission of the architect's career.

3.1.2 Built in simplified classical style, it is faced with Portland stone and arranged over five principal storeys with additional variously recessed single and double attics. The plan of the Midland Bank building is unusual, with two main axes that originate from Poultry and Prince's Street aspects and intersect at an irregular angle. The Prince's Street portion of the current building was, in fact, occupied by Midland predecessor the London Joint Stock Bank, since 1837. The larger, Poultry side was newly acquired and resulted in the demolition of many smaller buildings. The façade fronting The Poultry is rusticated and arcaded on the ground floor level, with order of vanishing pilasters and pair of Doric columns in antis to recessed entrance. Mezzanine is treated as pedestal to upper part with carved figures of boys at either end by Sir W Reid Dick.

3.1.3 The upper floors feature channelled stonework which finishes with simple tall arcade. Modelled central projection to attic with large, arched opening, Corinthian pilasters pediment and urns. Low, central dome and obelisks at either end. Short return to Grocers' Hall Court with later bridge. Beyond, plain elevation of white, glazed brick with stone to ground storey. Short elevation to Princes' Street is similar to front with three simple entrances.

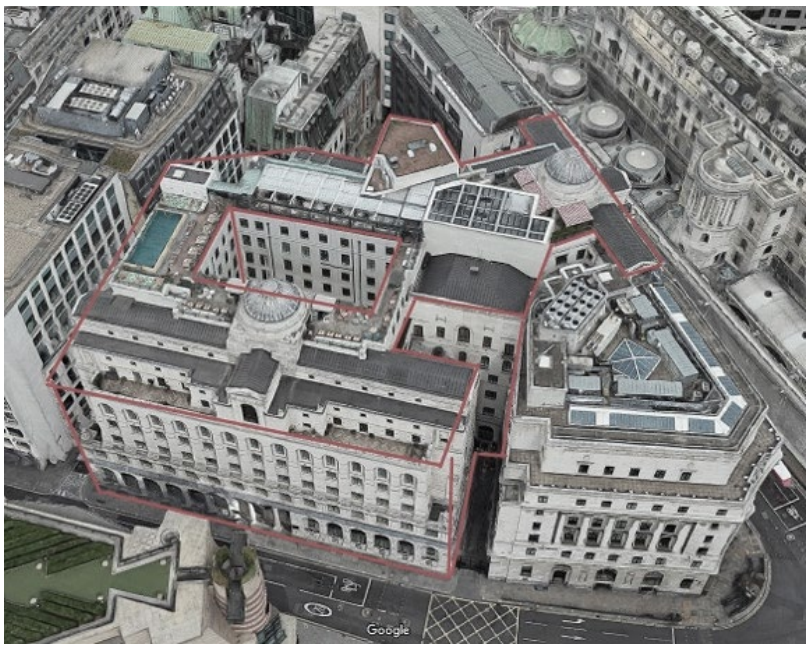
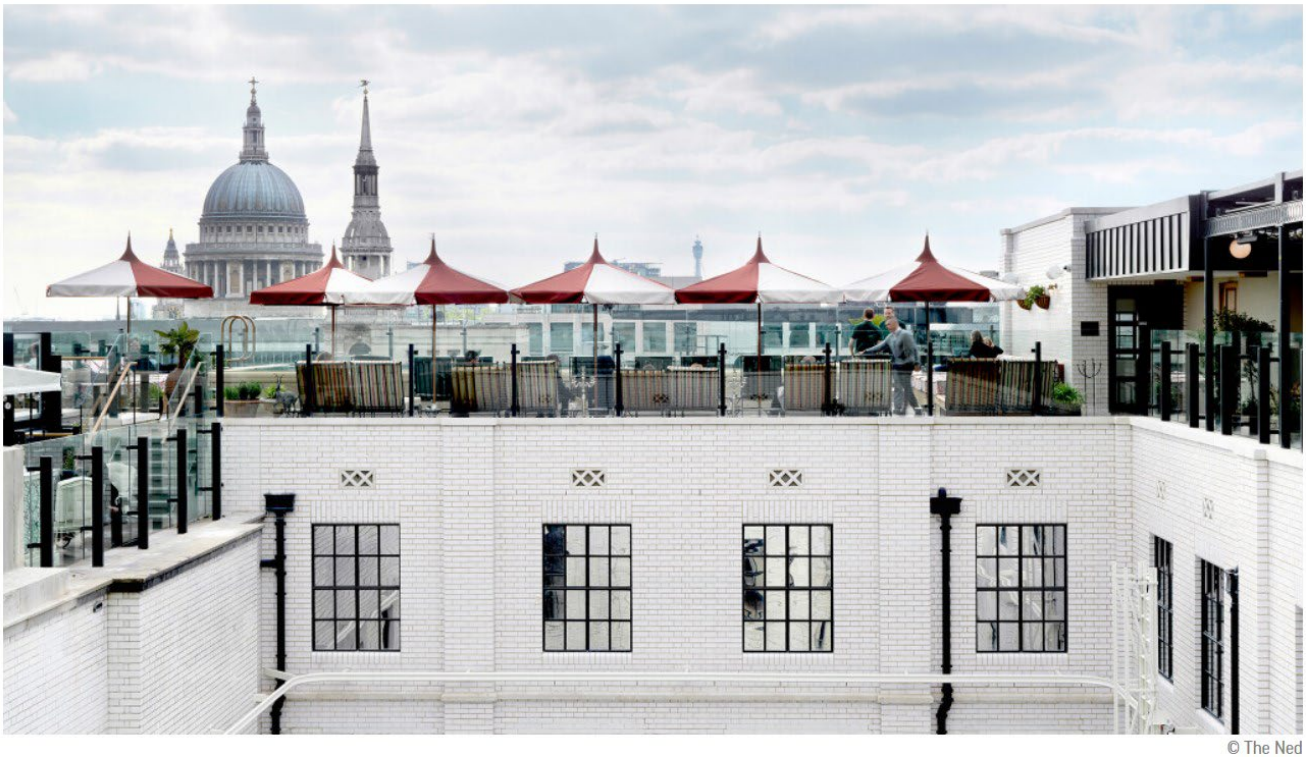


Figure 1 – Aerial View of the Ned Hotel building



Figure 2 – Poultry Street elevation

3.1.4 Following the Midland's financial decline in the late 20th century, it was absorbed into HSBC in 1992, and the Poultry headquarters was vacated and subsequently sold. The building was repurposed, and opened as a hotel, named "The Ned" in Lutyens' honour, in 2017.



© The Ned

Figure 1 – View from the roof top of the hotel towards St Paul's Cathedral and St Mary-le-Bow Church

3.2 Other listed buildings in the vicinity of the application site are:

- NO.1 POULTRY, Grade: II*, List Entry Number: 1428881
- NATIONAL WESTMINSTER BANK, Grade: II, List Entry Number: 1064599
- 35, OLD JEWRY EC2, Grade: II, List Entry Number: 1194166
- 8, FREDERICK'S PLACE EC2, Grade: II, List Entry Number: 1192711
- 7, FREDERICK'S PLACE EC2, Grade: II, List Entry Number: 1064668
- 6, FREDERICK'S PLACE EC2, Grade: II, List Entry Number: 1064667
- 3, FREDERICK'S PLACE EC2, Grade: II, List Entry Number: 1359184
- 4, FREDERICK'S PLACE EC2, Grade: II, List Entry Number: 1192710
- TOWER OF FORMER CHURCH OF ST OLAVE, Grade: I, List Entry Number: 1359180
- BANK OF ENGLAND, Grade: I, List Entry Number: 1079134

3.3 CONSERVATION AREA(s)

3.3.1 The site and its immediate environs are situated within the Bank Conservation Area within City of London, designated originally in 1971. Conservation areas are designated if they are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Historic England has published guidance in respect of conservation areas, and this provides a framework for the appraisal and assessment of the special interest and significance of a conservation area.

3.3.2 The specific characteristics which contribute to the special interest of Bank Conservation Area are summarised in the Character Summary and Management Strategy SPD published by the City of London in 2012.

- *an area where buildings and streets are harmonised by their predominant use of solid masonry facades with regular punched openings, enriched by abundant classical modelling and surface detail.*
- *a number of nationally significance and well-known buildings, the headquarters of major corporations, and internationally significant churches.*
- *an area defined by the design and use of buildings for banking and associated commercial activities.*
- *an area of large-scale commercial buildings set on principal thoroughfares within a network of historic streets, courtyards and alleyways, which creates a distinctive and dense urban environment.*
- *the largest concentration in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous unlisted buildings of high architectural quality from different periods.*
- *a visual character and groundscape that is enriched by a wealth of materials, features, monuments, public sculpture, signs, plaques, statuary, and other structures.*

3.3.3 The City of London's Character Summary and Management Strategy SPD divides the area into five sub-areas for more detailed analysis. The Ned is located with the Bank Junction sub-area, where the following characteristics are noted:

- *Each building makes a distinctive contribution to the area's character and appearance, and there are a number of common architectural characteristics that unite individual buildings and the space as a whole.*
- *A giant order of Corinthian or Composite columns and pilasters is the most distinctive architectural classical detail to unify prominent buildings on the junction and enhance the monumental character of the entire space.*
- *Buildings around the junction rise to a height of six storeys, with the majority having additional set-back attic storeys or mansard roofs.*
- *Carved sculpture provides interest and variety to buildings at different heights.*
- *The building materials used for the exterior of buildings, hard surfaces and street furniture assist in unifying the space and defining the character of the area*

3.3.4 The Guildhall Conservation Area was initially designated in 1981, with subsequent revisions to its boundaries occurring in 1991 and 2007. Situated to the west of the Site, the southeastern boundary of the conservation area follows the centreline of Old Jewry. This boundary is adjacent to the western edge of the Bank Conservation Area. Central to the character and appearance of the conservation area are the Guildhall buildings, the surrounding urban blocks, and the spaces situated between Gresham Street and Cheapside.

4.0 PROPOSALS / OBJECTION DISCUSSION

4.1 Current proposals involve general reconditioning and refurbishment and upgrade of the existing building and a construction of two additional storeys - the pavilion with roof terrace and the plantroom area above.

4.2 This objection is predicated upon the following issues:

- The design does not satisfy the requirements of NPPF.
- Detrimental Impact on the setting of the Grade I Listed Building.
- The proposal fails to preserve or enhance the character of the relevant heritage assets and their settings and therefore contravenes the tenets of NPPF and by implication, local plan policies.
- The proposal will have detrimental impact on the enjoyment, use and interpretation of the significance of the Grade I Listed building
- The proposed two-storey roof extension resulting in increased height and its bulk, scale and materiality have harmful impact on the neighbouring Grade I Listed building.
- The loss of outlook, and loss of privacy

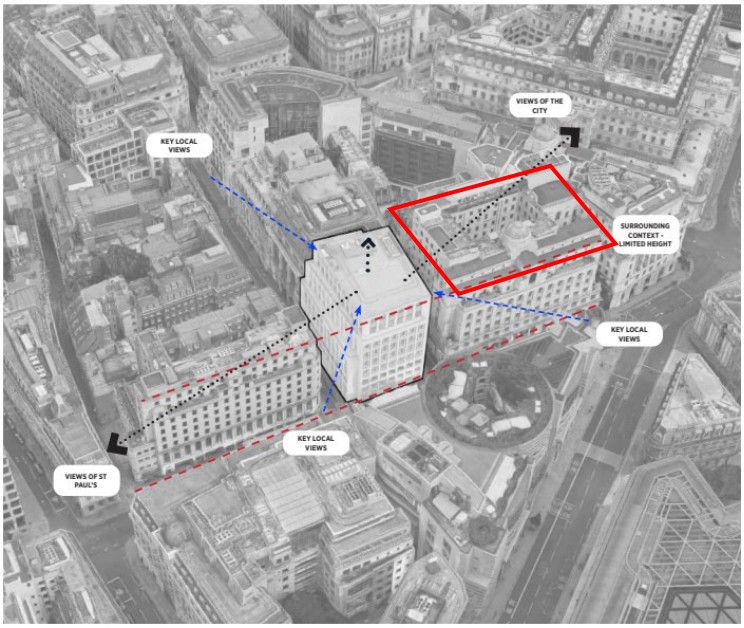
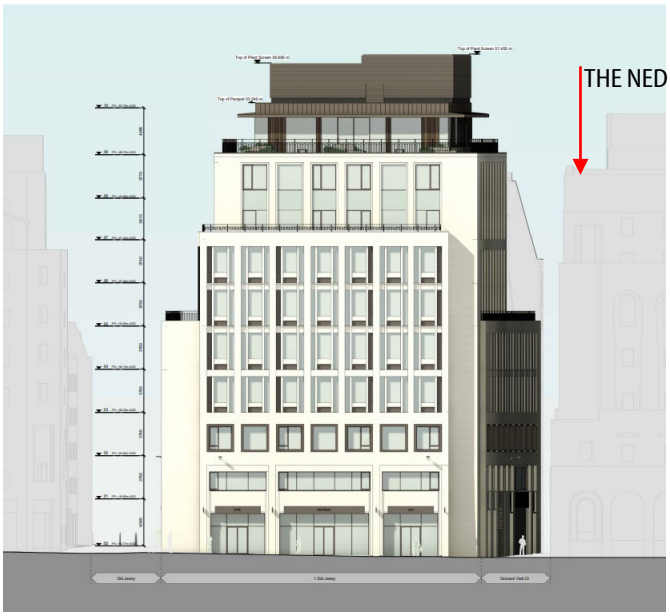


Figure 2 – Identified views from the application site – the Ned Hotel is marked with red line

PROPOSED ROOF EXTENSION



PROPOSED POULTRY ELEVATION



PROPOSED GROCER'S HALL COURT ELEVATION

4.3 The HERITAGE AND TOWNSCAPE ASSESSMENT (February 2024) prepared by Montagu Evans in support of the application analyses the application site, its significance and contribution to its historical context and assesses the impact of the proposals. Below are relevant excerpts from their statement and our response.

4.3.1 *Para 4.14 states: "The Site forms part of the setting of the historic building focussed on the junction and forms part of the commercial character extending west away from the Bank Station Junction. As noted, the conservation area includes a material palette of predominantly Portland Stone, and includes a high concentration of detached, larger format buildings. Owing to its scale and simple proportions, consistent and regular fenestration pattern, coupled with its scale and form being consistent with the scale of surrounding buildings it is considered that the Site makes a neutral contribution to the character and appearance of the conservation area. Equally, its Portland Stone façade remains consistent with the overarching material palette, sitting comfortable with the character and form of the surrounding area.*

4.3.2 Para 4.17 states: "*The proposed rooftop additions have been designed and scaled to respond to the surrounding sensitivities, including local views identified within the Bank Conservation Area Character and Management Strategy SPD. Setting back of the proposed pavilion to the northern half of the existing roof ensures that it is not visible in such views, particularly in views west/ north-west along Lombard Street (identified as Viewpoints 38 and 72 in the adopted SPD and as Townscape Views 02 and 03 within the supporting Design and Access Statement – see Figures 4.3 and 4.4)." and*

4.3.3 *Para 4.18 states: "Whilst the supporting VuCity imagery at Figures 4.3 and 4.4 demonstrate a lack of intervisibility from sensitive locations within the conservation area, if visibility were to become discernible, the proposed pavilion structure will be seen within a varied townscape of differing roof forms, with visibility reserved to glimpsed, incidental views within one's peripheral vision. Furthermore, only small elements of the pavilion structure would be visible, and it is not considered that such visibility has the potential to alter or indeed impact the on one's ability to appreciate the commanding streetscape comprising the Capital's most important civic/ commercial buildings surrounding Bank Junction. The modest approach to the rooftop pavilion ensures that the existing building at No. 1 Old Jewry continues to appear proportionate to the height of the adjacent buildings, including the Grade I listed Millbank building, as well as No. 1 Poultry. Visibility of balustrading to the crown of the building in views along Poultry and from within Bank Junction have been mitigated through detailed design, so to limit visibility and introduce lightweight structural form, ensuring that such structures are not prominent features within such views.*

4.3.4 *Para 4.19 states: "Overall, the proposals offer a simple solution to enhance the Site's contribution to the Bank Junction area, improving the appearance of the building through façade enhancements, whilst also introducing active frontages at ground floor level, which stands to benefit the streetscene […]"*

RESPONSE:

4.4 The application building is indeed a neutral contributor to its heritage context, thanks to its (as per Montague Evans Statement) "[…] *scale, simple proportions* […]" and "*its scale and form being consistent with the scale of surrounding buildings* […]" Additionally, the statement notes that "*Portland Stone façade remains consistent with the overarching material palette, sitting comfortably with the character and form of the surrounding area.*" The proposed roof additions will alter the current "neutral" contribution to the conservation areas, and the setting of the neighbouring listed buildings. These changes are considered below:

HEIGHT/SCALE/MASS/FORM

4.5 The existing building respects the existing heritage context. It does not compete with designated heritage assets in its vicinity, it is subservient (as it should be) to its Grade I and Grade II* listed neighbouring buildings successfully blending within its immediate and wider context. The new two-storey roof extension will compromise its current relationship with the surrounding buildings. The height and massing of the proposed additions will appear dominant and bulky, carrying little regard for the height of the designated heritage assets in its immediate vicinity. The appearance of the successful amalgamation within its heritage context will be lost. The two-storey roof extension is certainly not a "*modest*" addition. It is unclear in what way it "*ensures the appearance of proportionality*" to the height of the adjacent or neighbouring buildings – including Grade I Listed Ned Hotel and Grade II * No 1 Poultry. We would argue that, on the contrary, the proposed extension appears overwhelmingly dominant and uncompromisingly oblivious of the neighbouring building's sensitivity. Also, *"detailed design*" of the balustrading) does not limit the visibility or the visual impact the proposed extensions have on the outlook from the Ned Hotel rooftop.

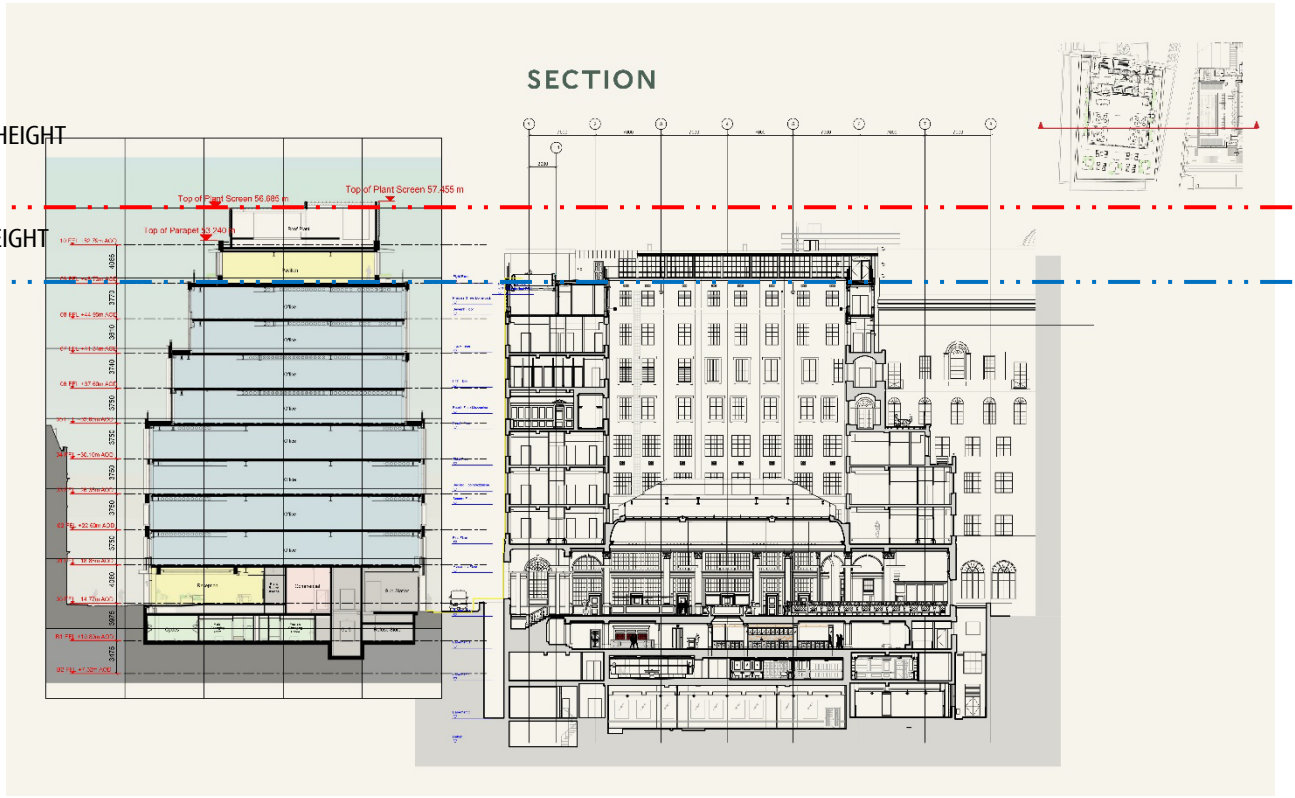


Figure 3 – Section showing the height of the new roof additions and the relationship with Ned Building.

MATERIALITY

4.6 The consistency of the use of Portland stone and complementing materials is recognised as a positive and appropriate attribute of the existing building. In contrast, the proposed materials for the new roof extension, the timber finish (for the façades and soffits), and high-quality bronze metal louvres (for the plant enclosure) will appear entirely alien to the existing palette of materials found in the immediate and wider context. The dark colour and texture of the proposed pavilion/plant enclosure do not create continuity with the neighbouring historic building or with its own Portland Stone façade. Visually the chosen materials further exacerbate the appearance of the scheme.

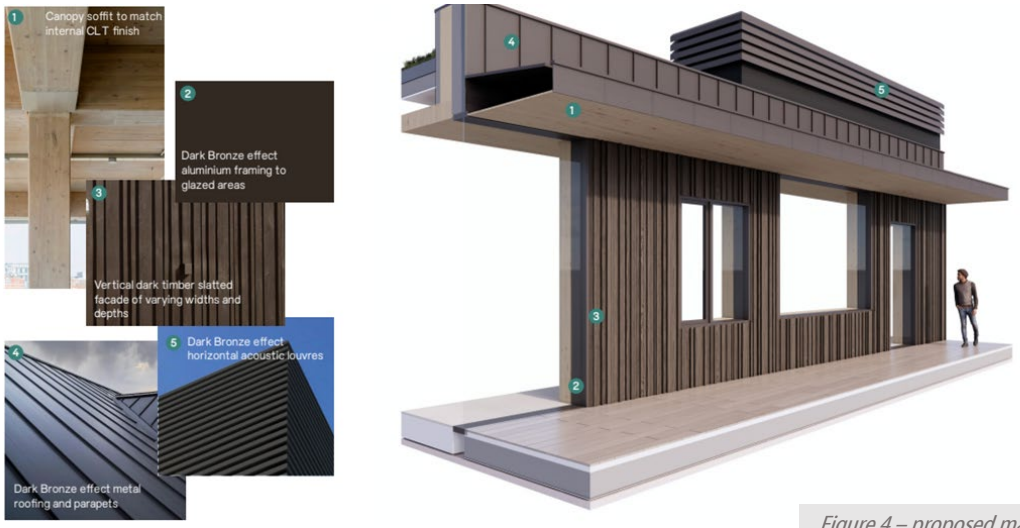


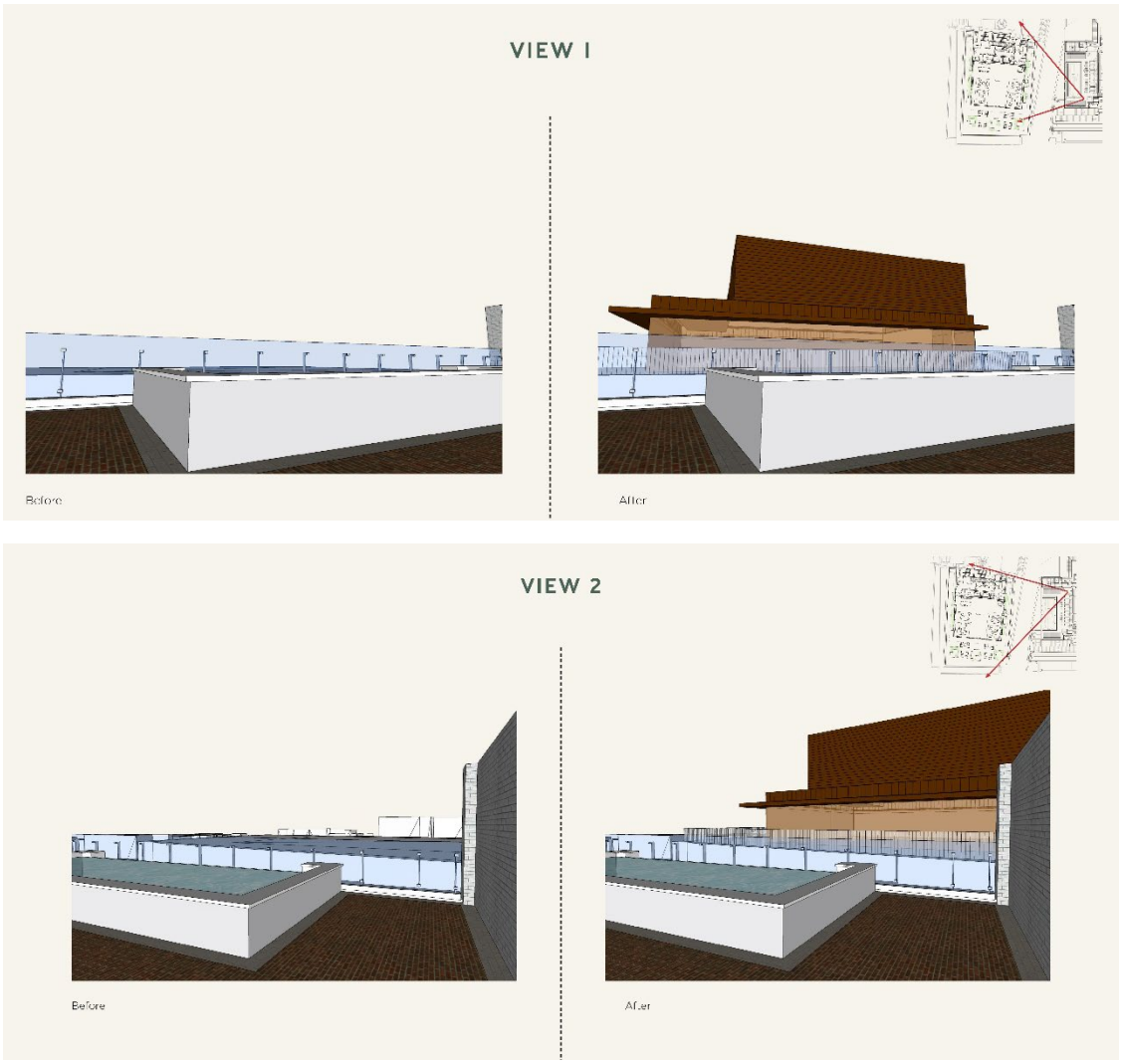
Figure 4 – proposed materials

VISIBILITY/OUTLOOK

4.7 Whilst the proposed roof extension may be of limited visibility when viewed from street-level vantage points, the impact on the sensitivity of the Grade I listed Ned building, in particular its outlook towards St Paul's Cathedral and St Mary-le-Bow Church, will be substantial (Please see Figs 5,6 and 7).



Figure 5 - Current outlook from the roof top of the Ned Hotel.



Figures 6 & 7 – 3D renders of the views taken from the roof terrace of The Ned, showing the outlooks before and after the proposed development

4.8 The Montague Evans Heritage and Townscape Assessment states in Para. 4.31: *"Whilst the proposed extension and external plant area will introduce new built form within the context of the listed building, including in views from the external terrace of the building's new use as a hotel/ private members club, this is not considered to constitute a negative effect on its significance as a former, early-mid-20th century banking headquarters, which never historically had external terraces or outdoor rooftop amenity space, which make no contribution to an understanding of the asset, or its significance. "*

And

4.9 Para 4.32 states: *"The immediate and wider setting of the listed building includes a vast range of development, including rooftop additions, amenity terraces, plant and lightweight pavilion structures. It also includes a high proportion of tall building development associated with the intensification of the commercial development within the City of London. Owing to the lack of intervisibility of the proposed roof extension from the surrounding streets, where the Classical/ Italian Mannerist style of Midland Bank can be best experienced, coupled with the building's relationship with financial institutions at Bank Junction, we do not consider that the proposals stand to cause harm to the building's significance, which will ultimately be preserved."*

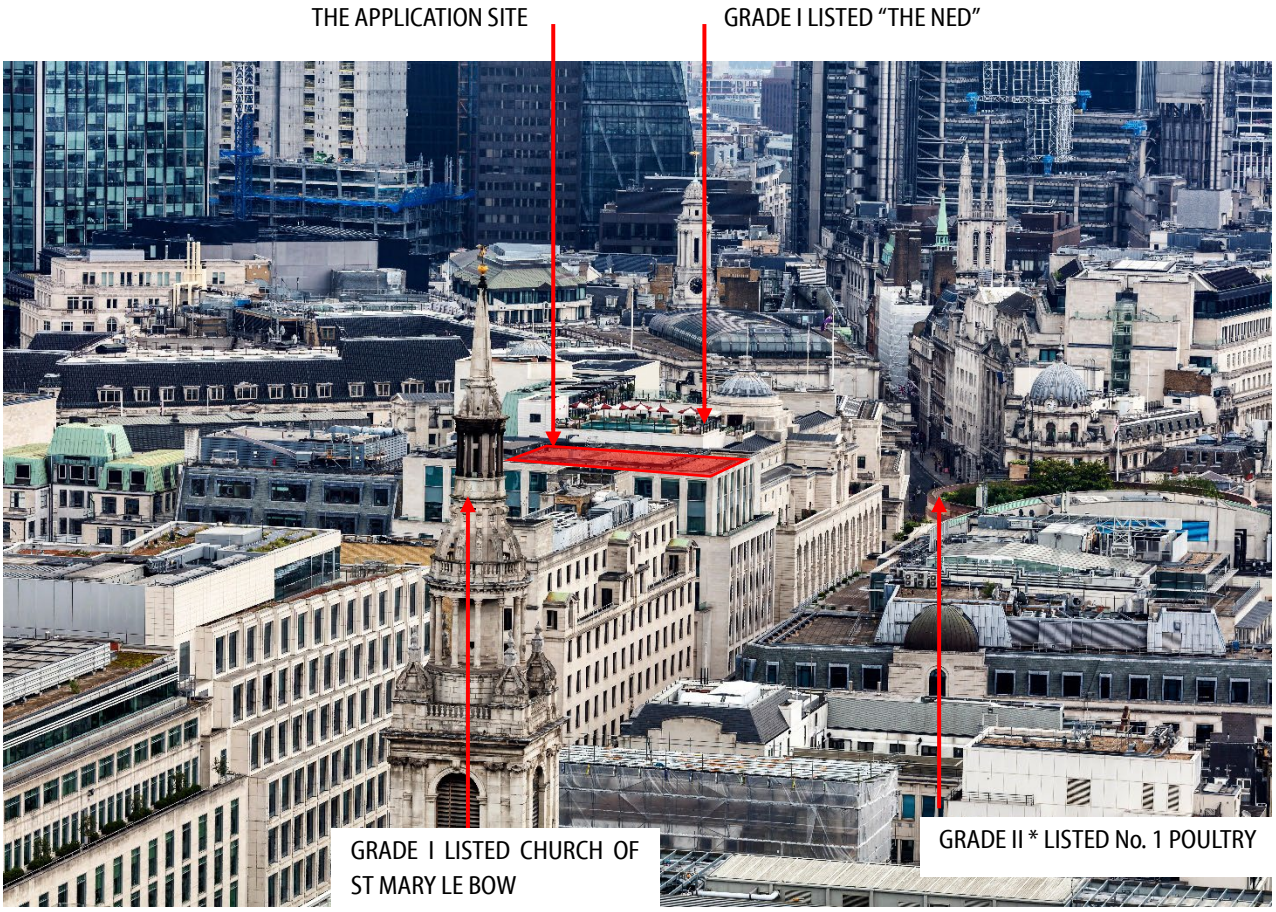


Figure 8 – The roofscape showing the relationship between the application site, the Ned Hotel and The Poultry and general outlook from the Church of St Mary Le Bow.

4.10 In response to Montague Evans Para.4.31:

4.10.1 The significance of the Ned's Hotel building lies not only in the elevations or interiors but in the cohesiveness of all the elements of the building, thus including its rooftop. Since the building ceased to be used as a bank, it remained unoccupied for a considerable amount of time. The Historic England "Conservation Principles" and the NPPF define conservation as "managing change." NPPF recognizes that change and adaptation must occur if historic buildings are to survive at all. This can be achieved only with a considerable investment in the repair, maintenance, and enhancement of properties, as was the case with the rejuvenation of the former Midland Bank.

4.10.2 Often, finding new uses for the designated heritage assets is the most difficult aspect of the preservation of historic buildings. The sensitive restoration and enhancement involving a considerable investment in transforming this exceptional heritage asset into an outstanding five-star hotel ensures its preservation for posterity. No part/element of the substantial regeneration scheme, including the role of the roof terrace, can be disregarded.

4.10.3 Montague Evans states that the new roof extension "*is not considered to constitute a negative effect on its significance "(*on the Ned building) because this was a "*banking headquarters, which never historically had external terraces or outdoor rooftop amenity space*" and it "*make no contribution to an understanding of the asset, or its significance. "*

4.10.4 The NPPF 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 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*".

4.10.5 We believe that Montague Evans assessment fails to recognise how relevant the roof terrace is to the Ned Building. The argument of whether some part of the building was not there historically, does not automatically translate into lack of significance. Buildings evolve over time and if the new additions enhance their overall special interest, they must be given appropriate consideration and their contribution should be recognised, not dismissed. The roof terrace of Ned Building enhances the significance of this historic building and is therefore relevant when considering the impact of the proposed scheme. Its significance cannot be disputed and appropriate justification for the loss of this significance must be provided.

4.11 In response to Montague Evans Report, Para. 4.32:

4.11.1 While it is acknowledged that a variety of rooftop treatments exist within the context of nearby listed buildings potentially impacted by the proposed development, there are no roof additions in their immediate vicinity that are as visually prominent as the one proposed. In fact, most surrounding buildings feature rooftops that are of similar heights or lower, thereby respecting the setting of these heritage assets.

4.11.2 The construction of the newly built form is contested due to its scale, form, location, design, and materiality, as well as the failure to adequately consider the sensitivity of Grade I Listed Ned Hotel building. The introduction of the newly built form within close proximity to the Grade I listed building demands adequate scrutiny proportionate to the value of the heritage assets that may be affected. The submitted assessments appear to lack a thorough understanding of the significance of Ned's Hotel and seem to underestimate the potential harm that the new development could cause. We believe that the impact on the significance of this heritage asset cannot be solely considered through assessment of the street views, but that the visual experience from the building needs to be considered if it represents part of its significance as it is the case of the roof terrace and its use.

5.0 PLANNING POLICY

5.1 THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

5.1.1 The legislation context managing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act of 1990.

- Section 66(1) of the Act requires decision makers 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*" when determining applications which affect a listed building or its setting.
- Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay "*special attention […] to the desirability of preserving or enhancing the character or appearance of that area."*

5.12 The proposed roof extension harms significance and the setting of the neighbouring Grade I listed Ned building, at 27 Poultry or Grade II* listed 1 Poultry, by its scale, height, form and materiality. The proposed roof extension relates poorly to the architecture of the host building within its own context as well as with the neighbouring designated heritage assets. The use of dark timber cladding and dark brass for the plant enclosure accentuates the ungainliness of the additional volume of the proposed extension. It appears alien, not in keeping with the existing historical context and material palette. The proposed roof extension does not enhance the character of the Bank or Guildhall Conservation Areas.

5.2 NPPF

5.2.1 The National Planning Policy Framework (NPPF) was first published on 27 March 2012 and its most recent revision was in December 2024. It is the principal document that outlines Government's planning policies for England and how / when these should be applied by the Local Planning Authorities (LPAs).

5.2.2 Paragraph 202 states: "*Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations"*

5.2.3 Paragraph 203 states that new proposals should take into account following:

- "*The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*

- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.*

5.2.4 The proposed roof extension fails to sustain/enhance the existing relationship with its the historic context. The additional storeys make no contribution to the local character and distinctiveness of the conservation area(s). Also, the form, bulk and massing of the proposed extension creates somewhat aggressive and unfriendly appearance, in particular evident on the elevation facing Old Jewry and Grocer's Hall Court. The large and oppressive appearance of the proposed roof additions substantially harm the outlook from the roof terrace of the Ned building, showing no regard to its setting.

5.2.5 Paragraph 212 states: *"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."*

5.2.6 The Ned is a Grade I listed building, designed by Sir Edwin Lutyens, who is widely recognized as England's greatest architect since Sir Christopher Wren. Originally conceived in 1924 and completed in 1939 as the headquarters for Midland Bank, it is now celebrated as an architectural gem and an exemplary representation of early 20th-century architecture in London. The transformation of this former bank into a five-star hotel embraced a conservation-led approach, emphasizing the refurbishment and enhancement of its heritage values. This project was honoured with the RIBA London Award in 2019. The successful conversion of the bank into a modern hospitality destination has ensured the preservation of this significant piece of architectural history.

5.2.7 The documentation supporting this proposal fails to recognise the overall significance of the Grade I Ned building by dismissing importance of its roof terrace. We urge the planning authorities to undertake appropriate scrutiny of the submitted assessments giving the affected heritage assets and the preservation of its significance appropriate weight. Equally, the level of the negative/harmful impact upon the setting and significance of the Ned building must be recognised.

5.2.8 Para. 215 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"*

5.2.9 Public benefits of the proposed scheme has been identified by the applicants as follows:

- *"Support the economic function of the Central Activities Zone where expansion of missed use commercial development is supported.*
- *Create additional office floorspace through intensification of an existing premises to help meet the growth targets identified within the adopted and emerging City of London Local Plan.*
- *Achieve sustainable, economic development on previously developed, 'brownfield' land consistent with the aims and objectives of the London Plan and City of London Development Framework.*

- *Deliver substantial economic benefits, including significant private investment and the creation of up to circa 662 jobs during operation, plus additional jobs created during the construction period.*
- *Deliver improvements to the streetscene of Poultry and Old Jewry, enhancing active frontages and passive surveillance improving safety and vitality; and*
- *Achieve high levels of sustainability, including a target BREEAM rating of 'Outstanding', and deliver biodiversity improvements linked to the installation of new roof terraces and external landscaping;"*

5.2.10 The regeneration of the office and commercial building, including the expansion of office space and the addition of a new roof terrace, primarily presents economic advantages for the property in question. However, the description of these advantages as explicit "*public benefits*" remains uncertain and is open to interpretation. We ask the Local Authority to reconsider whether the "public benefits" quoted above, truly justify or outweigh the evident harm to the designated heritage asset caused by the proposals.

5.2.11 In comparison to these speculative benefits attributed to the proposed development, the demonstrable public benefits associated with finding and ensuring the optimal and sustainable use of the Ned Building thereby safeguarding its continued existence and preservation, should be acknowledged and appreciated.

5.2.12 It is essential to recognise the extent of the potential harm emanating from the proposal and to endeavour to protect this heritage asset.

5.3 LONDON PLAN

5.3.1 Policy DM12.1 (Managing change affecting all heritage assets and spaces) states that development must seek to sustain and enhance heritage asset, their settings and significance, with development required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces, as well as their settings.

5.3.2 The description of the design rationale (Design and Access Statement, Shepperd Robson Architects, Para. 2.7 pg.13) behind the proposed transformation of the existing building (including the addition of the new storeys) states: *"[…] Constraints for additional height impacting key views due to strong existing context parapet datum and sensitive key surrounding views. Excellent views are available of the City and St Pauls from the upper floors and the provision of a communal roof terrace would greatly improve the amenity of the building."*

5.3.3 Whilst the proposed roof additions may "*greatly improve the amenity*" of the application building, the scheme neglects the implications of this development on the neighbouring Grade I listed building and its existing amenity. The existing roof terrace at the Ned building serves as a significant amenity space for the hotel's occupants. Currently, the applicant's building does not obstruct the outlook (available to the hotel guests and visitors) towards St. Paul's Cathedral and other nearby landmark buildings. The proposed new extension, characterised by substantial bulk and mass over two stories will have a profoundly detrimental effect on the amenity value of the Ned Hotel roof terrace, severely compromising the currently uninterrupted outlook, thereby adversely impacting the setting of this designated listed building. The proposed architectural form, scale and façade treatment exhibit a disregard for the aesthetic qualities of both the host building and the surrounding heritage assets.

5.4 LOCAL PLAN (2015) and EMERGING LOCALPLAN 2040

5.4.1 Local Plan, Strategic Policy S11: Historic Environment policy, state:

"The City's historic environment will be protected, celebrated and positively managed by:

1. Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets.
2. Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness.
3. Seeking wider social, cultural, economic and environmental benefits by:
a. placing heritage at the heart of placemaking and delivering high quality buildings and spaces which enrich and enhance the settings of heritage assets.
b. encouraging the beneficial, continued use of heritage assets through sensitive adaptation that is consistent with their conservation and enhancement, including those on Historic England's Heritage at Risk Register.
c. encouraging heritage-led regeneration by identifying opportunities to draw on the contribution made by the historic environment to the character and identity of the place.

d. encouraging sensitive sustainable retrofit of designated as well as non-designated heritage assets and improvements that would benefit climate resilience and adaptation.
e. encouraging sites adjacent to and near heritage assets to work collaboratively with owners and operators of heritage assets to seek improvements to environmental performance, accessibility or other aspects of the functioning of heritage assets that are challenging to address.
f. Seeking enhanced public access and interpretation of the City's cultural and heritage assets, ensuring that opportunities to experience and enjoy the City's heritage and culture is available to a wide and diverse audience in a way that is socially and economically inclusive;

5.4.2 Contrary to policy S11, the proposed roof extension due to its height, scale, form bulk and materiality does not contribute to "*conserving and enhancing neighbouring heritage assets and their settings*". No evidence is provided of how the significance of the Grade I Listed Ned building will be "*better revealed*" by this development, or that it reflects or enhances the local character and distinctiveness.

5.4.3 The proposed development also fails to meet the tenets of the policy S11 section 3 (s*eeking wider social, cultural, economic and environmental benefit)*, as the scheme does not appear to be "placing *heritage at the heart of placemaking"* nor does it *"enrich and enhance the setting of heritage assets."*

5.4.4 Rather than encouraging the beneficial continued use of the Ned Hotel building (its roof terrace being considerable asset to its significance)*,* the proposed scheme disregards the important role and the significance of the existing roof terrace and its visual relationship with St Paul's Cathedral and Church of St Mary Le Bow experienced by the visitors. The complete loss of the outlook towards the above-mentioned historic buildings confirms that the proposed design is unsympathetic to its historic context and has no regards to the sensitivity of the Grade I Listed neighbouring building. Therefore, the proposals have detrimental impact upon significance and setting of this heritage asset,

6.0 CONCLUSION

6.1 The development site is adjacent to Grade I Listed former Midland Bank building, both located within Bank Conservation area of the City of London Local Authority. It also borders with Guildhall Conservation Area. The site is also near the Grade II* No.1 Poultry building and other designated heritage assets.

6.2 Constructed in 2005, the application site is a neutral contributor to the Bank Conservation Area. The proposed scheme involves internal and external upgrade of the building's fabric, including alterations to the ground floor, existing fenestration, floor plan adjustments, and addition of two roof storeys, housing new "pavilion" with new roof terrace, and new plant within an enclosure above.

6.3 Due to its height, scale, massing and materiality we consider proposed two-storey roof extension to be harmful to the significance of the neighbouring Grade I listed building and its setting. There appears to be no benefit to the Bank or Guildhall Conservation Area by means of either preservation or enhancement. The proposed additions do not respect or reflect prevalent architectural vocabulary or materiality of the surrounding buildings, involving use of dark timber cladding and dark brass finishes appearing alien to the host building and neighbouring Grade I listed building, which both have Portland stone facades.

6.6 The proposed roof extension appears dominant and unsympathetic, failing to appreciate the setting of the adjacent listed building and the significance of its amenity area. It is visually obtrusive, resulting in complete loss of the outlook towards the St Pauls Cathedral and Church of St Mary le Bow, which is currently enjoyed by thousands of guests and visitors to the Ned Hotel.

6.7 For the above reasons we object to the proposals 1 Old Jewry as they would cause harm to the significance of identified heritage assets, and thus, the proposals are not "*sustainable"* as defined by NPPF. We believe that the "public benefit" required to mitigate such harm and therefore have not been demonstrated sufficiently. The proposals do not fully comply with the requirements of national or local heritage planning policies and should not be approved.

Ms Anastasia Tampouridou - Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270, Guildhall
London EC2P 2EJ

Anastasia.Tampouridou@cityoflondon.gov.uk

25th January 2025

Dear Ms Tampouridou,

Objection Letter to Planning Application 24/00226/FULL 1 Old Jewry, London EC2R 8DN

I am writing to object to the above planning application which seeks to change the use of part of the ground floor retail space to be used for office accommodation, refurbishment works at basement and ground floor levels and the construction of a new pavilion and plant room at roof level including the creation of an external roof terrace.

I led the re-development of 27 Poultry into The Ned hotel between 2013 and 2017. We restored the Grade 1 listed building designed by Sir Edwin Lutyens creating a hotel and members club thereby conserving the building for future generations as well as opening up what had been a private building to provide amenity spaces and access to the building. The scheme also involved the removal of some ugly rooftop plant spaces and the provision of an accessible rooftop that provided an immersive view of the City as well a visual connection to St Pauls Cathedral.

This rooftop space and the views from it were supported by the City as a positive move in the conservation of 27 Poultry and indeed the entire alteration and refurbishment project was commended by the City of London with the presentation of a Heritage award.

I do not think the design of the proposed development respects the setting of the Ned hotel and nor is it appropriate to the setting of 1 Poultry which is Grade II* listed and directly opposite the development. Currently the applicants building appears as neutral in terms of its impact on both listed buildings and as a contributor to the conservation area. However, the roof top extensions proposed will result in the applicants building becoming taller than the Ned and suddenly the setting of the listed building and the benefits of its rooftop amenity will be seriously and harmfully affected.

The applicant has failed to adequately assess the rooftop extensions in the context of the neighbouring listed buildings and the street views are not a true representation of the impact of the development on the conservation area.

The impact of the proposed rooftop extension which I believe to be harmful to the setting of the listed buildings as well as the conservation area cannot be justified by the benefits being offered by the applicant's development. Whilst the improvement to the energy efficiency is of course welcomed the remainder of the development does not provide any social, cultural or economic benefit to justify the harm that is caused.

The development also reduces the amount of street facing retail space on Cheapside which is really the “High Street” of the City of London. This is reducing the accessibility of the building to retail users and is detrimental to the community that work and reside in the City of London.

The applicant has made no attempt at any public or neighbourly consultation which is contrary to the guidance published by the City of London. The first engagement made was during the judicial review period and was instigated by myself and the Ned operations team.

During meetings between the applicant and the owners and operators of the Ned hotel we sought to work positively and proactively with them and suggested alternative ways to design the extension to mitigate the impact on the neighbouring and adjacent listed buildngs. However, it was clear in our final meeting in early December that the applicant was not going to consider altering the bulk and mass of the rooftop extension and indeed the following day the application was launched again with addition of a few further supporting documents and no material changes to the design.

Due to the impact of the proposed development on the listing buildings and the conservation area coupled with the lack of community engagement I hope that the City of London will seek to re-engage with Historic England over the perceived impacts as well as give other organisations such as the 20th Century Society the opportunity to provide their views on the application.

Finally, I hope that officers will present this application to the Planning Committee so that the application is thoroughly debated and discussed.

Sincerely



Stuart Adolph
2 Nightingale Close Tring Herts HP23 5FS

SOHO HOUSE

Ms Anastasia Tampouridou
Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00226/FULL

24 January 2025

By Email:
Anastasia.Tampouridou@cityoflondon.gov.uk

Dear Ms Tampouridou

Objection to planning application with reference 24/00226/FULL
1 Old Jewry, London EC2R 8DN

1. Introduction

1.1 Ned-Soho House LLP (**Soho House**), under a long-term hotel management agreement with Poultry Opco Limited (**the Tenant**), operate the Grade 1 listed former Midland Bank headquarters building at 27 Poultry, London, EC2R 8AJ as the five star hotel known as the Ned Hotel (**the Ned Hotel**). The Ned Hotel is immediately to the east of 1 Old Jewry, London EC2R 8DR (the **Property**). The Ned Hotel provides, amongst other things, hotel guest accommodation and a private members club (**Ned's Club**). Members of the Ned's Club have access to a range of private facilities including a rooftop pool and terraces.

1.2 We write in respect of the application for full planning permission with reference 24/00226/FULL (the **Application**) made in respect of the Property to the City of London (the **City**) on behalf of Deka Immobilien Investment GmbH (the **Applicant**) on 01 March 2024 for:

> "*The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace*" (the **Proposed Development**).

1.3 The City granted the Application planning permission on 15 July 2024. However, the City's decision was quashed on 04 December 2024 following a claim for judicial review brought jointly by Our Client and the tenant of the Ned Hotel.

1.4 The Applicant's agent submitted updated information in respect of the Application the next day, on 05 December 2024. The Application will be reconsulted on and redetermined by the City. The Proposed Development has not been altered by the Applicant and remains the same as the original submission.

1.5 We request that the Council refuse the Application for the reasons detailed in this letter, which include:

1.5.1 the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts;

1.5.2 the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

1.5.3 the Application fails to correctly assess the daylight and sunlight impacts;

1.5.4 the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application;

1.5.5 lack of adequate community engagement on the Proposed Development;

1.5.6 the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; and

1.5.7 the construction of the Proposed Development has not been properly considered and results in unacceptable negative impacts and risks for pedestrians, cyclists and other users of Poultry and Grocers Hall Court.

2. The City's Development Plan

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. As at the date of this letter, the Council's development plan includes the following documents relevant to the Proposed Development:

2.1.1 City of London Local Plan adopted January 2015 (**Local Plan**);

2.1.2 City Plan 2040 Revised Proposed Submission Draft dated April 2024 (**Draft City Plan**);

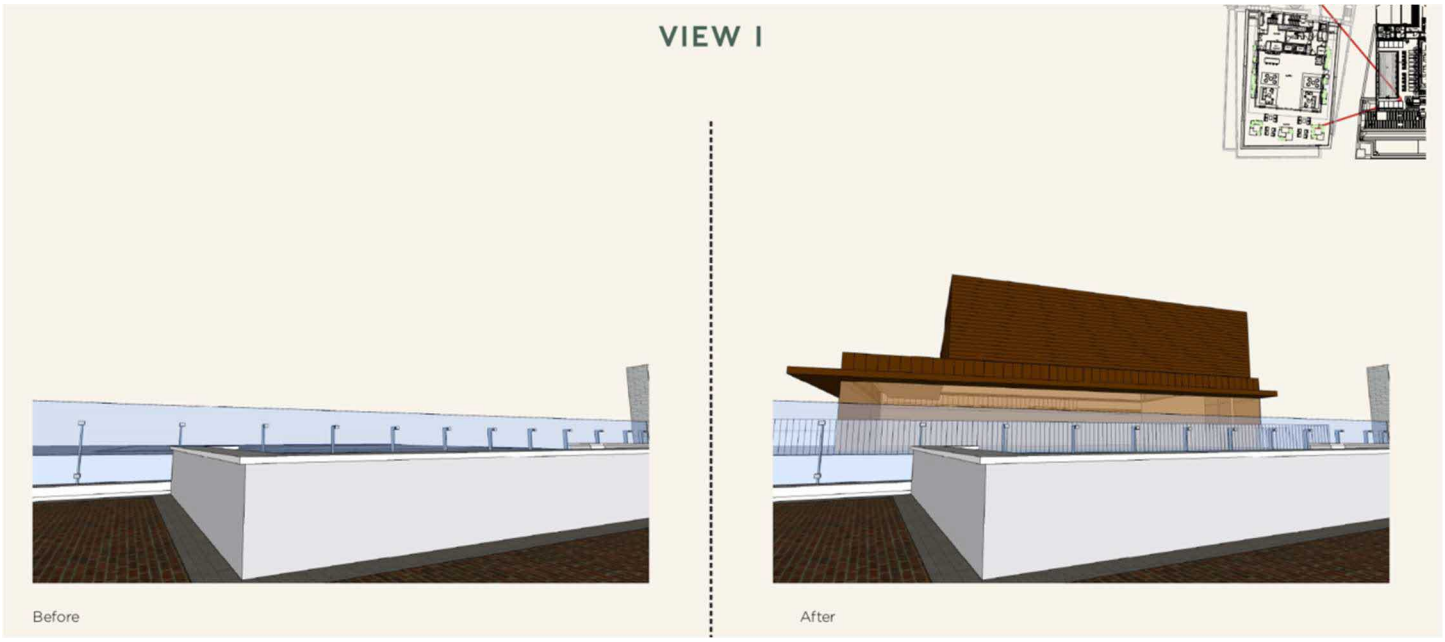
2.1.3 The London Plan adopted March 2021 (**London Plan**);

2.1.4 the City's Developer Engagement Guidance dated May 2023 (**Developer Engagement Guidance**); and

2.1.5 the City's Statement of Community Involvement dated July 2024 (**SCI**).

3. Unacceptable impact on the Ned Hotel's business

3.1 The Proposed Development is unacceptably dominant and would result in a significant overlooking of the roof terrace of the Ned Hotel and a distinct reduction in the privacy currently enjoyed by the open space amenity area. Please see the visualisation of the impact of the Proposed Development on the Ned Hotel's rooftop amenity area (specifically the pool area) below:



3.2 The Ned Hotel's rooftop includes private amenity facilities, including restaurants, bars and swimming pool for the use of members of the Ned's Club. The privacy and exclusiveness of the rooftop is a key reason that some members join the Ned's Club. The rooftop is currently not overlooked by any surrounding buildings.

3.3 The Proposed Development would significantly overlook the Ned Hotel's rooftop which is likely to result in a reduction in the number of Ned's Club members due to negative impact on the rooftop's privacy. This would be of economic detriment to the Ned Hotel.

3.4 Given that the Ned Hotel's rooftop and the Property are only several metres apart, including hotel rooms with windows looking onto Grocers Hall Court, it is also expected that the Proposed Development's terrace and plant enclosure will have a significant

negative impact on the Ned Hotel in terms of noise. This is a particular concern for users of the Ned Hotel's hotel rooms, function rooms (which are used for weddings) and the rooftop area.

3.5 Deepening our concerns, the hours of use of the scheme (including the terrace) are not specified. For example, if music / catering / alcohol is allowed on the terrace or the terrace will remain open for extended hours, then this poses potential noise / disturbance issues to the Ned (including the Ned's hotel guests).

3.6 Soho House, as the operator and designer for circa. 50 (as of writing) Soho House and Ned hotels and members clubs around the world has extensive experience dealing with the development and refurbishment of sensitive buildings, including the Ned itself. This includes measures to mitigate the visual/design, space and noise impacts of plant and equipment. The Application (via the Design and Access Statement) notes the following:

3.6.1 "*Unfortunately the stringent requirements of the plant screen in terms of free area and acoustic performance limit the options for the architectural expression. In order to ensure the least visual impact given these performance requirements, we have chosen a high quality acoustic louvre and focussed on high quality detailing (like the frameless corners).*" *(page 75)*

3.6.2 "*Through the design development we have sought to optimise the split of plant between the basement and the rooftop levels and are unable to see any further opportunities to improve the rooftop mass. …Unfortunately this means that it is not feasible to reduce the rooftop plant area further by relocating plant equipment to the basement.*"

3.7 In our view (and based on our experience), these statements may not be correct. They also fail to acknowledge that there are likely to be other massing/space configurations which do mitigate the visual, design and acoustic impacts of the Proposed Development. For example, some plant could be installed in a portion of the upper-most office floor. At a meeting with the Applicant / Applicant's Agent (see paragraph 7.3 below), we understand that the Tenant offered to discuss and work with the Application to consider some potential alternatives. However, as also commented below, the Applicant has made clear their intention not to make any changes nor engage in any consultative process in this regard.

3.8 The Proposed Development has a disproportionately negative impact on the Ned Hotel and surrounding area and the Application should therefore be refused.

4. Unacceptable impact on daylight and sunlight

4.1 Policy DM10.7 of the Local Plan provides for how daylight and sunlight should be considered in determining applications. It states that (emphasis added):

"**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."

4.2 The Local Plan defines "open spaces" as "*Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.*"

4.3 Furthermore, Draft City Plan policy DE7 requires development proposals to demonstrate that the daylight and sunlight available to "*nearby dwellings and other sensitive receptors including schools, hospitals, **hotels** and hostels, places of worship and **open spaces**…is appropriate for its context and provides acceptable standards of daylight and sunlight*" (emphasis added).

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4.5 As of December 2024, the Application is now accompanied by a daylight and sunlight report prepared by Point 2 Surveyors Limited dated October 2024 (**the D&S Report**). However, contrary to the City's Pre-App Response which required the impact on the surrounding buildings (plural) to be assessed, the Application only considers the impact of the Proposed Development on the Ned Hotel.

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4.7 The D&S Report fails to consider the daylight and sunlight impact of the Proposed Development on the private amenity space provided by the Ned Hotel's rooftop area which amounts to "open space". This is contrary to Local Plan policy DM10.7 and Draft City Plan policy DE7.

5. Inappropriate design

5.1 The Proposed Development should be refused because it is not of a high standard of design and harms the townscape and public realm contrary to Local Plan policy DM 10.1 on the basis that:

5.1.1 The bulk and massing are not appropriate in relation to the surroundings. The Proposed Development does not have due regard to the general scale, height, building lines, character and historic interest, urban grain and materials of the locality.

5.1.2 The Application does not demonstrate that there will not be unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding buildings and public realm.

5.1.3 The design of the roof is not visually integrated into the overall design of the buildings when seen from street level or higher-level viewpoints. The plant enclosure and pavilion, in particular, are visually jarring and unintegrated.

5.1.4 Plant and building services equipment are not integrated into the design of the building. The plant room and pavilion adversely affect the character, appearance and amenities of the buildings and the area.

5.2 Paragraph 3.10.11 of the Local Plan states that “Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the buildings as viewed from surrounding buildings”. The roofscape of the Proposed Development is incongruous with the surrounding rooflines, is overly dominant and out of character to the existing area. The view of the Proposed Development and the roofscape from surrounding buildings such as the Ned Hotel cannot be said to complement the surrounding buildings. The Proposed Development arguably harms the setting of the Grade I listed Ned Hotel, the Bank Conservation Area and the adjacent Guildhall Conservation Area.

6. Loss of retail floorspace

6.1 The Property is located within a Principal Shopping Centre (Cheapside). Local Plan policy DM 20.1 resists the loss of retail frontage and floorspace adding that additional retail provision is encouraged. Similarly, Draft City Plan policy RE1 states that loss of ground floor retail frontages and/or floorspace will be resisted.

6.2 Paragraphs 3.26 of the Planning Statement state that the Proposed Development would result in a reduction of commercial floorspace of 523 sqm –including a reduction of 150 sqm of retail floorspace on ground floor level. This reduction in retail frontage

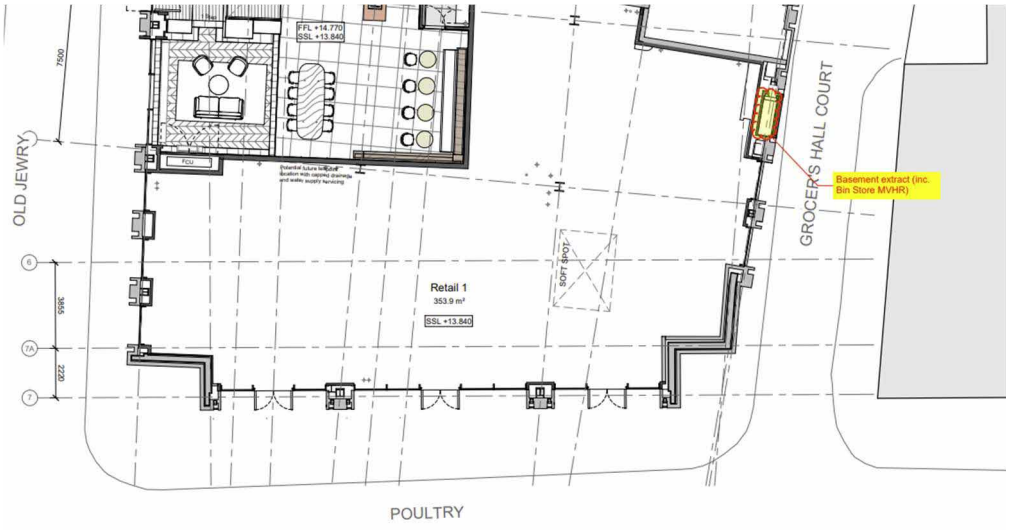
and floorspace is contrary to Local Plan policy DM 20.1 and Draft City Plan RE1 and the Application should be refused.

6.3 The Application does not appear to comply with the City's pre-application advice of 28 April 2023 (**Pre-App Response 1**) which states that:

> "*Local policies do not support the loss of ground floor retails [sic] floorspace within Principal Shopping Centres. However, as discussed in our pre-application meeting, there may be scope to retain the existing retail frontage and number of units but make changes to the depth of Retail Unit 1 to accommodate a larger office reception. This would need to be supported by robust justification which demonstrates that a smaller retail unit would be viable in this PSC location*" and "***As a starting point the principle of development, involving the loss of retail floorspace and frontage in the PSC is not supported***" (emphasis added).

6.4 In a second pre-application response of 18 December 2023 (**Pre-App Response 2**) the City stated that "*a viability statement should be submitted as part of any application to support the proposal in line with the Draft City [Plan] policy RE1" noting that the "Draft City Plan highlights Old Jewry as a key retail link.*"

6.5 The proposed ground floor arrangement plan with drawing number 6982-SRA-XX-00-DR-A-20100 Rev. P06 shows only one retail unit on the ground floor "Retail 1" indicating the loss of two retail units (see extract below). It is also noted that the entrance doors to retail units open out onto public highway contrary to the City's Pre-App Response 1 as also shown in the extract below:



6.6 The Application does not provide a robust justification for the loss of two retail units at ground floor or evidence that one larger retail unit would be more viable than three smaller units. This is contrary to the Pre-App Response 1, Pre-App Response 2, Local Plan policy DM 20.1 and Draft City Plan policy RE1.

7. Lack of adequate community engagement

7.1 The Application, as of December 2024, is now accompanied by a one-page engagement strategy prepared by Savills (**Engagement Strategy**) which sets out that prior to the submission of the Application, two pre-application meetings took place with the City's planning officers. The Application does not demonstrate that the Applicant attempted to obtain any views from the local community or local stakeholders.

7.2 The Application does not include a statement of community involvement, despite this being requested by the City at pre-application stage and contrary to the Developer Engagement Guidance. The Applicant has not demonstrated that they have had any regard to the City's Developer Engagement Guidance or the City's Statement of Community Involvement. The lack of engagement and consultation was one of the grounds provided in the claim for judicial review in respect of the Application.

7.3 The Engagement Statement sets out the dates of three "dedicated meetings" between the Applicant / the Applicant's agent, the landlord and tenant during which it is claimed that the Applicant sought to work positively and proactively with the landlord and tenant. However, we understand that it was made clear to the landlord and tenant that the Applicant would not make changes to the Proposed Development despite the landlord and tenant's best efforts to work with the Applicant to find amendments to the scheme to mitigate the Proposed Development's numerous negative impacts on the Grade I listed Ned Hotel and surrounding Conservation Areas. In our view, this highlights the insincerity of these interactions, as well as the disregard for meaningful community engagement by the Applicant / Applicant's agent.

7.4 The consent order formally quashing the previous decision was granted by the Court on 4 December 2024. The covering letter re-submitting the Application for re-determination is dated the next day –the 5 December 2024 (the **Cover Letter**). The Cover Letter sets out that other than the addition of an overshadowing assessment and a daylight and sunlight report, there are "*no other changes to the [P]roposed [D]evelopment*".

7.5 We do not consider that the Applicant intended to make any amendments to the Proposed Development, as is evidenced by the lack of any amendments to the Application following re-submission.

8. Deficiencies in the Site Location Plan

8.1 The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015) at article 7(1)(c)(i) requires planning applications to be accompanied by a plan identifying the relevant land subject to the Application. Government guidance states that the location plan "should include all land necessary

to carry out the proposed development (eg land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings)."

8.2 The site location plan drawing number 6982-SRA-XX-XX-DR-A-02100 Rev P01 dated 19 February 2024 (the Site Location Plan) does not meet the validation criteria as the red line does not include all land necessary to carry out the Proposed Development as the red line does not include:

8.2.1 land needed for construction vehicles and works to take place;

8.2.2 space for storage of construction materials, construction vehicles or welfare offices.

9. Unacceptable impact of Construction

9.1 Taken together, the deficiencies in the Site Location Plan, the lack of community engagement, the refusal to engage in sincere, meaningful discussions with the landlord and tenant and the lack of consultation with Soho House (as operator) also highlight the lack of consideration given to the construction of the development.

9.2 The site is extremely constrained. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is in constant use by many commercial operators (servicing Grocers' Hall and The Ned), in addition to construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period. The narrow, busy service road already causes vehicles to wait on Poultry, blocking the bus stop and giving rise to safety concerns.

9.3 The Application also does not provide sufficient detail on how the development would be constructed. For example, would cranes be needed, how would waste material be disposed of, how would hazardous materials be stored (on or off-site)?

9.4 We anticipate that the Proposed Development will have material, disproportionately negative impacts on traffic, means of access and pedestrian and cyclist safety and the Application should, therefore, be refused.

10. Conclusion

10.1 For the reasons set out in this letter the Application should be refused.

10.2 The lack of any good faith engagement by the Applicant with the public and key stakeholders is concerning. We urge the City to determine the Application by planning committee so that the Application is thoroughly debated and discussed.

10.3 Kindly acknowledge receipt of this letter of objection in writing.

Yours sincerely



For and on behalf of Soho House

THE NED
CITY OF LONDON

Ms Anastasia Tampouridou
Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00226/FULL

Email: [redacted]

27 January 2025

By Email:
Anastasia.Tampouridou@cityoflondon.gov.uk

Dear Ms Tampouridou

Objection to planning application with reference 24/00226/FULL
1 Old Jewry, London EC2R 8DN

1. Introduction

1.1 Poultry Opco Limited (**the Tenant**), leases and operates the Grade 1 listed former Midland Bank headquarters building at 27 Poultry, London, EC2R 8AJ as the five star hotel known as the Ned Hotel (**the Ned Hotel**). The Ned Hotel is immediately to the east of 1 Old Jewry, London EC2R 8DR (the **Property**). The Ned Hotel provides, amongst other things, hotel guest accommodation and a private members club (**Ned's Club**). Members of the Ned's Club have access to a range of private facilities including a rooftop pool and terraces.

1.2 We write in respect of the application for full planning permission with reference 24/00226/FULL (the **Application**) made in respect of the Property to the City of London (the **City**) on behalf of Deka Immobilien Investment GmbH (the **Applicant**) on 01 March 2024 for:

> "*The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of*

commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace" (the **Proposed Development**).

1.3 The City granted the Application planning permission on 15 July 2024. However, the City's decision was quashed on 04 December 2024 following a claim for judicial review brought jointly by our Landlord and ourselves as operators of the Ned Hotel.

1.4 The Applicant's agent submitted updated information in respect of the Application the next day, on 05 December 2024. The Application will be reconsulted on and redetermined by the City. The Proposed Development has not been altered by the Applicant and remains the same as the original submission.

1.5 We request that the Council refuse the Application for the reasons detailed in this letter, which include:

1.5.1 the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts;

1.5.2 the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

1.5.3 the Application fails to correctly assess the daylight and sunlight impacts;

1.5.4 the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application;

1.5.5 lack of adequate community engagement on the Proposed Development;

1.5.6 the Proposed Development harms surrounding heritage assets;

1.5.7 the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; and

1.5.8 the construction of the Proposed Development has not been properly considered and results in unacceptable negative impacts and risks for pedestrians, cyclists and other users of Poultry and Grocers Hall Court.

2. The City's Development Plan

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. As at the date of this letter, the Council's development plan includes the following documents relevant to the Proposed Development:

2.1.1 City of London Local Plan adopted January 2015 (**Local Plan**);

2.1.2 City Plan 2040 Revised Proposed Submission Draft dated April 2024 (**Draft City Plan**);

2.1.3 The London Plan adopted March 2021 (**London Plan**);

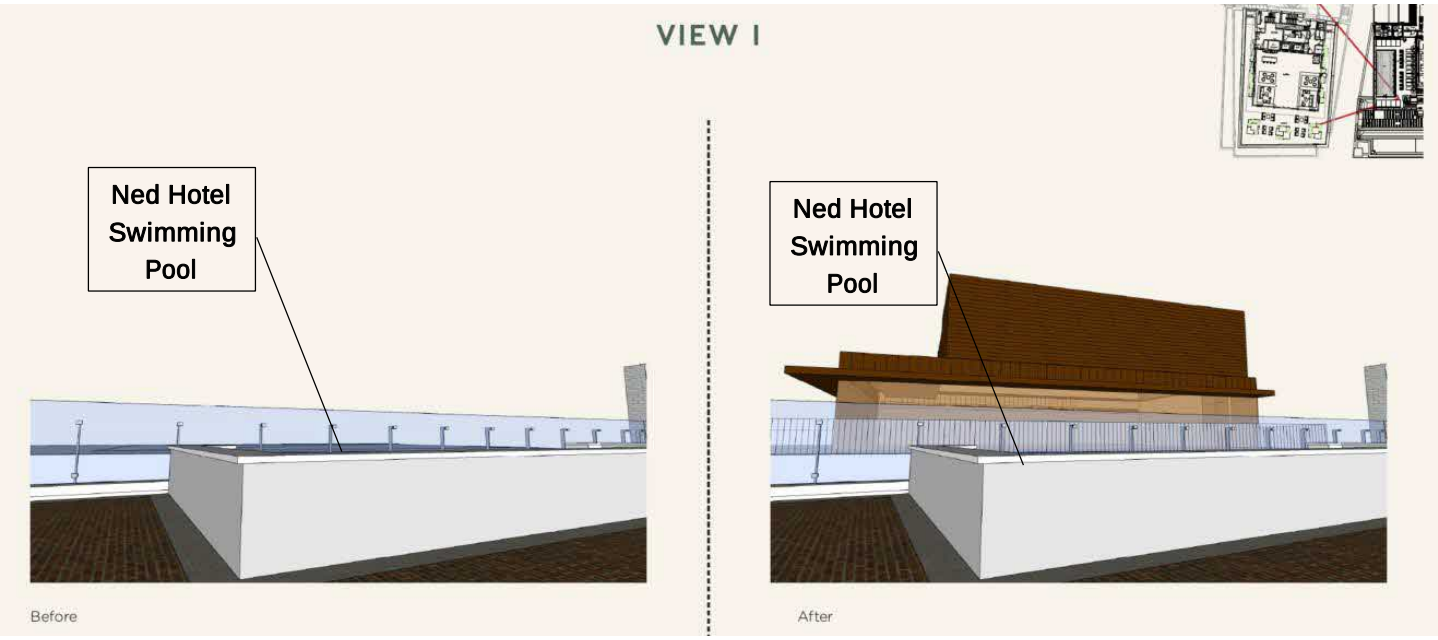
2.1.4 the City's Developer Engagement Guidance dated May 2023 (**Developer Engagement Guidance**); and

2.1.5 the City's Statement of Community Involvement dated July 2024 (**SCI**).

3. Unacceptable impact on the Ned Hotel's business

3.1 The Ned Hotel's rooftop includes private amenity facilities, including restaurants, bars and swimming pool for the use of members of the Ned's Club. The privacy and exclusiveness of the rooftop is a key reason that some members join the Ned's Club. The rooftop is currently not overlooked by any surrounding buildings.

3.2 We set out below the visualisation of the impact of the Proposed Development on the Ned Hotel's rooftop amenity area (specifically the pool area) below:



3.3 As can be seen, would significantly overlook the Ned Hotel's rooftop. The Proposed Development is unacceptably dominant and would result in a significant reduction in the privacy currently enjoyed by the open space amenity area. This will likely to result in a reduction in the number of Ned's Club members due to negative impact on the rooftop's privacy. This would be of economic detriment to the Ned Hotel and therefore the conservation of the Grade 1 listed building..

3.4 Given that the Ned Hotel's rooftop and the Property are only several metres apart, including hotel rooms with windows looking onto Grocers Hall Court, it is also expected that the Proposed Development's terrace and plant enclosure will have a significant negative impact on the Ned Hotel in terms of noise. This is a particular concern for users of the Ned Hotel's hotel rooms, function rooms (which are used for weddings) and the rooftop area.

3.5 Deepening our concerns, the hours of use of the scheme (including the terrace) are not specified. For example, if music / catering / alcohol is allowed on the terrace or the terrace will remain open for extended hours, then this poses potential noise / disturbance issues to the Ned (including the Ned's hotel guests).

3.6 As a group, we are significant owners and developers of hotels and members clubs around the world. Within the Ned Group we have extensive experience dealing with the

development and refurbishment of sensitive buildings, including the Ned itself. This includes measures to mitigate the visual/design, space and noise impacts of plant and equipment. The Application (via the Design and Access Statement) notes the following:

3.6.1 "*Unfortunately the stringent requirements of the plant screen in terms of free area and acoustic performance limit the options for the architectural expression. In order to ensure the least visual impact given these performance requirements, we have chosen a high quality acoustic louvre and focussed on high quality detailing (like the frameless corners)." (page 75)*

3.6.2 "*Through the design development we have sought to optimise the split of plant between the basement and the rooftop levels and are unable to see any further opportunities to improve the rooftop mass. … Unfortunately this means that it is not feasible to reduce the rooftop plant area further by relocating plant equipment to the basement."*

3.7 In our view (and based on our experience), these statements may not be correct. They fail to acknowledge that there are likely to be other massing/space configurations which do mitigate the visual, design and acoustic impacts of the Proposed Development. For example, some plant could be installed in a portion of the upper-most office floor.

3.8 We are therefore extremely concerned that the Applicant's approach represents a cynical attempt to use environmental and energy performance rules to justify a purely commercial objective: material increases to the floorspace and extension of the height of the Property through the addition of the pavilion and terrace.

3.9 At a meeting with the Applicant / Applicant's Agent (see paragraph 7.3 below), we understand that the Tenant offered to discuss and work with the Application to consider some potential alternatives. However, as also commented below, the Applicant has made clear their intention not to make any changes nor engage in any consultative process in this regard.

3.10 The Proposed Development has a disproportionately negative impact on the Ned Hotel and surrounding area and the Application should therefore be refused.

4. Unacceptable impact on daylight and sunlight

4.1 Policy DM10.7 of the Local Plan provides for how daylight and sunlight should be considered in determining applications. It states that (emphasis added):

"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.
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4.5 As of December 2024, the Application is now accompanied by a daylight and sunlight report prepared by Point 2 Surveyors Limited dated October 2024 (**the D&S Report**). However, contrary to the City's Pre-App Response which required the impact on the surrounding building**s** (plural) to be assessed, the Application only considers the impact of the Proposed Development on the Ned Hotel.

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4.7 The D&S Report fails to consider the daylight and sunlight impact of the Proposed Development on the private amenity space provided by the Ned Hotel's rooftop area which amounts to "open space". This is contrary to Local Plan policy DM10.7 and Draft City Plan policy DE7.

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5.1 The Proposed Development should be refused because it is not of a high standard of design and harms the townscape and public realm contrary to Local Plan policy DM 10.1 on the basis that:

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5.3 As also noted in paragraph 3.8 above, we are also highly concerned by the use of environmental and energy performance regulations as justification for these inappropriately designed and excessive extensions. If accepted, the Application would set a worrying precedent which we would expect other local building owners to try to follow.

6. Harm to heritage assets

6.1 MVHC has been commissioned to review the impact of the Proposed Development on the surrounding heritage assets and objects to the Application. MVHC's review states that the Ned Hotel (being the former Midland Bank headquarters) is of exceptional architectural and historic interest, featuring outstanding architectural composition. The Ned Hotel is understandably listed as a Grade I listed building.

6.2 MVHC state that the Proposed Development's increased height, bulk, scale and materiality have a harmful effect on the neighbouring Grade I listed building (the Ned Hotel) and Grade II* listed 1 Poultry. Specifically, the height and massing of the proposed additions will appear unacceptably dominant and bulky, carrying little regard to the height of the designated heritage assets in the Property's immediate vicinity.

6.3 MVHC's objection also notes that whilst the proposed roof extension may be of limited visibility when viewed from street-level vantage points, the impact on the sensitivity of the Grade I listed Ned Hotel building , in particular its outlook towards St Pauls Cathedral and St Mary-le-Bow Church, will be substantial.

6.4 The Proposed Development significantly harms the setting and outlook of surrounding heritage assets and fails to have due regard to the requirements of The Planning (Listed Buildings and Conservation Areas) Act 1990 sections 66(1) and 72(1) and the requirements of policy DM12.1 of the London Plan. We agree with the conclusion of MVHC's review that the Application should be refused.

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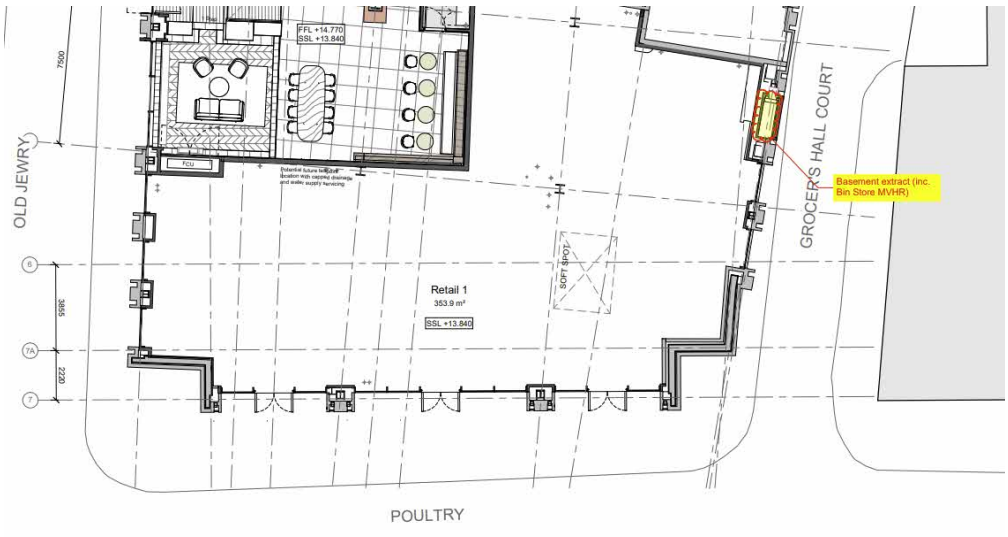
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11.3 Kindly acknowledge receipt of this letter of objection in writing.

Yours sincerely



Gareth Banner

Group Managing Director

On behalf of

Poultry Opco Limited

Douglas Marvin
87 Lambton Road
London
SW20 0LW

27 January 2025

Ms Anastasia Tampouridou - Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270, Guildhall
London EC2P 2EJ

Anastasia.Tampouridou@cityoflondon.gov.uk

Dear Ms Tempouridou,

Objection Letter to Planning Application 24/00226/FULL 1 Old Jewry, London EC2R 8DN

I am writing to object to the above planning application which seeks to change the use of part of the ground floor retail space to be used for office accommodation, refurbishment works at basement and ground floor levels and the construction of a new pavilion and plant room at roof level including the creation of an external roof terrace.

I am a member of the Ned's Club, part of the Ned Hotel. I use the facilities frequently, including the rooftop. One of the main attractions of the rooftop is the privacy it affords, particularly the rooftop and for use of the swimming pool. The proposed rooftop extension will overlook the Ned hotel's rooftop. I am very concerned by the significant impact the proposed construction of the new pavilion and roof terrace will have on this privacy. I understand that it will be used for various functions and events and therefore I am also concerned about the noise that will be generated from the rooftop extension,

I do not think the design of the proposed development respects the setting of the Ned hotel, a Grade I listed building, which is of exceptional interest as only around 2.5% of listed buildings are Grade I. The hotel is also in a conservation area. In combination this means that even more importance should be given to ensuring that the proposed design of the rooftop extension is appropriate, being so close to a Grade I listed building in a conservation area. The bulk and scale of the proposed development will have a detrimental effect on the conservation area and the setting of the Ned hotel.

There are also a number of architecturally significant buildings next to and around 1 Old Jewry, including the Ned Hotel building (27 Poultry) and No. 1 Poultry, designed by James Stirling. The proposed design is certainly not consistent with the quality and visual appeal of these buildings or the wider area. One would expect that new developments / extensions should enhance or build upon the beautiful neighbourhood. Or, at worst, they should provide a neutral backdrop for these buildings. Neither of these standards is met by the proposed development; I believe it would have an overwhelmingly negative impact on the area. It is also noteworthy that the planning application fails to even consider the visual or design impact of the rooftop extension on the surrounding buildings and area.

Finally, also object to the planning objection on two further grounds:

1. No consideration has been given to the construction of the development and how constrained the site is. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is used by many commercial operators and by

construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period. In particular, I regularly commute by bicycle and could foresee a dangerous situation being created for cyclists and pedestrians; and

2. I am aware that the applicant refers to having met with the owners of the Ned hotel and that they have sought to work positively and proactively with them. I cannot therefore understand why this planning application is no different to the previous scheme and takes no account of the overlooking and inappropriate bulk and scale of the rooftop extension. This is a major planning application. The lack of any real engagement by the planning applicant with the public is concerning and I hope that Planning Committee can consider the matter so that the application is thoroughly debated and discussed.

Yours sincerely,

Douglas Marvin

87 Lambton Road
London
SW20 0LW

Comments for Planning Application 24/00226/FULL

Application Summary

Application Number: 24/00226/FULL
Address: 1 Old Jewry London EC2R 8DN
Proposal: The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revised access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace. (Re-consultation due to amended documents received 14 March 2025.)
Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Benjamin Peacock
Address: Flat 147 Warehouse Court Major Draper Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:Various aspects of this scheme contravene the for the City of London's planning policy or negatively impact on the visual attractiveness of a conservation area. Notably, this includes:
1. Loss of retail space on the ground floor. There is a current high demand for such space in Central London and it would be a shame to lose further space to a scheme that does not take this into account. This area of the City especially has very little in the way of vacant retail units - something that will only be exacerbated as further office units which have already been given consent (numerous within walking distance to the site) are completed. Indeed, these seem to be a couple of the very limited number of vacant units in the City - which I can only assume is a choice to prioritise this development.
2. Given this is a conservation area, one would query the decision to place significant amounts of plant onto the roof of the development, which could be (and indeed under its current construction already is) located elsewhere within the development. The plant is not pleasing to the eye to say the least.
3. The current plans would overlook a public pool on the roof of an adjacent property, which is an invasion of privacy and reduces the benefit of an amenity which is rare for central London and should be protected.

It is for these reasons that I would urge the City to refuse the application.

FARRER&Co

Ms A Tampouridou
Case Officer
City of London
Development Division
Department of the Built Environment
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00226/FULL
Our Ref: 107110.1
Tel:
Fax:
Email:

13 May 2025

Dear Ms Tampouridou

Objection to planning application with reference 24/00226/FULL
Subject Land: 1 Old Jewry, London EC2R 8DN

1. Introduction

1.1 We continue to act on behalf of Vivas Invest & Finance Limited and Poultry Tenant Limited (**Client),** the respective owner and tenant of the Grade I listed former Midland Bank headquarters building which is used as the five-star Ned Hotel at 27 Poultry, London, EC2R 8AJ (**the Ned Hotel**).

1.2 We write in respect of the revised application for full planning permission with reference 24/00226/FULL (the **Application**) made in respect of the Subject Land to the City of London (the **City**) on behalf of Deka Immobilien Investment GmbH (the **Applicant**) on 14 March 2025 for:

"*The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace (Re-consultation due to amended documents received 14 March 2025.)*" (the **Proposed Development**).

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Ms A Tampouridou
13 May 2025

2. Background

2.1 The City granted the Application planning permission on 15 July 2024. However, the City's decision was quashed on 4 December 2024 following a claim for judicial review brought by our Client.

2.2 The Applicant's agent submitted updated information in respect of the Application the next day, on 5 December 2024. We responded to that updated information on behalf of our Client in a submission dated 23 January 2025. This submission, **enclosed** to this letter, should be read in full.

2.3 The Applicant has since responded with a revised Application submitted on 14 March 2025. The Applicant's agent, Savills, has submitted a cover letter dated 13 March 2025 that notes:

This correspondence provides details of minor amendments to the Proposed Development and a response to a series of matters raised during the latest round of consultation in respect of the application registered under Reference: 24/00226/FULL.

During the consultation period, a total of 11no [sic] *objections were received by the CoL. This response seeks to address relevant comments made in the representations and covers the following distinct topics:*

- *Matters of procedural compliance;*
- *Loss of retail;*
- *Impact on heritage assets; and*
- *Neighbourly matters.*

It also includes details of some minor revisions to the Proposed Development scheme which are now proposed by the Applicant. The physical changes are the result of continued engagement with The Ned Hotel and its advisors and have been designed to respond to its concerns.

2.4 The Application further contains:

2.4.1 Revised drawings of the Proposed Development on the 9th floor of the Subject Land;

2.4.2 A 'privacy screening pack' dated March 2025 prepared by Sheppard Robson;

2.4.3 A 'Written Scheme of Investigation for an Archaeological Excavation and Archaeological Monitoring and Recording' dated 7 March 2025, prepared by MOLA; and

2.4.4 A revised Application Form and CIL Form.

3. Objection

3.1 We request that the Council refuse the Application for the reasons detailed in this letter, which include:

3.1.1 the Site Location Plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements, and may encroach on third-party land without consent;

3.1.2 the loss of retail frontage and floorspace is contrary to planning policy;

3.1.3 the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

3.1.4 the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts;

3.1.5 the Proposed Development harms surrounding heritage assets;

3.1.6 the Application fails to correctly assess the daylight and sunlight impacts; and

3.1.7 lack of adequate community engagement on the Proposed Development.

4. Deficiencies in the Site Location Plan and encroachments on third-party land

4.1 The Town and Country Planning (Development Management Procedure) (England) Order 2015 (**DMPO 2015**) at article 7(1)(c)(i) requires planning applications to be accompanied by

a plan identifying the relevant land subject to the Application. Planning Practice Guidance states that the location plan "*should include all land necessary to carry out the Proposed Development (e.g. land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings).*" This language contains no caveats or carve-outs.

4.2 The site location plan drawing number 6982-SRA-XX-XX-DR-A-02100 Rev P01 dated 19 February 2024 (the **Site Location Plan**) does not meet the validation criteria as the red line does not include all land necessary to carry out the Proposed Development for:

4.2.1 land needed for construction vehicles and works to take place; and

4.2.2 space for storage of construction materials, construction vehicles or welfare offices.

4.3 The Applicant's agent, in their cover letter dated 13 March 2025, notes:

4.3.1 *"The Applicant fundamentally disagrees with this assertion. There is no requirement, nor is it standard practice, to include or incorporate land needed for construction-related purposes within the Site, nor to refer to them within the description of development. This is because The Town and Country Planning (General Permitted Development) (England) Order 2015 provides at Schedule 2, Part 4, Class A for:*

> *"The provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land."*

4.4 This assertion is fundamentally incorrect at law. Schedule 2, Part 4, Class A.1(b) of the Town and Country Planning (General Permitted Development) (England) Order 2015 provides that development is not permitted by Schedule 2, Part 4, Class A if planning permission is required for those operations but is not granted or deemed to be granted. Given the Applicant's agent asserts in its letter that *"the Applicant anticipates that permission would be granted subject to conditions which require the submission of details relevant to matters such management of construction,"* the Applicant cannot rely on Schedule 2, Part 4, Class A for

permitted development. That is, the Applicant acknowledges that planning permission is required for construction and staging works, and that such permission has not been granted or deemed to be granted.

4.5 This has been recognised in planning appeal decisions, with the Planning Inspectorate determining in APP/K1128/W/17/3187008 that an application is invalid if it fails to comply with these requirements. See relevant excerpts (emphasis added):

> 7. *Although illustrative, the submitted layout plan provides a clear indication of the manner in which the appellant is intending to develop the land. Specifically, it shows that certain elements within the description of development (notably the change of use of agricultural land to public open space and engineering works to create the visitor car park and accesses thereto) would lie outside of the red lined application site, despite being development requiring planning permission.* ***To accord with the PPG, the entire area should be included within the red line.***
>
> 8. ***Furthermore, the plan fails to identify all land necessary for access to the site from a public highway. The PPG stipulates that this is essential in order to meet national information requirements.*** *That the Council did not require the red line to extend to the highway for other sites in the locality is not relevant. S79 of the Town and Country Planning Act 1990 empowers the Secretary of State to deal with the application as if it had been made to him in the first instance. It follows that I am entitled to make a fresh judgement on validity.*
>
> 9. *There is no requirement under the Order for the appellant to provide details of any reserved matters. I note that the Council did not exercise its powers under Article 5(2) to require further details.* ***However, this does not alter the fact that the scheme does not accord with the PPG. I am mindful that the scheme would need a section of access road in order for the Proposed Development to function. Reliance upon a Grampian condition to secure access, particularly when ownership of the intervening land has not been proven, is not adequate.***

4.6 A Planning Inspectorate decision is a material planning consideration and needs to be considered by a local planning authority when determining an application.[1] We contend that if this appeal decision is applied, then failure to extend a redline to include construction and staging works, and to demonstrate access to a public highway, invalidates the Application. This means that the City is unable to consider the planning merits of the Application until the defects in the Application are resolved.

4.7 Further, the PPG provides that *"A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site"*. We do not cast any inferences as to why the Applicant has not chosen to do so with respect to the Site Location Plan. However, we note the following, based on title searches of the surrounding area:

4.7.1 The Subject Land borders our Client's property to the east and shares a main access road at Grocers' Hall Court.

4.7.2 The Subject Land borders 8-10 Old Jewry to the north, the freehold owners being The Wardens and Commonalty of the Mistery of Grocers of the City of London.

4.7.3 The Subject Land otherwise appears to be entirely surrounded by 'Charter Streets', as indicated by the caution against first registration on title NGL892913.

4.8 The Application documentation and the previous decision by the City in June 2024 does not appear to contain any indication as to how access on third-party land will be secured for the construction of the Proposed Development, such as a section 106 agreement or other mechanism. If there is a section 106 agreement being negotiated with the Applicant, then we note the recent High Court decision of *Greenfields (IOW) Limited v Isle of Wight Council* [2025] EWCA Civ 488 to the City, which confirmed at [53] – [70] that failure by the local planning authority to place a copy of a proposed or finalised section 106 agreement on the planning register prior to granting permission did result in the unlawfulness of the decision to issue planning permission.

[1] See *DLA Delivery Ltd v Baroness Cumberlege of Newick & Anor (Rev 1)* [2018] EWCA Civ 1305, *Solihull Metropolitan Borough Council v Gallagher Estates Ltd.* [2014] EWCA Civ 1610, *R. (on the application of Fox Strategic Land and Property Ltd.) v Secretary of State for Communities and Local Government* [2012] EWCA Civ 1198, *Dunster Properties Ltd. v First Secretary of State* [2007] 2 P. & C.R. 26, *R. v Secretary of State for the Environment, ex parte Baber* [1996] J.P.L. 1034, and *North Wiltshire District Council v Secretary of State for the Environment* (1993) 65 P. & C.R. 137.

4.9 Our Client is not minded to grant access to the Applicant as it opposes the Proposed Development. We are not instructed to act for any other adjoining landowners such as the Wardens and Commonalty of the Mistery of Grocers, but we have seen no evidence that they have consented to third-party access for the Proposed Development.

4.10 Further, Charter Streets have a unique and complex ownership that has been litigated in the past. If the Proposed Development encroaches on the Charter Streets (including the airspace), then evidence of a lease, transfer, licence or easement would need to be presented, given ownership of the Charter Streets lies with the City of London Corporation. We have seen no evidence that planning officers within the City are empowered to dispose of interests in the Charter Streets by way of a planning permission. Authority, even implied authority, to allow the Applicant to encroach on Charter Streets thus may constitute an impermissible sub-delegation of power and render the exercise of power unlawful. The City's public Scheme of Delegation appears to indicate that powers to dispose of property and grant licences, easements etc. rests with the City Surveyor and Executive Director Property, rather than a planning officer.

5. Loss of retail floorspace

5.1 Our Client's previous objections have noted that the Subject Land is located within a Principal Shopping Centre (Cheapside). Local Plan policy DM 20.1 resists the loss of retail frontage and floorspace adding that additional retail provision is encouraged. Similarly, Draft City Plan policy RE1 states that loss of ground floor retail frontages and/or floorspace will be resisted.

5.2 The Proposed Development would result in a reduction of commercial floorspace of 523 sqm – including a reduction of 150 sqm of retail floorspace on ground floor level. This reduction in retail frontage and floorspace is contrary to Local Plan policy DM 20.1 and Draft City Plan RE1 and the Application should be refused.

5.3 The Applicant has noted in its revised Application that the existing retail units on the Subject Land are vacant, with the majority of the reduction of retail floorspace attributed to the reconfiguration of floorspace at basement level. However, this assessment is flawed for a number of reasons:

5.3.1 The Applicant's agent acknowledges that retail vacancy rates in Central London are falling as of the end of Q4 2024, with supply tightly restricted.[2]

5.3.2 The Applicant has effective control over the retail vacancy of the Subject Land. It is not clear whether the vacant retail space is being actively advertised at market rates, or whether the Applicant has allowed the space to become vacant in anticipation of the Proposed Development. The Applicant cannot allow a retail space to become vacant to then justify the removal of a retail space.

5.3.3 The policies noted above provide that loss of ground floor retail floorspace should be resisted. We agree with this policy and submit that it should be applied in assessing the Proposed Development.

5.4 The Applicant has not demonstrated how the Proposed Development complies with this policy, other than noting it wishes to reconfigure the floorspace of the Subject Land. The Applicant may well wish to do so, but that does not mean that the Proposed Development is in compliance with the City's planning policy. Further, the City's planning officers must apply the City's own policy unless material considerations indicate otherwise. As the Court of Appeal has noted in *DLA Delivery Ltd v Baroness Cumberlege of Newick & Anor (Rev 1)* [2018] EWCA Civ 1305 at [28]:

> *"It is well established, as a general principle, that policies issued to guide the exercise of administrative discretion are an essential means of securing consistency in decision-making, and that such policies should be consistently applied…And that principle certainly applies in the sphere of land use planning, where, under the statutory code, decisions on applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004)."*

6. Inappropriate design

6.1 Please see the **enclosed** report from MVHC on the impact of the Proposed Development on the surrounding area. We have previously submitted that the Proposed Development should

[2] *Savills UK | Market in Minutes: Central London Retail – Q4 2024.*

be refused because it is not of a high standard of design and harms the townscape and public realm contrary to Local Plan policy DM 10.1 on the basis that:

6.1.1 The bulk and massing are not appropriate in relation to the surroundings. The Proposed Development does not have due regard to the general scale, height, building lines, character and historic interest, urban grain and materials of the locality.

6.1.2 The Application does not demonstrate that there will not be unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding buildings and public realm.

6.1.3 The design of the roof is not visually integrated into the overall design of the Subject Land when seen from street level or higher-level viewpoints. The plant enclosure and pavilion in particular are visually jarring and unintegrated.

6.1.4 Plant and building services equipment are not integrated into the design of the Subject Land. The plant room and pavilion adversely affect the character, appearance and amenities of the buildings and the area.

6.2 The revised Application has not addressed these concerns with its minor internal changes to landscaping, benches and screening. The roofscape of the Proposed Development remains incongruous with the surrounding rooflines, is overly dominant and out of character to the existing area. The view of the Proposed Development and the roofscape from surrounding buildings such as the Ned Hotel cannot be said to complement the surrounding buildings. The Proposed Development harms the setting of the Grade I listed Ned Hotel, Grade II* listed 1 Poultry, the Bank Conservation Area and the adjacent Guildhall Conservation Area contrary to sections 66 and 72 of the Planning (Conservation Areas and Listed Buildings) Act 1990.

7. Unacceptable impact on the Ned Hotel's business

7.1 We have previously submitted that the Proposed Development is unacceptably dominant and would result in a significant overlooking of the roof terrace of the Ned Hotel and a distinct reduction in the privacy currently enjoyed by the open space amenity area. Please see the

visualisation of the impact of the Proposed Development on the Ned Hotel's rooftop amenity area (specifically the pool area) below:

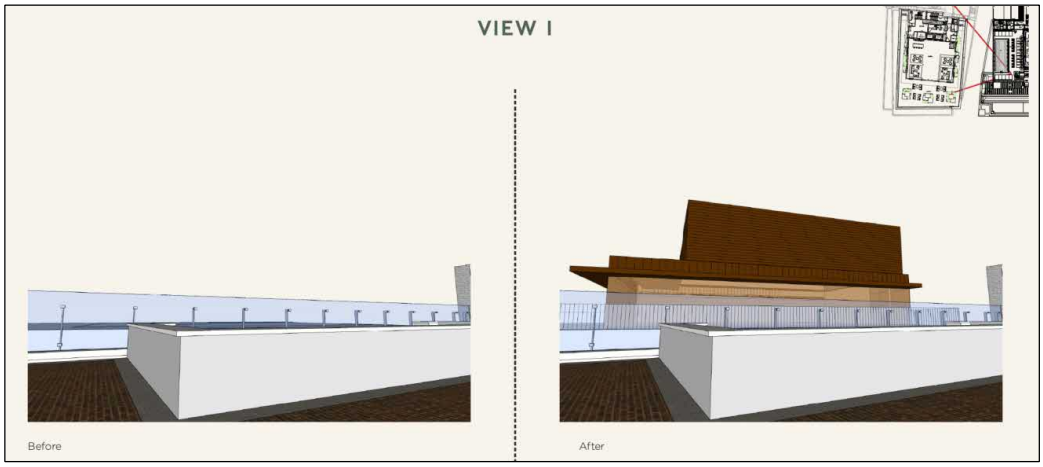


Figure 1

7.2 The revised Application has not addressed our Client's concerns in this respect. The revised Application proposes minor changes such as relocation of benches, landscaping and planted screenings. However, the bulk of the Proposed Development remains the same. The proposed roof terrace will continue to overlook the Ned Hotel and will remain a bulky and obtrusive addition to the rooftop of the Subject Land.

7.3 The Proposed Development has a disproportionately negative impact on the Ned Hotel and surrounding area and the Application should therefore be refused.

8. Harm to heritage assets

8.1 The Applicant submits in its revised Application that the Proposed Development does not significantly impact heritage assets such as the Bank Conservation Area and neighbouring listed buildings.

8.2 We note briefly that the Applicant makes reference to Policy DM 11.3 of the Local Plan which supports new hotel accommodation, only where this would not prejudice the primary business function of the City. This Policy has no application to the Proposed Development, which does not relate to new hotel accommodation. Our Client's property, the Ned Hotel, is

not the subject of the Proposed Development. The Ned Hotel is the existing business that is being impacted by the Proposed Development.

8.3 Our Clients have otherwise engaged Miriam Volic of MVHC, an experienced heritage consultant, to review the impact of the Proposed Development on the surrounding heritage assets and objects to the Application. MVHC has reviewed the revised Application, with its report **enclosed**. In summary, MVHC conclude that:

8.3.1 The Applicant's Montagu Evans Heritage and Townscape Assessment (**HTA**) underestimates the level of harm the Proposed Development causes. The previous examples cited in the HTA do not concern roof additions in the immediate vicinity of heritage assets that are as visually prominent as the one proposed.

8.3.2 The HTA dismisses the relevance of the Ned Hotel's roof terrace based on the premise that it is not part of the historic fabric. This is fundamentally wrong. The rooftop improvements enhance the overall special interest of this heritage asset and contribute to the Ned Hotel building's overall significance.

8.3.3 The core of the Proposed Development has remained identical to the previous Application, with retained bulk, size, materiality and position of the roof extension. The appearance of the proposed roof extension remains dominant and unsympathetic, failing to appreciate the setting of the adjacent listed building and the significance of its amenity area. It remains visually obtrusive and will result in complete loss of the outlook towards the St Pauls Cathedral and Church of St Mary le Bow, enjoyed by thousands of guests and visitors to the Ned Hotel.

8.4 Further, we note that 1 Poultry is similarly a Grade II* listed building, described as a modernist masterpiece, "the great building of late-twentieth-century London." Historic England's listing describes 1 Poultry as one of the major British urban landmarks of the later 20th century, the building, and debate, illustrating core values of post-modern urbanism, notably that of contextualism, in acknowledging the adjacent buildings in scale and material, and in showing that contrast is essential for meaning to be communicated. The effect of the development on this building is enormous, in inserting a bulky, generic rooftop terrace, ruining the contrasting modernist effect that 1 Poultry has with the surrounding heritage buildings in the surrounding conservation areas.

8.5 We agree with the conclusion of MVHC's review that the Application should be refused.

9. Unacceptable impact on daylight and sunlight

9.1 Our Client's objection dated 23 January 2025 noted that the Application should be refused on the basis that it failed to correctly assess daylight and sunlight impacts, with reference to policies in the Local Plan (DM10.7) and the Draft City Plan (DE7). Those objections remain valid in light of this revised Application.

9.2 The Applicant has since responded noting that the Proposed Development would not impact on overshadowing of the private external terraces of the Ned Hotel and have only minor impacts on the level of daylight and sunlight available to hotel rooms within the Ned Hotel. We disagree with this assessment.

9.3 Our Client has engaged GIA Surveyors to comment on the Proposed Development. GIA's report is **enclosed**. We summarise the findings here:

9.3.1 The BRE Guidelines (an industry standard on daylight and sunlight impacts) do apply to hotels. The Applicant has noted that *"the BRE Guidelines simply do not apply to hotel development, and as such the criticisms of the technical work are wholly misguided."* This position is factually incorrect. GIA note that paragraph 2.2.2 of the BRE Guidelines state that *"The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, **hotels** and hostels, small workshops, and some offices."* This language is not ambiguous. Hotels are within the scope of the BRE Guidelines. Any further analysis by the Applicant on daylight and sunlight impacts must be disregarded until the Applicant acknowledges that the BRE Guidelines apply to the Ned Hotel, and the Proposed Development's effects on the Ned Hotel.

9.3.2 GIA further notes that a holistic consideration of daylight and sunlight impacts is appropriate. Given the Applicant repeatedly notes that the Proposed Development will trigger a "small" or "minor" impact, then there is room to narrow the issues in dispute between the Applicant and our Client. That is, if we agree that the BRE Guidelines apply (which is not ambiguous) and that there is some impact on daylight and sunlight for the Ned Hotel because of the Proposed Development,

then the issues in dispute between the parties are only the level of the impact. The Applicant notes there is a small or minor impact. Our Client clearly takes a different approach. Given our Client has a greater understanding of its own business, our Client's view should be given greater weight in assessing potential impacts. Reviews of the Ned Hotel specifically refer to *"the best views of the city".*[3] Patrons of the Ned Hotel thus have a reasonable expectation of daylight. Any impact to views and light because of new development would have a major effect upon the business of the Ned Hotel and its guests.

9.4 We submit that the Applicant must reassess the daylight and sunlight impacts of the Proposed Development with the acknowledgement that the BRE Guidelines do apply to hotels, and that a holistic consideration of impacts is appropriate. Any expert technical assessments of impacts can then be appropriately peer-reviewed by the City and any other objectors to the Proposed Development, including our Client.

10. Lack of adequate community engagement

10.1 We have previously submitted that the Application does not that demonstrate that the Applicant attempted to obtain any views from the local community or local stakeholders. The Applicant has since noted that they have "also sought to respond where necessary to matters that have been raised following the latest round of public consultation", while also noting that the changes in the revised Application are minor changes that are not considered necessary to make the Proposed Development acceptable.

10.2 We refute this position. We have raised legitimate concerns about the Proposed Development and no genuine compromises have been offered. The Applicant notes itself that the changes made are minor and so do not go to heart of the concerns we have raised regarding loss of retail space, inappropriate design, bulky development impeding views and the detrimental impact on heritage assets.

10.3 The Application does not include a statement of community involvement, despite this being requested by the City at pre-application stage and contrary to the Developer Engagement Guidance. The Applicant has not demonstrated that they have had any regard to the City's Developer Engagement Guidance or the City's Statement of Community Involvement. The

[3] *The Ned Hotel & Club Embodies the Sparkling Spirit of London*, CSP Times, August 7, 2021.

lack of engagement and consultation was one of the grounds provided in the claim for judicial review in respect of the Application.

10.4 In past meetings with our Client, it was made clear to our Client that the Applicant would not make changes to the Proposed Development despite our Client's best efforts to work with the Applicant to find amendments to the scheme to mitigate the Proposed Development's numerous negative impacts on the Grade I listed Ned Hotel, Grade II* listed 1 Poultry and surrounding Conservation Areas.

10.5 We do not consider that the Applicant intended to make any amendments to the Proposed Development, despite attending meetings with our Client, as is evidenced by the lack of any amendments to the Application following re-submission. We refute the Applicant's recent statement that it has sought to work constructively with the Subject Land's neighbours.

11. Conclusion

11.1 For the reasons set out in this letter the Application should be refused.

11.2 The lack of any good faith engagement by the Applicant with the public and key stakeholders is concerning. We urge the City to determine the Application by planning committee so that the Application is thoroughly debated and discussed.

11.3 Kindly acknowledge receipt of this letter of objection in writing.

Yours sincerely

Jesse Cowie
Associate (Australian Qualified)

Encs Appendix 1 - GIA Report dated 13 May 2025
Appendix 2 - Addendum to Objection to Planning Application - MVHC Ltd - May 2025
Appendix 3 - Letter to City of London dated 23 January 2025

DATE / REF
13/05/2025
19556/BW

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RE: GIA response to the revised planning application at 1 Old Jewry (24/00226/FULL) and associated Savills Cover Letter (dated 13 March 2025).

Overview

This note has been prepared by GIA to address the Savills Cover Letter (dated 13 March 2025) with reference to the objection made by The Ned and the subsequent revised planning application (ref:24/00226/FULL). It provides comments regarding the submitted daylight and sunlight assessment, as prepared by Point 2 Surveyors:

Summary of GIA's Findings

1. **Additional VSC Impact Identified**

In addition to the two bedrooms previously identified as impacted, GIA notes a further Vertical Sky Component (VSC) reduction, beyond the BRE guideline target, of 27.8% to a sixth-floor bedroom window.

2. **No-Sky Line (NSL) Impacts**

Two of the four affected rooms will also experience NSL reductions of 39% and 42%.

Response to Applicant's Position

The applicant asserts that the Building Research Establishment (BRE) Guidelines are not applicable to hotel developments, and therefore the points raised by GIA are unwarranted. GIA outlines that as stated in paragraph 2.2.2 of the BRE Guidelines:

"The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices."

This confirms that the BRE Guidelines can be relevant to hotel uses. Whilst GIA acknowledges that hotel rooms are typically used on a transient basis, this does not negate the applicability of daylight and sunlight assessments.

GIA Responses to Points of clarification provided by Point 2

- **Technical Assessmnet**

  Point 2's assessment relied on data from Listed Building Consents relating to The Ned. GIA do not dispute the appropriateness of the data source. GIA's intention was simply to highlight the omission of a relevant window from the analysis.

- **Nature of Habitable Rooms**

  GIA accepts the distinction between permanent residential habitable rooms and hotel rooms and confirms this was factored into their review.

- **Use of BRE Appendix H**

  GIA acknowledges that Appendix H pertains to Environmental Impact Assessments (EIAs) and is not directly applicable in this context. However, it is standard industry practice to apply banding terms (such as "minor",

"moderate", or "major adverse") for describing impact severity, even outside of EIAs. Similar language was also used in the Point 2 report.

- **Overall Impact Assessment**

Point 2 concludes that no rooms would experience impacts greater than "minor" in significance. GIA's observations regarding the "borderline" nature of certain reductions are not intended to contest the overall conclusion but to ensure accurate and complete reporting.

- **Assessment of NSL in transient Bedrooms**

GIA acknowledges the BRE position that bedrooms have lower daylight expectations and does not dispute Point 2's conclusion.

- **Emerging Local Plan Policies**

This point of objection was not made directly by GIA. It is accepted that limited weight can be afforded to emerging policies at this early stage of preparation. However, GIA do consider it an appropriate and relevant consideration.

Conclusion

GIA's comments are not intended to undermine the technical integrity of the Point 2 assessment but to highlight areas where interpretation, completeness, or emphasis may differ. GIA acknowledges that the overall daylight and sunlight impact, when assessed holistically and with due regard to the transitory nature of hotel rooms, but believe it is valid to represent alternative interpretations of the guidance.

DISCLAIMER:

N.B This report has been prepared for by GIA as their appointed Daylight & Sunlight consultants. This report is intended solely for and may contain confidential information. No part or whole of its contents may be disclosed to or relied upon by any Third Parties without the express written consent of GIA. It is accurate as at the time of publication and based upon the information we have been provided with as set out in the report. It does not take into account changes that have taken place since the report was written nor does it take into account private information on internal layouts and room uses of adjoining properties unless this information is publicly available.

1 OLD JEWRY, LONDON EC2R 8DN

ADDENDUM TO OBJECTION TO PLANNING APPLICATION
Reference No. 24/00226/FULL

MAY 2025

@MVHC LTD
32 MURRAY ROAD
RICHMOND TW10 7QG
T: + 44 77 806 866 31

12.05.2025

Anastasia Tampouridou
Development Division
Department of the Built Environment
City of London
P.O. Box 270
Guildhall
London
EC2P 2EJ

Dear Ms Tampouridou,

Re: 1 OLD JEWRY, LONDON, EC2R 8DN, APPLICATION REFERENCE: 24/00226/FULL

1.1 We write on behalf of our clients Vivas Invest & Finance Limited (the owner) and Poultry Tenant Limited (the tenant) of the Grade I Listed former Midland Bank headquarters building converted into five-star Ned Hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel).

1.2 MVHC Ltd has been appointed to review the documents submitted with current application 24/00226/FULL for the proposed works: " The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace "

1.3 In January 2025, MVHC LTD prepared a report that reviewed the documentation submitted with current application for planning permission (Ref. 24/00226/FULL). The report included a summary of the significance of the identified heritage assets, specifically focusing on the relevant listed buildings as well as the Bank and Guildhall Conservation Areas. Additionally, the report assessed the potential impact of the proposed development on The Ned Building and other relevant heritage assets.

1.4 In response to several objections regarding the proposed scheme, the applicant has made amendments to address the concerns raised. The changes include minor modifications to the initial proposal, which are as follows:

The relocation of the external door from the east to the west elevation of the pavilion extension to limit access to the eastern side of the roof terrace.
Removal of the benching on the eastern section of the terrace.
Re-orientation of the south-eastern landscaping plinth to face away from The Ned; and
Introduction of planted screening to the east of the Pavilion extension to obscure views towards The Ned

1.5 This document is prepared in response to minor amendments to the proposed development and as a further objection to the submitted scheme and should be read in conjunction with our previous objection report, issued in January 2025.

Impact on Heritage Assets

1.6 Below is detailed response to the AACL - Applicant Agent's Cover Letter (Ref. 13 March 2025 L250313 SAV Cover Letter - Heritage assets and the impact of the proposed scheme):

- *"*The application includes a comprehensive assessment of the proposed development and its impact on the significance of all relevant heritage assets (see the Heritage and Townscape Assessment (*'*HTA*'*), prepared by Montagu Evans and dated February 2024). Section 4 of the HTA formally assessed the potential impact of the proposed development on the relevant heritage assets both within and beyond the Site. The assessment includes impacts on the Bank Conservation Area and nine statutorily listed buildings identified within the vicinity of the Site.
- In respect of the statutorily listed buildings, the HTA includes an assessment of the contribution of the setting to their significance and the impact of the proposed development in that context.*"*
- Section 5 of the HTA provides a wider assessment of townscape matters which was informed by a series of views agreed with the CoL as part of the pre-application stage.*"*

1.6 Response: The HTA underestimates the level of harm the proposed development causes upon Grade I listed building, its setting and its significance. The townscape analysis provided by HTA states that there is a variety of rooftops in the vicinity of the application site. However, there are no roof additions in the immediate vicinity of affected heritage assets (Grade I Listed the Ned building, Grade II* listed The Poultry) that are as visually prominent as the one proposed. In fact, most surrounding buildings feature rooftops that are of similar heights or lower, thereby respecting the setting of these heritage assets.

1.7 The Applicant Agent's Cover Letter continues: *"*It follows the HTA continues to demonstrate that the significance of the relevant heritage assets would be preserved and that there would be no adverse townscape impacts given the limited intervisibility of the rooftop extension from the Conservation Area.*"*

1.8 Response: The Heritage Impact Assessment (HTA) fails to demonstrate how the significance of the relevant heritage asset will be preserved. Its appraisal of the significance of the Ned building is flawed because it dismisses the relevance of the roof terrace based on the premise that it is not part of the historic fabric. This is fundamentally wrong. The rooftop improvements enhance the overall special interest of this heritage asset and contribute to Ned's building's overall significance. While the proposed rooftop extension to No 1 Old Jewry may be only minimally visible from the Conservation Area, it will nonetheless have a substantially adverse impact on the neighbouring listed building and its overall significance.

1.9 Agent's Letter continues: *"*The HTA also concludes that the development would introduce a number of architectural improvements to the building, including enhanced ground floor activation, which creates a better interface with Bank Conservation Area, and removal of incongruent back-painted glass spandrels on the elevations.*"*

1.10 Response: The proposed improvements to the existing application building do not alleviate the level of harm the proposed rooftop extension will cause to the neighbouring listed building.

1.11 The Agent's Letter continues: *"*The CoL has concluded on comparable schemes for small to mid-scale rooftop extensions adjacent to listed buildings within the Bank Conservation Area (including but not limited to development at 25 Moorgate, 14-18 Copthall Avenue and 68 King William Street) that there would be no unacceptable impact on the significance of heritage assets.*"*

1.12 Response: The above-mentioned developments differ from 1 Old Jewry planning application and are not comparable. Below is brief commentary on each example:

Smith & Williamson 25 Moorgate (Ref. 22/00832/FULL)

Officer's Report states: "The building is not statutorily or locally listed and there are no listed buildings or scheduled monuments directly adjacent to the site [...]". No 1 Old Jewry is adjacent to the Ned, Grade I listed building.

14 - 18 Copthall Avenue London (Ref. 20/00400/FULL)

The roof alterations involve replacement of the existing incongruous roof extensions. The proposed roof alterations/extensions have been described in the Officer's Report as follows:

"The main alteration is at roof level. The proposal would restore the architectural integrity and character of the flamboyant original roof, enhancing it. The current modern extrusions and unattractive plant enclosure at roof level undermine the original roofscape, now appreciated against the backdrop of much taller built form, rather than clear sky. It creates a complicated, fussy backdrop undermining the clarity of the historic roof. The main eaves of the proposal are not much higher than the current highest point, and the extension would deliver a well composed, well-scaled and elegantly detailed new extension of high-quality contextual materials. In distinct contrast it would calm the backdrop to the restored historic roof in local townscape views, including those identified in the SPD, resulting in a subservient extension, better complementing the historic roof [...]"

1.13 The current proposals at No.1 Old Jewry can not be comparable with the above development scheme. The scheme at No 1 Old Jewry, does not propose to restore the architectural integrity and character of the existing building. The height of the proposed roof extension will be significantly higher than the existing building. The proposals do not deliver well composed, well-scaled and elegantly detailed new extension. The new extension will not be subservient to the nearby historic buildings, or their rooftops. Additionally, the urban and heritage context of the above discussed development differs to the context in which 1 Old Jewry building lies and is not comparable.

68 King William Street (Ref. 19/01308/FULL)

1.14 The above site has undergone substantial changes over the years. Between 2001 and 2003, the upper five floors and cupola were demolished and rebuilt. The nature of the roof alterations to this building are of entirely different character, than in case of No. 1 Old Jewry. Whilst Old Jewry has no roof extensions at present, 68 King William Street building had already mansard roof extensions built in 1969, prior to the 2003 works. Furthermore, the additional roof extensions related to 2019 application have been assessed through appraisal of nine of the views are from ground level and additional views 10 and 11 from the uppermost levels of 22 Bishopsgate and 20 Fenchurch Street respectively, based on produced AVR visualisations.

1.15 Also, the supporting documentation for No 1 Old Jewry development does not provide assessment of elevated views of the application site which would demonstrate the harmful impact on the neighbouring grade I listed Ned building.

1.16 The Agent's letter further states: "It is also noteworthy that the introduction of new, rooftop amenity formed part of the original planning application for the conversion of the Midland Bank to The Ned in June 20146. In assessing and determining the application, the CoL concluded that the majority of works at roof level would not be visible from street level nearby and as such there would be no harmful impact on the character and appearance of the Bank Conservation Area."

1.17 Response: The Ned is a Grade I listed building, designed by Sir Edwin Lutyens, who is widely recognized as England's greatest architect since Sir Christopher Wren. Originally conceived in 1924 and completed in 1939 as the headquarters for Midland Bank, it is now celebrated as an architectural gem and an exemplary representation of early 20th-century architecture in London. The redevelopment of this former bank into a five-star hotel implemented a conservation-oriented approach, prioritising the restoration, enhancement and, above all, the preservation of its heritage values. This project received the RIBA London Award in 2019, recognising its

exceptional design and execution. The successful transformation of the bank into a modern hospitality establishment has ensured that this important piece of architectural history is saved for the posterity.

1.18 The restoration and refurbishment of Ned have successfully preserved the views from street level and maintained the integrity of its neighbouring listed buildings. In stark contrast, the proposal for No. 1 Old Jewry includes a bulky and unsympathetic addition that manifestly disregards its detrimental impact on the existing amenity of the Ned building.

1.19 The Agent's Letter continues: *"*The existence of a private roof terrace at The Ned should not inhibit the ability of neighbouring buildings to pursue appropriate enhancements focused on the introduction of external amenity. *"*

1.20 Response: The proposed development involves creation of two-storey roof extension with external amenity area. Therefore, it is misleading to say that the proposed alterations to the roof are focused on the " introduction of external amenity.*"* The objection to this proposal is based on the several issues and concerns:

- The proposed height and bulk
- The proposed scale and materiality
- Loss of privacy
- Loss of outlook to and from St Paul's Cathedral, and Church of St Mary Le Bow.

1.21 The Agent's Letter continues: *"*This is the very purpose of Policy DM 11.3 of the City Local Plan 2015 which only provides support for new hotel accommodation where this would not prejudice the primary business function of the City. *"*

1.22 Response: It is unclear how Policy DM 11.3 of the City Local Plan (2015) is relevant to assessing whether the proposed development at No. 1 Old Jewry will negatively impact the existing Grade I listed building and its significance. The raised objection focuses specifically on the roof alterations and does not call for the rejection of the primary business functions of the City. The aim is to protect the heritage asset, which is of national importance and significantly contributes to the City's identity as both a heritage site and a thriving business location. For clarity, it is noted that DM.11.3 (Hotels) full policy includes support for the hotel development where they would:

- *"*contribute to the balance and mix of uses in the immediate locality.
- do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts.
- ensure continuing beneficial use for historic buildings, where appropriate.*"*

1.23 The Ned Hotel adheres to all of DM 11.3 Policy tenets.

1.24 The Agent's Letter continues: Provided that the relationship between the two external amenity spaces is acceptable, there is no reason to withhold permission for the proposed development.

1.25 Response: The issue is not solely creation of the external amenity, but the two-storey roof extension, which occupies two-thirds of the existing roof area of the applicant's building. It is the impact of the roof addition which causes most of the detrimental impact on the neighbouring building.

1.26 The Agent's Letter states: *"*It is evident from the documents that comprise the application that the proposed development is an appropriate and successful response to the context of the Site.

1.27 Response: No such evidence is provided. The proposed roof extension is inappropriate and lacking sensitivity in terms of its size, bulk, materials, and location. This proposal does not adequately consider the context of the site, particularly in relation to the nearby grade I listed building, its setting, and its historical significance.

REVIEW OF THE AMENDED PROPOSALS

1.28 In response to several objections the applicants have revised the proposals, to address the privacy concerns. The revised scheme has introduced following changes to the proposed scheme:

- The relocation of the external door from the east to the west elevation of the pavilion extension to limit access to the eastern side of the roof terrace.
- Removal of the benching on the eastern section of the terrace.
- Re-orientation of the south-eastern landscaping plinth to face away from The Ned; and
- Introduction of planted screening to the east of the Pavilion extension to obscure views towards The Ned

1.29 Whilst the issue of overlooking and privacy may have been addressed by the above changes, the core of the proposed scheme has remained identical to the previous one, with retained bulk, size, materiality and position of the roof extension.

1.30 The appearance of the proposed roof extension remains dominant and unsympathetic, failing to appreciate the setting of the adjacent listed building and the significance of its amenity area. It remains visually obtrusive and will result in complete loss of the outlook towards the St Pauls Cathedral and Church of St Mary le Bow, enjoyed by thousands of guests and visitors to the Ned Hotel.

1.31 For the above reasons we further object to the proposals for 1 Old Jewry as they would cause harm to the significance of identified heritage assets. We believe that the “public benefit” required to mitigate such harm has not been demonstrated sufficiently. The proposals do not fully comply with the requirements of national or local heritage planning policies and should not be approved.

[redacted]

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FARRER&Co

Ms Anastasia Tampouridou
Case Officer
Development Division
Department of the Built Environment
City of London
P.O. Box 270
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London EC2P 2EJ

Your Ref:24/00226/FULL
Our Ref: 107110.1
Tel:
Fax:
Email:
[redacted]

23 January 2025

By Email:
[redacted]

Dear Ms Tampouridou

Objection to planning application with reference 24/00226/FULL
1 Old Jewry, London EC2R 8DN

1. Introduction

1.1 We act on behalf of Vivas Invest & Finance Limited (**Our Client),** the owner of the Grade I listed former Midland Bank headquarters building which is used as the five star Ned hotel at 27 Poultry, London, EC2R 8AJ (**the Ned Hotel**). The Ned Hotel is immediately to the east of 1 Old Jewry, London EC2R 8DR (the **Property**). The Ned Hotel provides, amongst other things, hotel guest accommodation and a private members club (**Ned's Club**). Members of the Ned's Club have access to a range of private facilities including a rooftop pool and terraces.

1.2 We write in respect of the application for full planning permission with reference 24/00226/FULL (the **Application**) made in respect of the Property to the City of London (the **City**) on behalf of Deka Immobilien Investment GmbH (the **Applicant**) on 01 March 2024 for:

"*The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace*" (the **Proposed Development**).

1.3 The City granted the Application planning permission on 15 July 2024. However, the City's decision was quashed on 04 December 2024 following a claim for judicial review brought jointly by Our Client and the tenant of the Ned Hotel.

Farrer & Co LLP is a limited liability partnership registered in England and Wales, registered number OC323570, and is authorised and regulated by the Solicitors Regulation Authority (ID 447822). A list of the members of the LLP is displayed at the above address, together with a list of those non-members who are designated as partners.

1.4 The Applicant's agent submitted updated information in respect of the Application the next day, on 05 December 2024. The Application will be reconsulted on and redetermined by the City. The Proposed Development has not been altered by the Applicant and remains the same as the original submission.

1.5 We request that the Council refuse the Application for the reasons detailed in this letter, which include:

1.5.1 the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements;

1.5.2 the extent of the Proposed Development (including the increase in floorspace) is inconsistent across the Application documents and does not clearly identify the scope of the proposed works;

1.5.3 the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application;

1.5.4 the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

1.5.5 the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts;

1.5.6 the Proposed Development harms surrounding heritage assets;

1.5.7 the Application fails to correctly assess the daylight and sunlight impacts; and

1.5.8 lack of adequate community engagement on the Proposed Development.

2. The City's Development Plan

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. As at the date of this letter, the Council's development plan includes the following documents relevant to the Proposed Development:

2.1.1 City of London Local Plan adopted January 2015 (**Local Plan**);

2.1.2 City Plan 2040 Revised Proposed Submission Draft dated April 2024 (**Draft City Plan**);

2.1.3 The London Plan adopted March 2021 (**London Plan**);

2.1.4 the City's Developer Engagement Guidance dated May 2023 (**Developer Engagement Guidance**); and

2.1.5 the City's Statement of Community Involvement dated July 2024 (**SCI**).

3. Deficiencies in the Site Location Plan

3.1 The Town and Country Planning (Development Management Procedure) (England) Order 2015 (**DMPO 2015**) at article 7(1)(c)(i) requires planning applications to be accompanied by a plan identifying the relevant land subject to the Application. Government guidance states that the location plan "*should include all land necessary to carry out the proposed development (eg land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings).*"

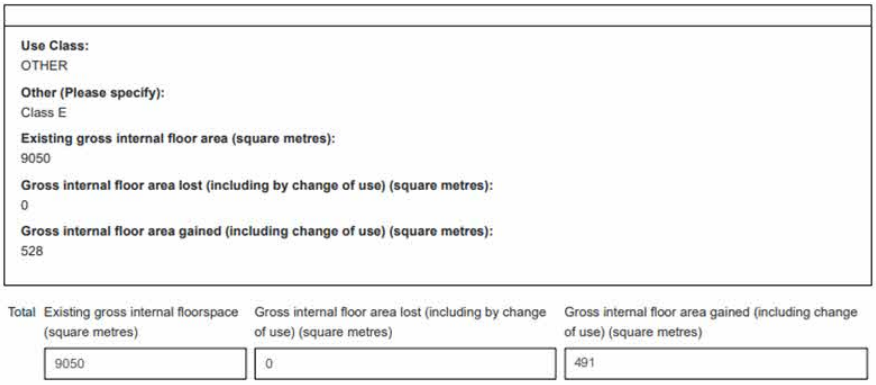
3.2 The site location plan drawing number 6982-SRA-XX-XX-DR-A-02100 Rev P01 dated 19 February 2024 (the **Site Location Plan**) does not meet the validation criteria as the red line does not include all land necessary to carry out the Proposed Development as the red line does not include:

3.2.1 land needed for construction vehicles and works to take place;

3.2.2 space for storage of construction materials, construction vehicles or welfare offices.

4. Unclear extent of the Proposed Development

4.1 The application form submitted with the Application dated 20 February 2024 (**Application Form**) is internally inconsistent as it provides two different figures for the gross internal floor area (**GIA**) gained (including change of use) as both 528 and 491 square metres (see extract below):



Use Class:
OTHER

Other (Please specify):
Class E

Existing gross internal floor area (square metres):
9050

Gross internal floor area lost (including by change of use) (square metres):
0

Gross internal floor area gained (including change of use) (square metres):
528

Total	Existing gross internal floorspace (square metres)	Gross internal floor area lost (including by change of use) (square metres)	Gross internal floor area gained (including change of use) (square metres)
	9050	0	491

4.2 The Community Infrastructure Levy (**CIL**) form 1 dated 20 February 2024 (**CIL Form**) states that the net additional gross internal area following the development is 491 square metres. It is unclear whether any change of use on the ground floor and basement floors or pavilion is included in the Application Form and CIL Form's calculations for the proposed gross internal areas. We note that both documents state that the gross internal area to be lost by change of use or demolition is 0.

4.3 We note that the planning statement dated February 2024 submitted with the Application (**Planning Statement**) states at paragraph 3.7 that the proposed **pavilion structure will provide an additional 385 sqm of GIA floorspace**. The Planning Statement also states at paragraph 3.26 that the "*Proposed Development will result in an increase in 530 sq. m of*

‘office’ floorspace across Ground and Basement levels. There will be a corresponding reduction in ‘commercial floorspace of 523 sq.m.”

4.4 Paragraph 3.17 of the Planning Statement states that the Property’s “*proposed primary office floorspace will measure 6,449 sq. m (NIA); a net increase of 616 sq. m (excluding those areas used for storage, stairwells, bathrooms and mechanical rooms)*.”

4.5 The Application Form, CIL Form and Planning Statement do not appear to correctly reflect the floorspace gained by the Proposed Development or detail the floorspace reductions via change of use. If the pavilion structure would result in an **increase of 385 sqm GIA and there is an increase in primary office floorspace of 616 sqm** NIA then the increase in floorspace as a result of the Proposed Development is **likely to be far more than 491 sqm or 528 sqm GIA** as is provided in the Application Form and the CIL Form. Indeed, the Proposed Development may actually result in the creation of more than 1,000 square metres of floorspace **which would mean that the Application falls under the article 2 DMPO 2015 definition of “major development”.**

4.6 The description of development is similarly unclear as to the extent of the works applied for – especially in relation to the works on the ground floor and basement. For example, it is unclear whether the Application includes a change of use for the ground floor commercial units which are otherwise restricted by condition 5 of planning permission 05/00182/FULL to retail (A1) use only.

4.7 Given the lack of detail as to the works included in the Proposed Development in addition to the discrepancies between the Application documents, it is difficult for anyone to appropriately assess the impact of the Proposed Development. We urge the Application to be refused.

5. Loss of retail floorspace

5.1 The Property is located within a Principal Shopping Centre (Cheapside). Local Plan policy DM 20.1 resists the loss of retail frontage and floorspace adding that additional retail provision is encouraged. Similarly, Draft City Plan policy RE1 states that loss of ground floor retail frontages and/or floorspace will be resisted.

5.2 Paragraphs 3.26 of the Planning Statement state that the Proposed Development would result in a reduction of commercial floorspace of 523 sqm – including a reduction of 150 sqm of retail floorspace on ground floor level. This reduction in retail frontage and floorspace is contrary to Local Plan policy DM 20.1 and Draft City Plan RE1 and the Application should be refused.

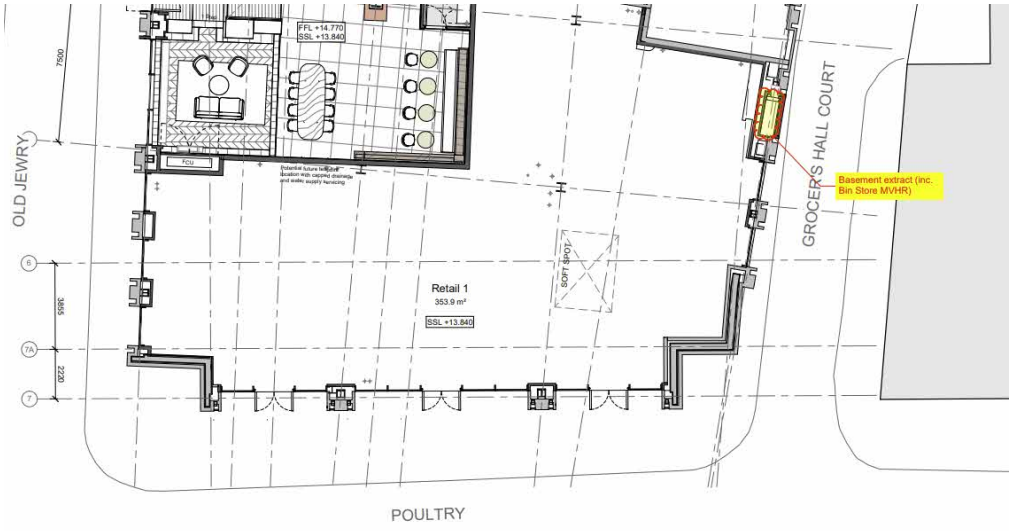
5.3 The Application does not appear to comply with the City’s pre-application advice of 28 April 2023 (**Pre-App Response 1**) which states that:

“*Local policies do not support the loss of ground floor retails [sic] floorspace within Principal Shopping Centres. However, as discussed in our pre-application meeting, there may be scope to retain the existing retail frontage and number of units but make changes to the depth of Retail Unit 1 to accommodate a larger office reception. This would need to be supported by robust justification which demonstrates that a smaller retail unit would be viable in this*

PSC location" and "***As a starting point the principle of development, involving the loss of retail floorspace and frontage in the PSC is not supported***" (emphasis added).

5.4 In a second pre-application response of 18 December 2023 (**Pre-App Response 2**) the City stated that "*a viability statement should be submitted as part of any application to support the proposal in line with the Draft City [Plan] policy RE1*" noting that the "*Draft City Plan highlights Old Jewry as a key retail link.*"

5.5 The proposed ground floor arrangement plan with drawing number 6982-SRA-XX-00-DR-A-20100 Rev. P06 shows only one retail unit on the ground floor "Retail 1" indicating the loss of two retail units (see extract below). It is also noted that the entrance doors to retail units open out onto public highway contrary to the City's Pre-App Response 1 as also shown in the extract below:



5.6 The Application does not provide a robust justification for the loss of two retail units at ground floor or evidence that one larger retail unit would be more viable than three smaller units. This is contrary to the Pre-App Response 1, Pre-App Response 2, Local Plan policy DM 20.1 and Draft City Plan policy RE1.

6. Inappropriate design

6.1 The Proposed Development should be refused because it is not of a high standard of design and harms the townscape and public realm contrary to Local Plan policy DM 10.1 on the basis that:

6.1.1 The bulk and massing are not appropriate in relation to the surroundings. The Proposed Development does not have due regard to the general scale, height, building lines, character and historic interest, urban grain and materials of the locality.

6.1.2 The Application does not demonstrate that there will not be unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding buildings and public realm.

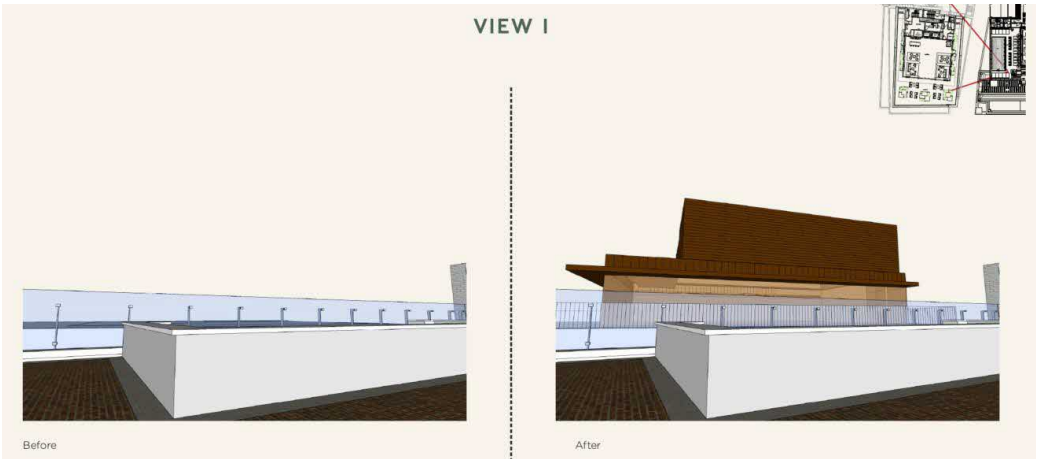
6.1.3 The design of the roof is not visually integrated into the overall design of the buildings when seen from street level or higher-level viewpoints. The plant enclosure and pavilion in particular are visually jarring and unintegrated.

6.1.4 Plant and building services equipment are not integrated into the design of the building. The plant room and pavilion adversely affect the character, appearance and amenities of the buildings and the area.

6.2 Paragraph 3.10.11 of the Local Plan states that "Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the buildings as viewed from surrounding buildings". The roofscape of the Proposed Development is incongruous with the surrounding rooflines, is overly dominant and out of character to the existing area. The view of the Proposed Development and the roofscape from surrounding buildings such as the Ned Hotel cannot be said to complement the surrounding buildings. The Proposed Development arguably harms the setting of the Grade I listed Ned Hotel, the Bank Conservation Area and the adjacent Guildhall Conservation Area.

7. Unacceptable impact on the Ned Hotel's business

7.1 The Proposed Development is unacceptably dominant and would result in a significant overlooking of the roof terrace of the Ned Hotel and a distinct reduction in the privacy currently enjoyed by the open space amenity area. Please see the visualisation of the impact of the Proposed Development on the Ned Hotel's rooftop amenity area (specifically the pool area) below:



7.2 The Ned Hotel's rooftop includes private amenity facilities, such as exclusive restaurants, bars and swimming pool for the sole use of member of the Ned's Club. The privacy and exclusiveness of the rooftop is a key reason that some members join the Ned's Club. The rooftop is currently not overlooked by any surrounding buildings.

7.3 The Proposed Development would significantly overlook the Ned Hotel's rooftop which may result in a reduction in the number of Ned's Club members due to negative impact on the rooftop's privacy. This would be of economic detriment to the Ned Hotel.

7.4 Given that the Ned Hotel's rooftop and the Property are only several metres apart, it is also possible that the Proposed Development's terrace and plant enclosure will have a significant negative impact on the Ned's Hotel in terms of noise. This is a particular concern for users of the Ned Hotel's hotel rooms, function rooms (which are used for weddings) and the rooftop area.

7.5 The Proposed Development has a disproportionately negative impact on the Ned Hotel and surrounding area and the Application should therefore be refused.

8. Harm to heritage assets

8.1 MVHC has been commissioned to review the impact of the Proposed Development on the surrounding heritage assets and objects to the Application. MVHC's review states that the Ned Hotel (being the former Midland Bank headquarters) is of exceptional architectural and historic interest, featuring outstanding architectural composition. The Ned Hotel is understandably listed as a Grade I listed building.

8.2 MVHC state that the Proposed Development's increased height, bulk, scale and materiality have a harmful effect on the neighbouring Grade I listed building (the Ned Hotel) and Grade II* listed 1 Poultry. Specifically, the height and massing of the proposed additions will appear unacceptably dominant and bulky, carrying little regard to the height of the designated heritage assets in the Property's immediate vicinity.

8.3 MVHC's objection also notes that whilst the proposed roof extension may be of limited visibility when viewed from street-level vantage points, the impact on the sensitivity of the Grade I listed Ned Hotel building , in particular its outlook towards St Pauls Cathedral and St Mary-le-Bow Church, will be substantial.

8.4 The Proposed Development significantly harms the setting and outlook of surrounding heritage assets and fails to have due regard to the requirements of The Planning (Listed Buildings and Conservation Areas) Act 1990 sections 66(1) and 72(1) and the requirements of policy DM12.1 of the London Plan. We agree with the conclusion of MVHC's review that the Application should be refused.

9. Unacceptable impact on daylight and sunlight

9.1 Policy DM10.7 of the Local Plan provides for how daylight and sunlight should be considered in determining applications. It states that (emphasis added):

> "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."

9.2 The Local Plan defines "open spaces" as "*Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.'*

9.3 Furthermore, Draft City Plan policy DE7 requires development proposals to demonstrate that the daylight and sunlight available to "*nearby dwellings and other sensitive receptors including schools, hospitals, **hotels** and hostels, places of worship and **open spaces**… is appropriate for its context and provides acceptable standards of daylight and sunlight*" (emphasis added).

9.4 The Pre-App Response of the City required the Applicant to carry out daylight and sunlight testing "*to ensure proposed new massing does not have detrimental impact on surrounding buildings*."

9.5 As of December 2024, the Application is now accompanied by a daylight and sunlight report prepared by Point 2 Surveyors Limited dated October 2024 (the **D&S Report**). However, contrary to the City's Pre-App Response which required the impact on the surrounding building**s** (plural) to be assessed, the Application only considers the impact of the Proposed Development on the Ned Hotel.

9.6 Paragraph 7.1 of the D&S Report incorrectly states that "*The Ned Hotel, does not contain residential accommodation and as a result does not have a reasonable expectation of daylight*". Draft City Plan Policy DE7 clearly identifies hotels as being sensitive receptors, which by extension, have a reasonable expectation of daylight and sunlight.

9.7 The D&S Report prepared by Point 2 Surveyors states that there are daylight reductions beyond the BRE recommendations to two bedrooms (three windows) within the Ned Hotel. Point 2 categorise each of these reductions as "minor adverse". GIA Surveyors have conducted an independent review of the daylight impact on behalf of the Ned Hotel and conclude that some of the reductions have not been accurately captured or categorised as per the nomenclature outlined in Appendix H of the BRE guidelines.

9.8 GIA concludes that, in addition to the two impacted bedrooms discussed in the Point 2 D&S Report, there will be a further "minor adverse" reduction of 27.8% to a sixth-floor bedroom window. Furthermore, two of the four impacted rooms will experience "No-Sky-Line" (NSL) reductions of 39% and 42%, both of which could be considered borderline "moderate to major adverse" reductions.

9.9 The D&S Report fails to accurately report the daylight and sunlight impact of the Proposed Development as demonstrated by the findings of GIA's independent review. The Proposed Development is contrary to Local Plan policy DM10.7 and Draft City Plan policy DE7.

10. Lack of adequate community engagement

10.1 The Application, as of December 2024, is now accompanied by a one-page engagement strategy prepared by Savills (**Engagement Strategy**) which sets out that prior to the submission of the Application, two pre-application meetings took place with the City's planning officers. The Application does not that demonstrate that the Applicant attempted to obtain any views from the local community or local stakeholders.

10.2 The Application does not include a statement of community involvement, despite this being requested by the City at pre-application stage and contrary to the Developer Engagement Guidance. The Applicant has not demonstrated that they have had any regard to the City's Developer Engagement Guidance or the City's Statement of Community Involvement. The lack of engagement and consultation was one of the grounds provided in the claim for judicial review in respect of the Application.

10.3 The Engagement Statement sets out the dates of three "dedicated meetings" between the Applicant / the Applicant's agent and our Client during which it is claimed that the Applicant sought to work positively and proactively with our Client. However, it was made clear to our Client that the Applicant would not make changes to the Proposed Development despite our Client's best efforts to work with the Applicant to find amendments to the scheme to mitigate the Proposed Development's numerous negative impacts on the Grade I listed Ned Hotel and surrounding Conservation Areas.

10.4 The consent order formally quashing the previous decision was granted by the Court on 4 December 2024. The covering letter re-submitting the Application for re-determination is dated the next day – the 5 December 2024 (the **Cover Letter**). The Cover Letter sets out that other than the addition of an overshadowing assessment and a daylight and sunlight report, there are "*no other changes to the [P]roposed [D]evelopment*".

10.5 We do not consider that the Applicant intended to make any amendments to the Proposed Development, despite attending meetings with our Client, as is evidenced by the lack of any amendments to the Application following re-submission.

11. Conclusion

11.1 For the reasons set out in this letter the Application should be refused.

11.2 The lack of any good faith engagement by the Applicant with the public and key stakeholders is concerning. We urge the City to determine the Application by planning committee so that the Application is thoroughly debated and discussed.

11.3 Kindly acknowledge receipt of this letter of objection in writing.

Yours sincerely

Farrer & Co LLP

Committee: Planning Applications Sub Committee	**Date:** 28th May 2025
Subject: 55 Fleet Street, EC4Y 1JU Change of use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).	**Public**
Ward: Farringdon Without	**For Decision**
Registered No: 24/00635/FULL	**Registered:** 18/06/24
Conservation Area: Fleet Street	**Listed Building:** N/A

Summary

The application site at 55 Fleet Street is a five-storey building with basement level located on the western end of Fleet Street, situated on its southern side with the ground floor eastern elevation fronting Pleydell Court.

The application proposes the change of use from Class E offices to *sui generis* Adult Gaming Centre, across ground floor and part basement levels.

The loss of office floorspace has not been evidenced through information regarding financial viability nor through evidence of a marketing exercise. The proposed loss of the ground floor would also harm the quality and attractiveness of the office floorspace remaining on the floors above ground floor level. The proposal would also fail to provide a visually or physically permeable active frontage, causing harm to the Fleet Street Primary Shopping Centre, failing to maintain or enhance its vitality or viability.

Furthermore, by reason of the shared access to the rear of the property, its lack of active frontages, and its operation 24 hours a day and 7 days a week, the proposal would have a detrimental impact on the safety and security of the building and surrounding areas.

The application itself lacks information concerning operational management, safety and security, protection of residential amenity through noise and disturbance, and servicing and waste management, and as such it has not been demonstrated that there would be an acceptable impact with regards to any of these considerations.

24 Objections received. A petition has been submitted objecting to the proposal with 186 signatories.

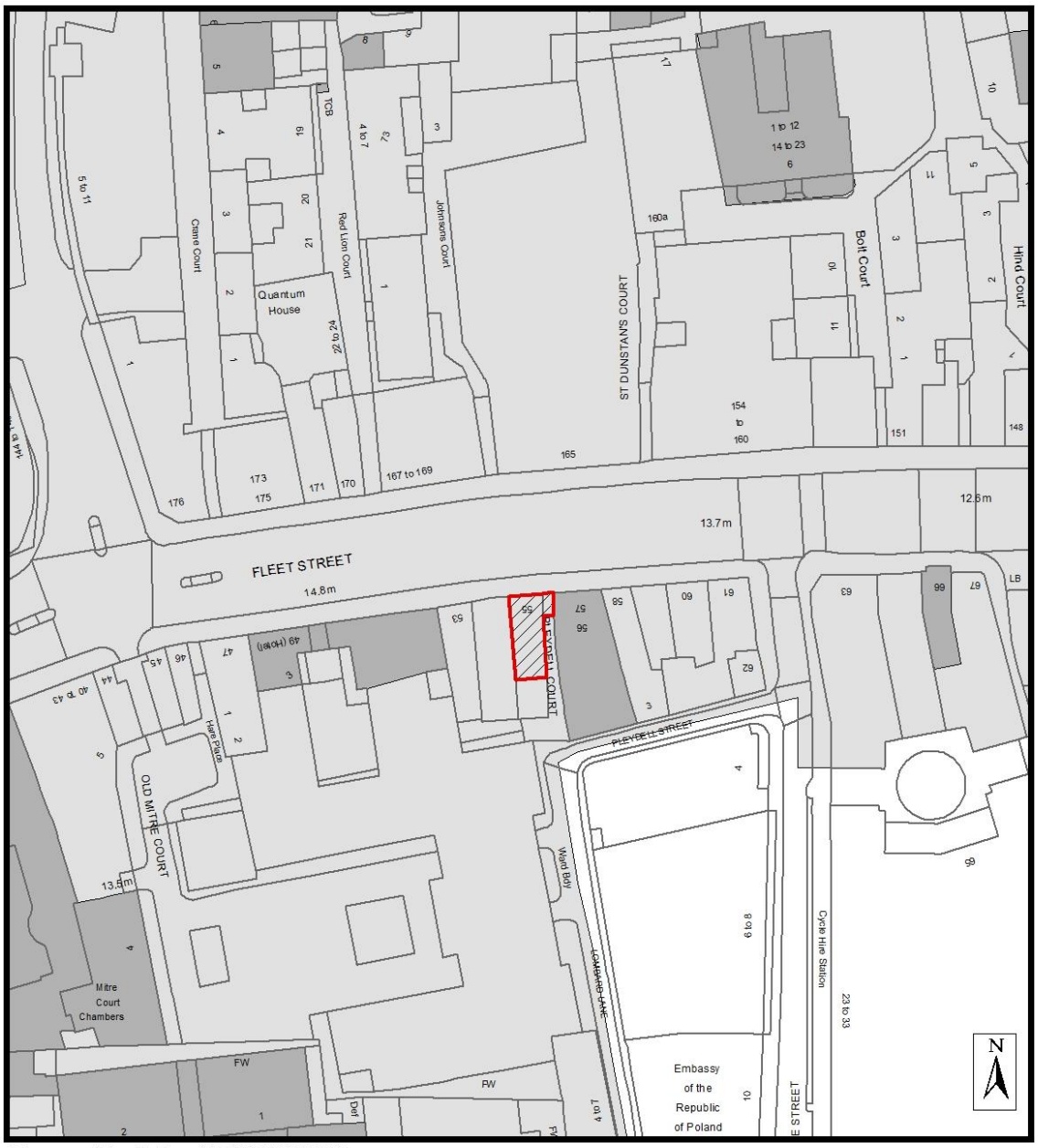
Recommendation

That the Development Director be authorised to issue a decision notice refusing Planning Permission for the above proposal for the following reasons:

1. The proposal fails to justify the acceptability of the loss of office floorspace, including a lack of justification for the impact of the proposal on the office floorspace within the remainder of the building above ground floor level, and with no demonstration that the proposal meets the wider objectives of the Local Plan. The proposal would therefore be contrary to London Plan Policy E1 (Offices), Local Plan Policies CS1 (Offices) and DM1.1 (Protection of Office Accommodation), draft City Plan 2040 Policies S4 (Offices) and OF2 (Protection of Existing Office Floorspace), and the City of London Office Use SPD.
2. The proposals would fail to maintain or enhance the vitality or viability of the area as a Primary Shopping Centre, including through its failure to provide physically and visually permeable active frontages, contrary to Local Plan Policies CS20 (Retailing), DM10.1 (New Development) and DM20.1 (Principal Shopping Centres), and draft City Plan Policies S5 (Retail and Active Frontages) and OF2 (Protection of Existing Office Floorspace).
3. By reason of the shared access to the rear of the building and the resulting harm to the security of the building, the failure of the proposal to provide active frontages and the proposed operation being undertaken twenty-four hours a day and seven days a week, the proposal has failed to demonstrate that it would be adequately designed to ensure the safe and secure operation of the premises, or maintain the safety and security of the spaces around the building, contrary to Local Plan Policies CS3 (Security and Safety) and DM3.2 (Security Measures in New Development and Around Existing Buildings), and draft City Plan Policies S2 (Safe and Secure City), SA3 (Designing in Security) and S8 (Design).

4. By reason of a lack of information submitted to determine their impacts, as related to operational management, safety and security, protection of residential amenity through noise and disturbance, and servicing and waste management, it has not been demonstrated that there would be an acceptable impact with regards to any such matters. Therefore, the proposal is not in accordance with London Plan Policy D13 (Agent of Change), Local Plan Policies CS3 (Security and Safety), DM21.3 (Residential Environment), and DM3.5 (Night-Time Entertainment), and draft City Plan Policies CV5 (Evening and Night-Time Economy) and SA2 (Safe and Secure City).

Site Location Plan



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ADDRESS:
55 Fleet Street

CASE No.
24/00635/FULL

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Main Report

Site

1. 55 Fleet Street is a five-storey building with basement level located on the western end of Fleet Street, situated on its southern side and with the eastern elevation of the property in question having a ground floor elevation which fronts on to Pleydell Court to the east. The works proposed within this planning application concern the ground floor and part basement level of the building (totalling c. 89m^2).
2. The site lies within the Fleet Street Conservation Area and the Fleet Street Principal Shopping Centre.
3. While currently vacant, the building was previously occupied as offices by a solicitors' firm across the entirety of the building.
4. The building is not statutorily listed.

Relevant Planning History

5. There is no planning history relevant to the proposal, while a planning application has been submitted for residential use at part basement, part ground floor and all upper storeys of the building. Insufficient information has been submitted to validate this application while the applicant has confirmed their intention to submit further information in support of that application.

Licensing

6. The proposed use would require a Gambling Premises License, under the Gambling Act 2005, to operate. At time of writing such an application has not been submitted.

Proposals

7. The proposed works comprise the change of use at ground floor and part of basement level from existing Class E use (now-vacated offices) to a *sui generis* use as an Adult Gaming Centre.

8. At ground floor level, this constitutes the installation of slot machines at the blank elevation facing west and against the eastern elevation which features windows onto Pleydell Court. A window display is to be installed fronting Fleet Street.

9. At basement level, it is proposed that areas be used by staff of the Adult Gaming Centre for refuge and comfort facilities, alongside storage space.

10. The Adult Gaming Centre is proposed to be open 24 hours a day and seven days a week.

11. No external alterations are proposed.

Consultation

12. A site notice was erected on 1st August 2024, and a press notice published on 6th August 2024. Letters were also dispatched to those in the vicinity on 29th July 2025.

13. Twenty four representations were received, all objecting to the proposal. A petition objecting to the proposal was also received featuring 186 signatories. Copies of the representations received are appended to this report. The themes raised within these representations are summarised in the table below:

Principal Themes	No. of comments on this theme	Response
Undermining the function and purpose of the Primary Shopping Centre	18	The impact of the proposal on the Primary Shopping Centre is addressed at paragraphs 37 to 42
Proposal is contrary to policy DM20.1	8	The compliance of the proposal with Policy DM20.1 is addressed at paragraphs 37 to 42
Proposal is contrary to policy DM3.5	8	The compliance of the proposal with Policy DM3.5 is addressed at paragraphs 43 to 48
Heightened risk of criminal or anti-social behaviour, security concerns	18	An assessment of these matters is considered below in paragraphs 49 to 56.
Harm to residential amenity	18	An assessment of these matters is considered below in paragraphs 42 to 48.
Increased noise and residential amenity	6	An assessment of these matters is considered below in paragraphs 42 to 48.

Out of keeping with neighbourhood	8	Where this relates to its impact on residential amenity and its impact on the Primary Shopping Centre, this is addressed in the report below.
Not in line with the City Plan	8	This recommendation has been made in line with the adopted Local Plan and giving appropriate weight to the draft policies of the City Plan 2040.
Negative impact on character and/or function of the area	5	As noted above, where this relates to residential amenity and the Primary Shopping Centre this is addressed in the report below.
Gambling premises out of keeping with Fleet Street regeneration	3	Where related to impacts on the Primary Shopping Centre, this is addressed in the report below.
Could put off quality independent retailers	2	Where related to impacts on the Primary Shopping Centre, this is addressed in the report below.
Not in keeping with history of area	4	The impact of the proposal on the character of the area is assessed in paragraphs 37 to 49 below.
Not in keeping with Fleet Street Conservation Area	1	This is addressed as paragraph 49 of this report.
Gaming shouldn't be facilitated to the detriment of vulnerable	2	As noted at paragraph 35 of this report, there is no policy prohibition against the type of use being proposed, should it meet the other objectives of the Local Plan. The operation of

adults		the premises would also be subject to licensing requirements.
Does not add to/detracts from the area	4	The impact of the proposal on the character of the area is assessed in paragraphs 37 to 48 below.
Does not promote Corporate Plan objectives of the City of London	1	This recommendation has been made in line with the adopted Local Plan and giving appropriate weight to the draft policies of the City Plan 2040.
Not in line with priorities of the City Plan	1	This recommendation has been made in line with the adopted Local Plan and giving appropriate weight to the draft policies of the City Plan 2040.
Gambling shouldn't be encouraged	1	As noted at paragraph 35 of this report, there is no policy prohibition against the type of use being proposed, should it meet the other objectives of the Local Plan. The operation of the premises would also be subject to licensing requirements.

14. Not summarised in the table above are the matters raised within the petition, which are summarised as follows:

- Harm to the Primary Shopping Centre
- Harm to residential amenity
- Proposal is contrary to Policy DM20.1
- Proposal is contrary to Policy DM3.4

- Heightened risk of anti-social behaviour

15. Responses were also received from consultees, the Environmental Health Department and the City of London Police.

16. Environmental Health Officers recommended conditions related to the proposals, including opening hours contrary to those proposed. These are not relevant given the proposals are recommended for refusal.

17. The City of London Police attended a site visit to the property and provided their comments following. On the 24 hour a day operation, the CoL Police confirmed they would not support this, and provided detailed recommendations on necessary upgrades to the premises if the proposed use was to be considered appropriately secure. They additionally confirmed that they would object in principle to the use of the ground and floor and basement levels for the proposed use, given the additional security risks this would cause. The safety and security of the premises is assessed in relevant section of this report below.

Policy Context

18. The development plan comprises the London Plan (2021) and the City of London Local Plan (2015). The policies of these documents relevant to the consideration of this case are set out in Appendix A of this report.

19. The City of London is preparing a new draft emerging plan, the City Plan 2040, which is currently undergoing examination in public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan 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 A to this report.

20. 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.

21. The National Planning Policy Framework states at para 2 that “planning aw requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.

22. Chapter 7 of the NPPF seeks to ensure the continued vitality of town centres.

23. Paragraph 90 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

    a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

    b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

    c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;

    d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;

    e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

    f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

24. Chapter 8 of the NPPF seeks to promote healthy and safe communities.

25. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places, and beautiful buildings which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

26. Paragraph 98 then states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Considerations

27. The Corporation in determining the planning application has the following statutory duties to perform:

- To have regard to the provisions of the Development Plan, so far as material to the application to any other material considerations (Section 70 of the Town and Country Planning Act 1990); and
- To determine the application in accordance with the development plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

28. The principal issues in considering this application are:

- The extent to which the proposals comply with the relevant policies of the Development Plan.
- The impact of the proposals on residential amenity.
- Anti-Social Behaviour and Public Safety.
- Access.
- Servicing and Waste.
- Transport and Cycle Parking.

Principle of Development and Land Use

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

30. London Plan Policy E1 (Offices) supports increases in the current office stock. Likewise, Core Strategic Policy CS1 (Offices) of the Local Plan and Strategic

Policy S4 (Offices) of the Draft City Plan 2040 seek to ensure that the City provides additional office accommodation to meet demand from long term economic and employment growth.

31. Local Plan Policy DM1.1 (Protection of Office Accommodation) and draft City Plan Policy OF2 (Protection of Existing Office Floorspace) seek to protect office accommodation. Policy DM1.1 seeks to prevent the loss of existing office accommodation where the building is considered suitable for long term viable office use and there are strong economic reasons why the loss would be inappropriate. This is then set out as follows: "losses would be inappropriate for any of the following reasons:

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

32. The supporting text (paragraph 3.1.8) to Local Plan Policy DM1.1 and the Office Use SPD indicate that proposals for the loss of office space will normally be refused if the building or site is considered suitable for long-term viable office use. The Local Plan indicates that, exceptionally, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan.

33. Neither a Financial Viability Appraisal nor marketing evidence has been submitted to support the application. While the proposal would result in the loss of a small amount of office floorspace, totalling 89m^2, the loss of the ground floor space to provide a lobby or reception for the remaining building would diminish the quality of the office use across the building in its entirety.

34. The remaining office floors of the building would be accessed only by a smaller entrance on Pleydell Court to the east, an off-street location unlikely to be attractive to potential occupiers, and the internal part of this access would be shared with the Adult Gaming Centre use. As such, it is not clear how both uses would be accommodated on site without harm to the attractiveness of the office use at above-ground-floor level.

35. In the absence of viability evidence and marketing evidence in line with adopted policies DM1.1 and the Office Use SPD, and emerging City Plan 2040 Policy OF2, it has not been demonstrated that the loss of office use would be acceptable.

36. Furthermore, the proposed loss of this office space would harm the quality of the office floorspace above. While there is a currently pending application for the conversion of the upper floors to residential use, this application is also not supported by viability or marketing evidence. There is also an inherent conflict between the use of the ground floor for a use considered to be at a higher security risk and at a greater risk of attracting anti-social behaviour and the introduction of a residential use immediately above.

37. It has not been demonstrated that the proposed loss of office space would be acceptable in principle. As noted above, the Local Plan indicates that, exceptionally, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan. Whether the proposed alternative use meets the objectives of the Local Plan is addressed below.

38. Turning to the acceptability of the proposed use, subject to the impacts of the use on residential amenity and the character of the area, as well as its ability to meet the objectives of the Local Plan and draft City Plan 2040, and notwithstanding its ability to gain the required licence for its activities, there is no policy prohibition against such a use.

39. It should be noted that it is officers' view that the proposed use does not constitute a retail use, and therefore is not supported by the policies of the Development Plan which seek to encourage retail uses in the Primary Shopping Centre. This is addressed further in paragraphs 40 to 44 below.

Impact on Character of the Area and Residential Amenity

40. Local Plan Policy DM10.1 (New Development) asks that all developments include attractive and visually interesting street level elevations, provide active frontages wherever possible and maintain or enhance the vitality of the City's streets. Policy CS20 looks to give priority to shops (former Class A1 uses, now in Class E(a)) as well as seeking to enhance the environment in the Primary Shopping Centres (PSC) with specific focus on improving conditions for pedestrians, improving accessibility for all and ensuring a safe and secure retail environment. Draft Policy S5 (Retail and Active Frontages), where relevant to the proposal, encourages the provision of active frontages informed by the character and function of the surrounding area, with supporting text in paragraph 6.1.6 setting out that active frontages are related to specified uses (of which an Adult Gaming Centre is not listed) provided that such uses also facilitate visual and physical permeability of the building.

41. This is reflected in Policy DM20.1 (Principal Shopping Centres) which seeks to protect the frontages within PSC, asking specifically that the contribution each unit makes to the function and character of the PSC be considered as well as the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, and the location of the unit within the frontage.

42. Lastly, draft Policy OF2 would ask that where a loss of office space is justified appropriately that ground floor uses include active frontages and would be within a use considered complementary to continued office use of the upper floors.

43. The proposed change of use within a PSC would not provide an active frontage, achieving neither physical nor visual permeability in the street scene. This would harm the street scene and the overall vitality and viability of the PSC. This harm is then compounded by the unit's sharing its eastern elevation with Pleydell Court, as an off-street lane which would suffer from a reduction in passive surveillance and activity.

44. As such, this would result in harm to the character of the area contrary to adopted and emerging policies, including adopted policies CS20, DM10.1, and DM20.1, and draft Policies S5 and OF2.

45. Turning to residential amenity, Local Plan Policy DM21.3 (Residential Environment) seeks to protect residential amenity in residential areas, resisting uses which would cause undue noise disturbance, fumes and smells, and vehicle or pedestrian movements likely to cause disturbance, with new development near existing dwellings required to demonstrate adequate mitigation measures to address any detrimental impact.

46. Local Plan Policy DM3.5 (Night-time entertainment) and Draft Local Plan Policy CV5 (Evening and Night-Time Economy) sets out that any proposals for new night-time entertainment and related uses will only be permitted where there is no unacceptable impact on the amenity of residents or on environmental amenity, taking into account the potential for noise, disturbance and odours from the operation of the premises, customers arriving and leaving the premises and the servicing of the premises.

47. London Plan Policy D13 sets out the Agent of Change Principle, under which new noise and other nuisance generating development proposed close to residential should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

48. Adopted Policy DM3.5, draft Policy CV5 and draft Policy SA2 (Dispersal Routes) states that applications for night-time entertainment and related uses should include a Management Statement setting out how any impacts on residential amenity and environmental amenity will be addressed and setting out proposals for the dispersal of patrons.

49. The submission material has not included a Management Strategy and as such it has not been demonstrated that there is an adequate dispersal strategy to enable the use across the night-time hours, an impact worsened by the proposed 24-hour opening times. There are dwellings in the surrounding area, to the north, west, south and east, and without the submission of a Management Strategy, it has not been demonstrated that such a use, undertaken 24 hours a

day and 7 days a week, would not cause harm to residential amenity. As such, the proposal does not comply with the policies highlighted above.

50. The application has been submitted with a noise report concluding that the noise of internal activities, existing plant machinery, and leaving customers is expected to be low. Specifically where addressing the impact of outdoor customer noise, the report does not include a detailed assessment of the likely noise overnight or substantive evidence related to the expected profile/scale of customers leaving the premises during the night, as well as referring to residential uses at first floor and above only, as related to the application submitted concerning proposed residential use at the same site.

51. Should the application have been recommended for approval, Environmental Health Officers have recommended the use of conditions, including controlling opening hours so that it would be closed to customers between 23:00 and 08:00, prohibiting live music, requiring self-closing doors, and requiring the submission of an acoustic report. As the application is recommended for refusal these conditions are not relevant, and it should be noted that the recommendation to restrict the opening hours through condition represents an objection to the twenty-four hour opening times proposed.

52. Noting the potential impact on the Conservation Area, the proposed works include no external changes to the building. Insofar as matters which would be considered development, no part of the proposal would impact the character or appearance of the Fleet Street Conservation Area. While advertising and signage may be intended for installation, this would be subject to the requirement to gain advertisement consent through a separate application, or would be granted deemed consent under nationally imposed regulations.

Anti-Social Behaviour and Public Safety

53. Policy CS3 (Security and Safety) of the adopted Local Plan seeks to ensure that the City remains secure from crime and disorder by, where relevant to the proposed works, ensuring that:

- The City's dense network of buildings and spaces, including the activities they contain, is designed to be safe, minimising the potential for crime and anti-social behaviour and providing for a mix of uses and natural surveillance of streets and spaces;
- Security and safety measures are of an appropriate high quality design; and
- Night-time uses are proactively managed to minimise disturbance to residents and workers.

54. Policy DM3.2 (Security Measures in New Developments and Around Existing Buildings) then seeks to ensure that security measures are included in new developments, and applied to existing buildings and their curtilage, by requiring:

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

55. Draft policies within the emerging City Plan 2040 referring to safety and security include Policy S8 (Design), where clause 24 requires new development to incorporate necessary safety and security measures, Policy S2 (Safe and Secure City), which seeks to ensure the City is safe from crime/anti-social behaviour through measures including increases in natural surveillance, and Policy SA3 (Designing in Security), which asks that new development complies with Secured by Design principles.

56. The City of Police have provided advice which has specified no objection to the proposal in principle, albeit their recommendations include substantial security interventions across the premises. They also recommend the removal of the basement from the proposal, and have stated that they do not support the premises being open 24 hours a day – noting the greater potential to attract crime as a result of these extensive hours.

57. Considering the removal of the basement from the AGC premises, this does not form a part of the proposal subject to this report. Notwithstanding, it is not clear how the proposed use would function in terms of staff welfare, servicing or waste storage without use of the basement of the building.

58. In this context, the proposal does not comply with the recommendations of the City of London Police.

59. The City of London Police have also made reference to the potential restriction through the Gambling Act 2005 requiring that there be no clear views into the property. As linked to the assessment considering the detrimental impact of the lack of active frontages, such a requirement would compound this circumstance further.

60. In summary, the proposal is considered to conflict with Policy CS3 and DM3.2, as well as emerging policies DS8, S2, and SA3.

Access

61. The site has level access to the public from Fleet Street and is accessed by a single-leaf door. There are no proposed changes to the access arrangements at the site.

Servicing and Waste

62. While the waste and servicing requirements expected of a use of the scale proposed are low, information as to delivery and servicing and waste storage has not been submitted. It is not clear how servicing and waste management will be achieved at both the proposed Adult Gaming Centre use concurrently with the same requirements for the office use at the floors above, particularly given the use of the basement in its entirety by the Adult Gaming Centre.

Transport and Cycle Parking

63. The site has a Public Transport Accessibility Level (PTAL) of 6b, on a scale from 0 to 6b, with eight bus routes serving the site along with nearby underground and overground stations. Given the high level of public transport accessibility for the site and the comparatively low capacity of the proposed Adult Gaming Centre, the proposals are unlikely to have a detrimental impact on the local transport network.

64. It is also considered that due to the small scale of the proposal and the lack of suitable space within the site, it would not be possible for cycle parking to be provided.

Public Sector Equalities Duty

65. When considering proposed development, the Public Sector Equality Duty requires the City of London Corporation to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

66. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any

other conduct that is prohibited by or under this Act.

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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

68. 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.

69. It is the view of officers that a decision to refuse permission would not disadvantage those who are protected under the Equality Act 2010.

Human Rights Act 1998

70. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being rights set out in the European Convention on Human Rights).

71. It is the view of officers that there would be no infringement of the ECHR as a result of this recommendation.

Conclusions

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

73. When taking the development plan as a whole, the proposal is considered to be contrary to the provisions of the Development Plan. As Local Planning Authority the application must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Officers do not consider that there are material considerations which would indicate that the application should be determined other than in accordance with the Development Plan.

74. As such, the proposal is recommended to be refused for the reasons as follows:

75. The proposal fails to justify, by reasons of its lack of marketing and viability evidence, the acceptability of the loss of office floorspace, including a lack of justification for the impact of the proposal on the office floorspace within the remainder of the building above ground floor level, and with no demonstration that the proposal meets the wider objectives of the Local Plan. The proposal would therefore be contrary to London Plan Policy E1 (Offices), Local Plan Policies CS1 (Offices) and DM1.1 (Protection of Office Accommodation), draft City Plan 2040 Policies S4 (Offices) and OF2 (Protection of Existing Office Floorspace), and the City of London Office Use SPD.

76. The proposals would fail to maintain or enhance the vitality or viability of the area as a Primary Shopping Centre, including through its failure to provide physically and visually permeable active frontages, resulting in harm to the character of the area contrary to Local Plan Policies CS20 (Retailing), DM10.1 (New Development) and DM20.1 (Principal Shopping Centres), and draft City Plan Policies S5 (Retail and Active Frontages) and OF2 (Protection of Existing Office Floorspace).

77. By reason of the shared access to the rear of the building and the resulting harm to the security of the building, the failure of the proposal to provide active frontages and the proposed operation being undertaken twenty-four hours a day and seven days a week, the proposal has failed to demonstrate that it would be adequately designed to ensure the safe and secure operation of the premises, or maintain the safety and security of the spaces around the building, contrary to Local Plan Policies CS3 (Security and Safety) and DM3.2 (Security Measures in New Development and Around Existing Buildings), and draft City

Plan Policies S2 (Safe and Secure City), SA3 (Designing in Security) and S8 (Design).

78. By reason of a lack of information submitted to determine their impacts, as related to operational management, safety and security, protection of residential amenity through noise and disturbance, and servicing and waste management, it has not been demonstrated that there would be an acceptable impact with regards to any such matters. Therefore, the proposal is not in accordance with London Plan Policy D13 (Agent of Change), Local Plan Policies CS3 (Security and Safety), DM21.3 (Residential Environment), and DM3.5 (Night-Time Entertainment), and draft City Plan Policies CV5 (Evening and Night-Time Economy) and SA2 (Safe and Secure City).

APPENDIX A: BACKGROUND PAPERS

Plan titled:

- Site Location Plan – Drawing No. 100047474
- Block Plans – Drawing No. 55FltStAGC/FUL/24/01
- Existing Plans – Drawing No. 55FltStAGC/FUL/24/02
- Proposed Plans – Drawing No. 55FltStAGC/FUL/24/03
- Proposed Plans (Safety Details) – Drawing No. 55FltStAGC/FUL/24/03/ Rev A

Document titled:

- Application Form
- CIL Form
- Planning Statement
- Noise Assessment

List of neighbouring objections (24 Objections, and Petition with 186 Signatories):

Dr Jennifer Cleverton	Objection
Rachel Blake MP	Objection
Ms Ann Holmes	Objection
Mr Oliver Sells	Objection
Miss Alpa Raja	Objection
Ms Amanda Singleton	Objection
Mrs Wendy Mead OBE CC	Objection
Miss Catherine McGuinness	Objection
Mr Jeremy Simons	Objection
Mr George Godfrey	Objection
Mrs Henrika Priest	Objection
Mr John Griffiths	Objection
Ms Leyla Ostovar	Objection
Ms Tana Adkin KC	Objection
Ms Helen Ladele	Objection
Ms Vasiliki Manta	Objection

Ms Adela Gregory	Objection
Ms Steph Steeden	Objection
Ms Sue Farrington	Objection
Ms Bethany Coombs	Objection
Ms Martha Grekos	Objection
Ms Jo Woods	Objection
Miss Alison Phillips	Objection
Tana Adkin, Beth Coombs et al.	Objection (petition, 186 signatories)

APPENDIX B: RELEVANT POLICES

Relevant London Plan Policies

Policy E1 – Offices

Policy D13 – Agent of Change

Relevant Local Plan Policies

CS1 – Offices

CS3 – Security and Safety

CS20 - Retailing

DM1.1 - Protection of Office Accommodation

DM3.2 - Security Measures in New Development and Around Existing Buildings

DM3.5 - Night-Time Entertainment

DM10.1 - New Development

DM20.1 - Principal Shopping Centres

DM21.3 - Residential Environment

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

City of London Office Use SPD (2018)

Relevant Draft City Plan 2040 Policies

S2 - Safe and Secure City

SA3 - Designing in Security

S8 - Design)

S4 – Offices

S5 - Retail and Active Frontages

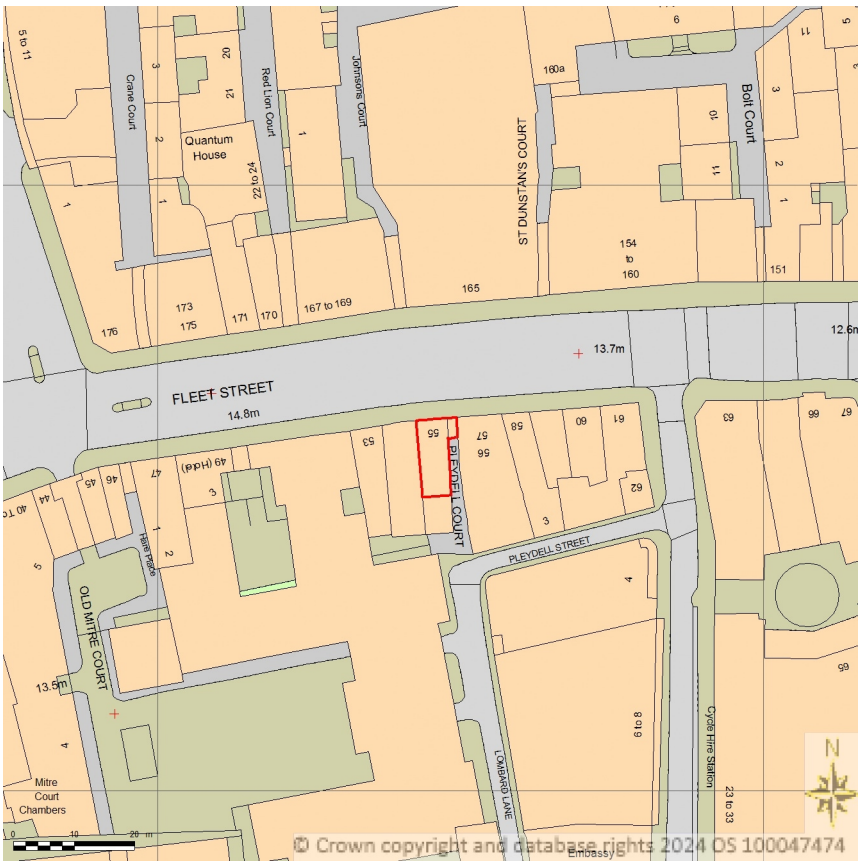
OF2 - Protection of Existing Office Floorspace

CV5 – Evening and Night-Time Economy

SA2 – Safe and Secure City

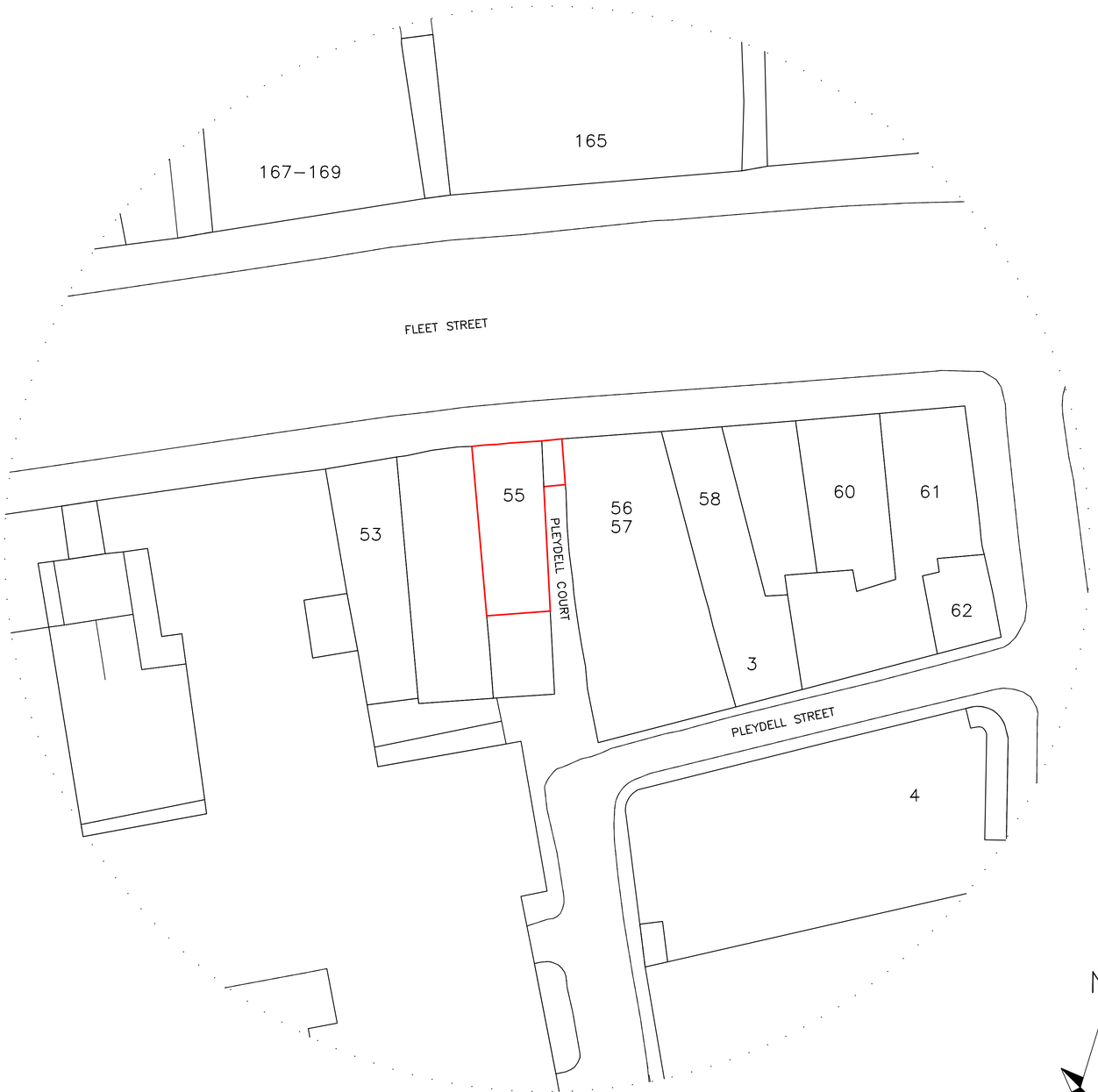
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SITE LOCATION PLAN
AREA 2 HA
SCALE: 1:1250 on A4
CENTRE COORDINATES: 531345 , 181159



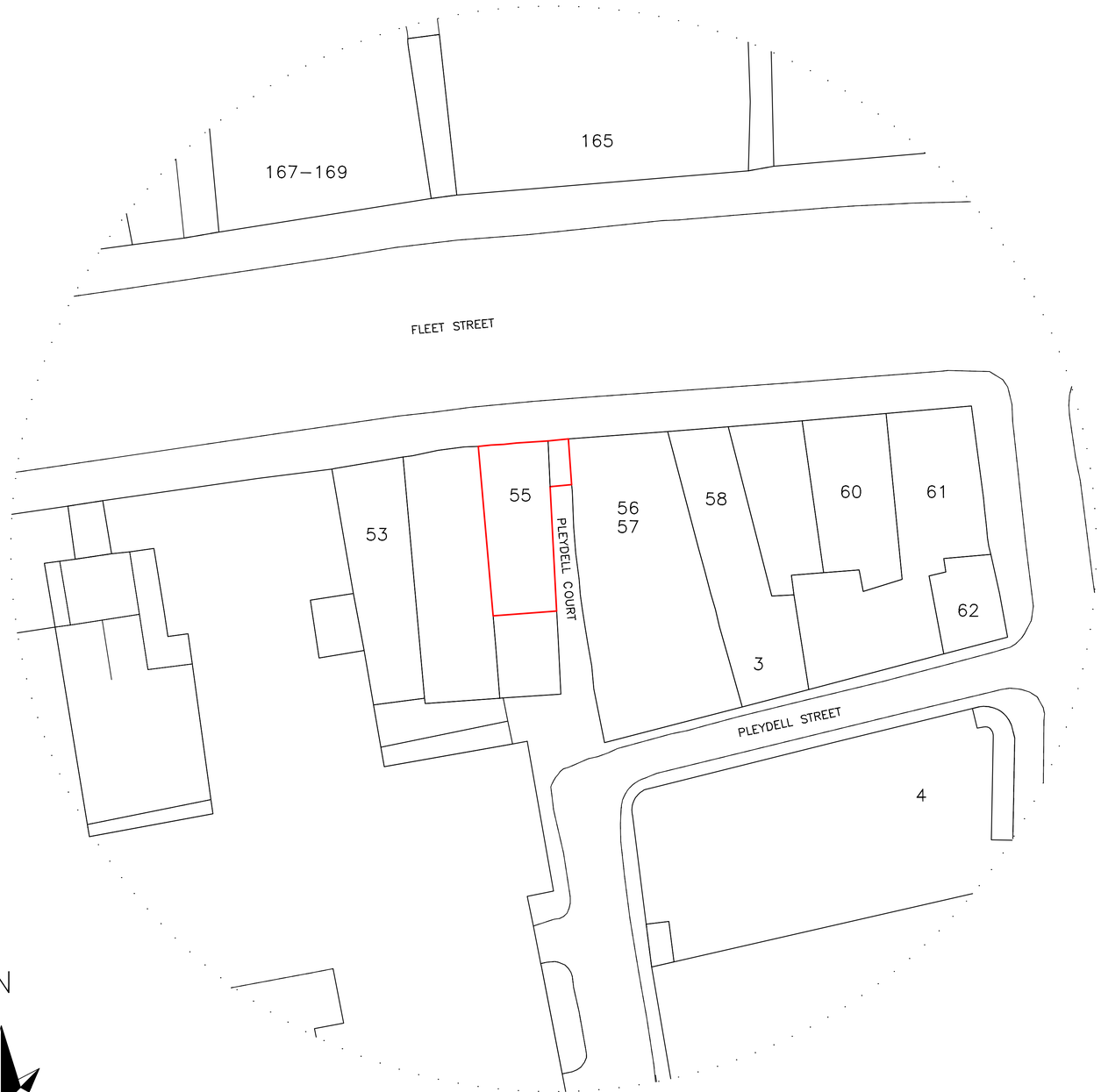
Supplied by Streetwise Maps Ltd
www.streetwise.net
Licence No: 100047474
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EXISTING BLOCK PLAN

N



PROPOSED BLOCK PLAN

NOTES

1. NECESSARY NOTICES ON RELEVANT ADJOINING OWNERS IN RESPECT OF WORKS ON THE PARTY WALL(S) ARE THE OWNERS RESPONSIBILITY. THE APPOINTMENT OF A PARTY WALL SURVEYOR IS ADVISED.
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SCALE 1:200

0M 4 8 12 16 20 24 28 32 36 40

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Drawing No.
55FltStAGC/FUL/24/01

Scale: 1:200

Paper: A1

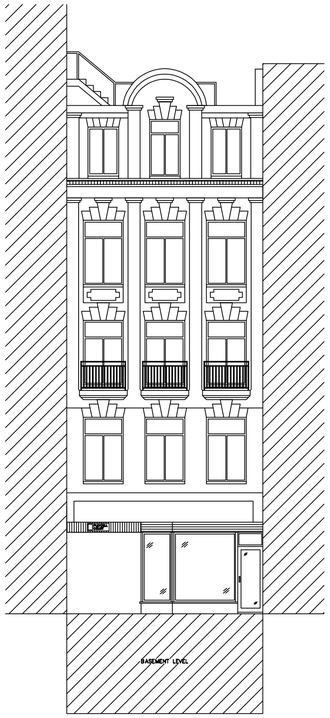
Issue Date: 16/05/2024

Client:
Astro Property Ltd

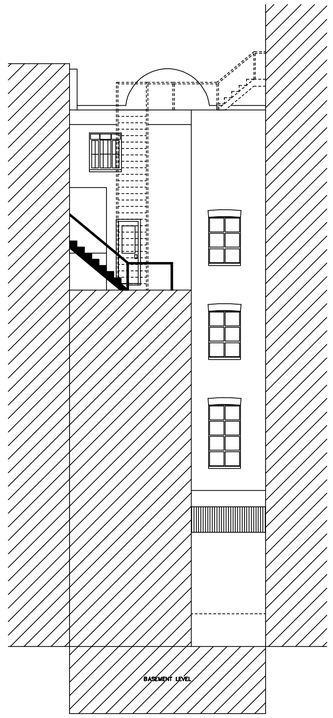
55 Fleet Street
Temple, London
EC4Y 1JU

Description:
'Change of Use' from vacant Office of Ground Floor & Part Basement Levels to Form an Adult Gaming Centre (AGC)

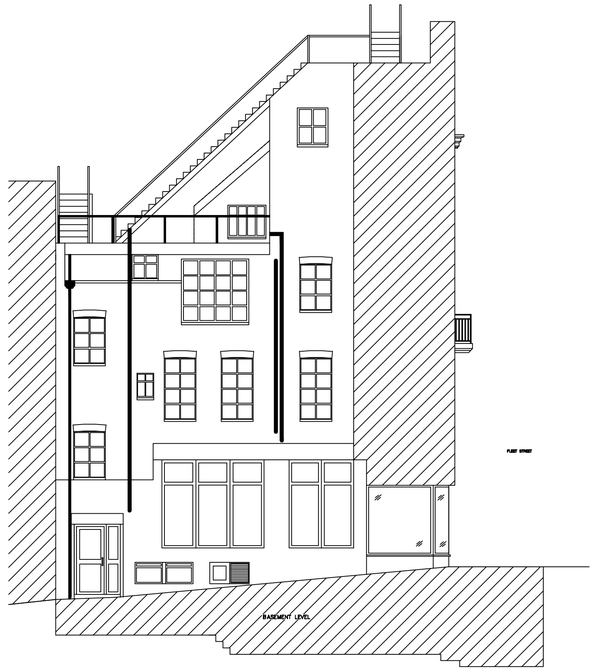
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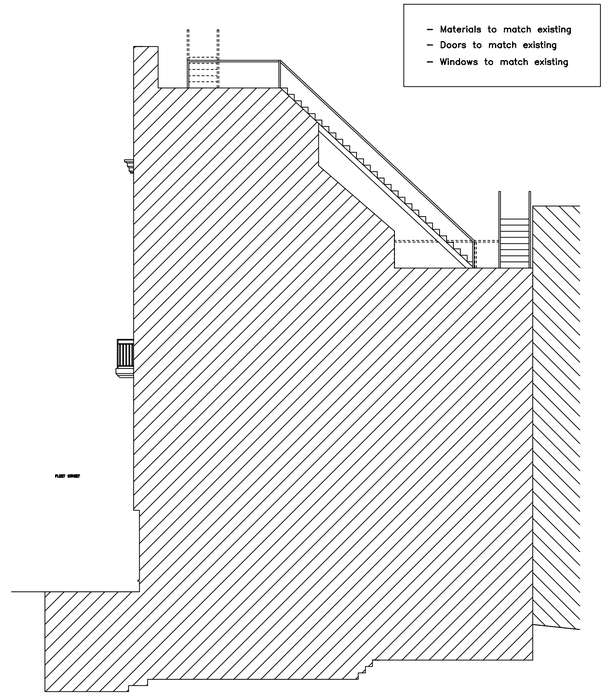
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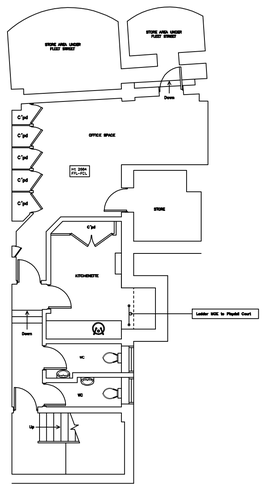
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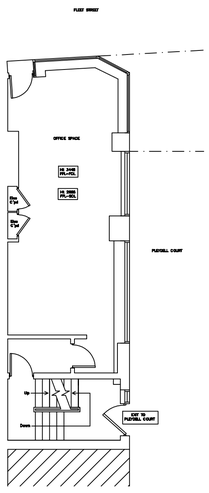
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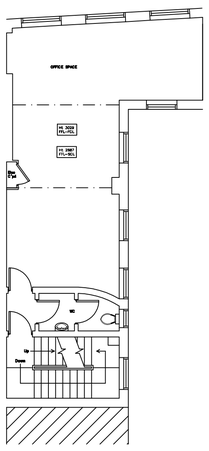
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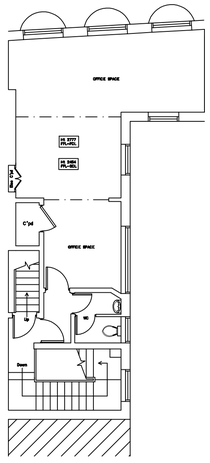
EXISTING BASEMENT FLOOR PLAN



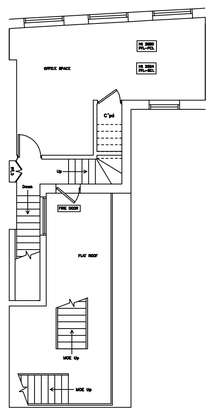
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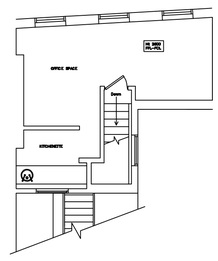
EXISTING FIRST FLOOR PLAN



EXISTING SECOND FLOOR PLAN

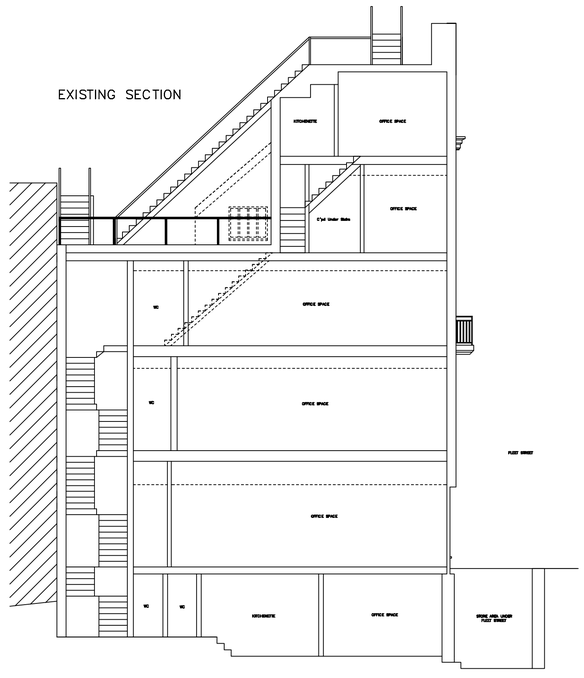


EXISTING THIRD FLOOR PLAN



EXISTING FOURTH FLOOR PLAN

EXISTING SECTION



FLOOR AREA:

BASEMENT = 42.3sqm
GROUND FLOOR = 36.2sqm
FIRST FLOOR = 43.1sqm
SECOND FLOOR = 39.2sqm
THIRD FLOOR = 25.7
FOURTH FLOOR = 25.1sqm

KEY:

FFL–FCL (Finished Floor Level – Finished Ceiling Level)
FFL–SCL (Finished Floor Level – Finished Suspended Ceiling Level)

SCALE 1:100

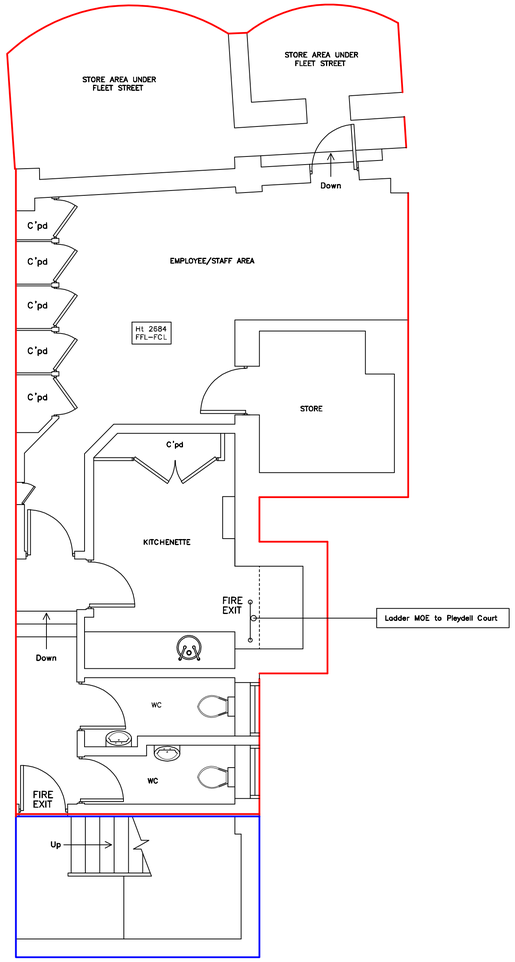
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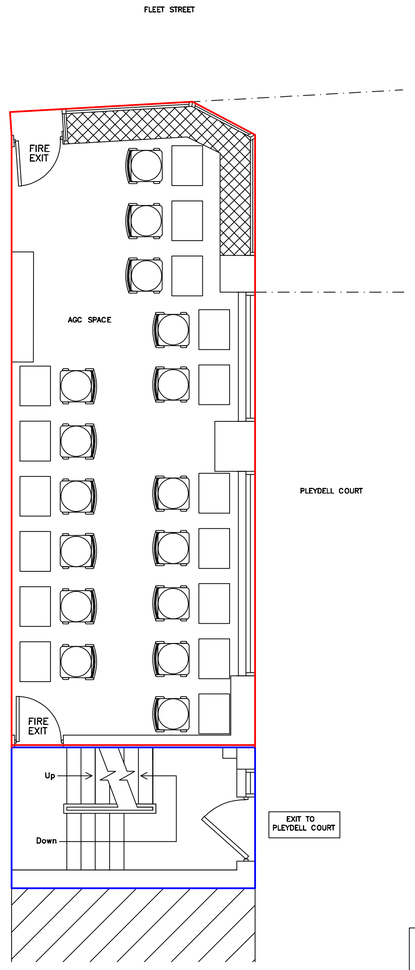
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Colneside Building Design www.colneside.co.uk 07976098772 colneside@gmail.com	Drawing No. 55FlitStAGC/FUL/24/02 Scale: 1:100 Paper: A1 Issue Date: 16/05/2024	Client: Astro Property Ltd 55 Fleet Street Temple, London EC4Y 1JU	Description: 'Change of Use' from vacant Office of Ground Floor & Part Basement Levels to Form an Adult Gaming Centre (AGC)

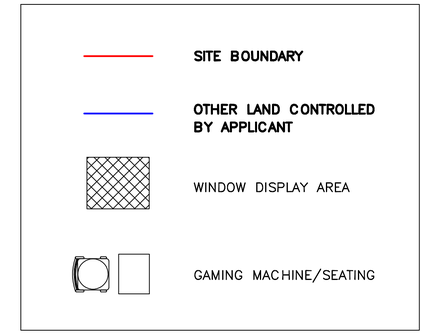
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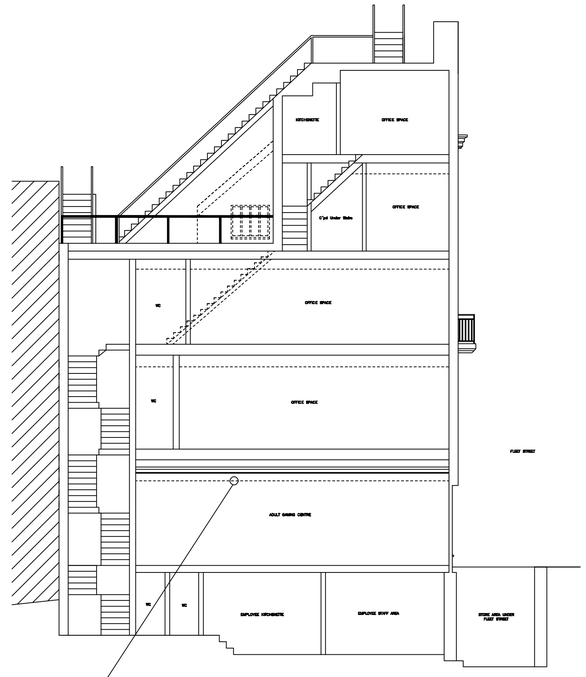


PROPOSED BASEMENT FLOOR PLAN
(1:50)



PROPOSED GROUND FLOOR PLAN
(1:50)





PROPOSED SECTION
(1:100)

PROPOSED SUSPENDED CEILING DESIGN:

Existing Timber Floor above with GL2 Brackets (150mm gap), 100mm acoustic insulation slabs, 1x 12.5mm acoustic plasterboard, 1x 12.5mm fireline board (staggered), 250mm (max) gap with suspended ceiling tiles under.

SCALE 1:50

0M 1 2 3 4 5 6 7 8 9 10

SCALE 1:100

0M 2 4 6 8 10 12 14 16 18 20

NOTES

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colneside@gmail.com

Drawing No.
55FitStAGC/FUL/24/03

Scale: 1:50 1:100
Paper: A1

Issue Date: 16/05/2024

Client:
Astro Property Ltd

55 Fleet Street
Temple, London
EC4Y 1JU

Description:
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SITE BOUNDARY

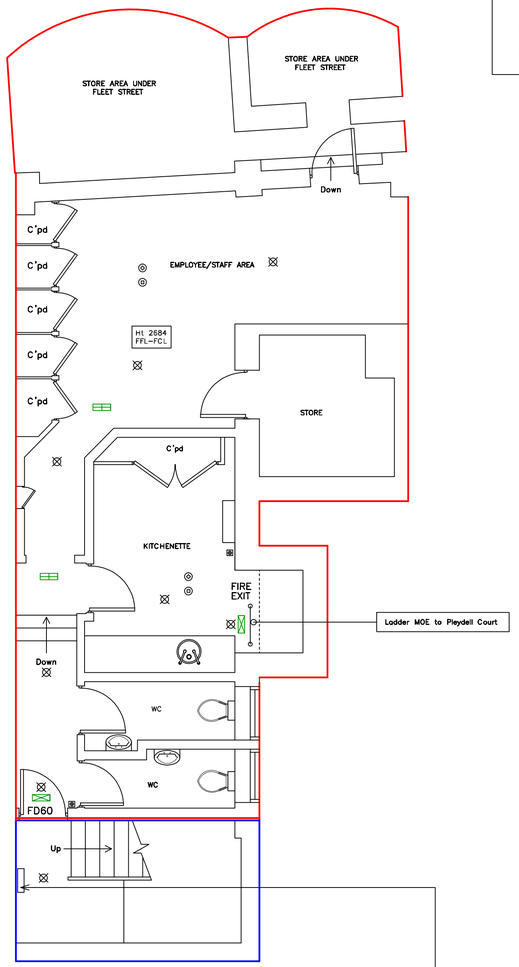
OTHER LAND CONTROLLED BY APPLICANT

WINDOW DISPLAY AREA

GAMING MACHINE/SEATING

- Internal & External Lighting to comply with Non Domestic Service Compliance Guide Section 12: Lighting Table 42 & 43 & BRE Digest 498 ' Selecting Lighting Controls'.
- Indoor Lighting to comply with BS EN 12464-1:2021 'Lighting of work places' Pendant LED lighting (800watt) to hang 4.2m from Finished Floor Level at 5.0m spacing.
- All light fittings to maintain an average 95 luminaire lumens per circuit watt
- If required all light fittings to be installed with TP(b) flammability-rated diffusers

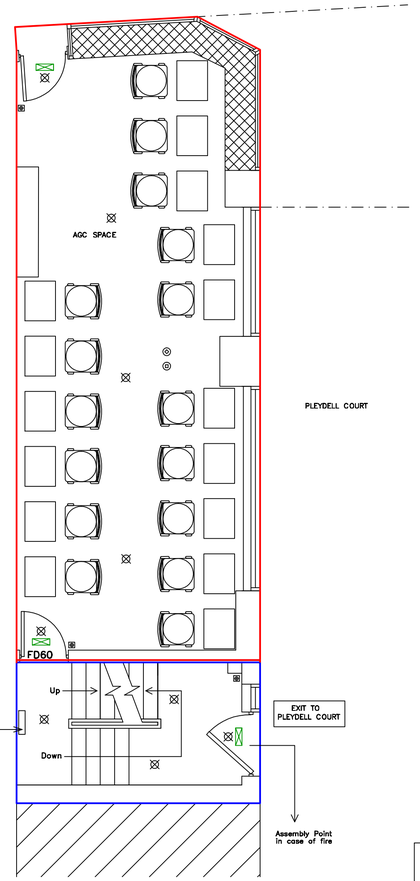
- Principal Contractor to Comply with Current CDM & Building Regulations
- F10 Notification to be Submitted to Health & Safety Executive Before On-Site Works Commence
- Emergency Lighting to be in accordance with BS 5266-1: 2016
- Fire Extinguishers are to be provided in accordance with BS EN3
- Fire alarm system to comply with BS 5839-1: 2017 & manual call points to comply with Part 2: 1983
- Fire safety exit signs to comply with BS 5499 & the Safety Signs and Signals Regulations 1996
- Final exit signs positioned above doors at 2.3m from finished floor level
- Simple single action fastenings are to be positioned to all doors on escape route with final exit door to have panic bolts fitted with heights complying with Part M of the Building Regs
- Competent Persons & Parties are to be Employed Throughout the Construction Phase
- Construction Phase Plan to be Provided by the Principal Contractor & Reviewed by the CDM Co-ordinator
- All Information Provided is to be Reviewed & Commented on by CDM Co-ordinator Before Works Commence
- Owner or Main Contractor to Confirm Means Of Escape FD60s are in position to all Escape Routes
- Light Level Requirements to BS 5266
- Emergency Lighting Duration to be Minimum 3 hours
- Ducting to comply with BS EN 12101-7 for smoke extraction
- Manually operated non-powered entrance door to have an opening force at the leading edge and will be no greater than 20N. If fitted with a latch the door will have a Lever Handle and contrast visually with the surface of the door & not be cold to the touch



PROPOSED BASEMENT FLOOR PLAN
(1:50)

CASULTY EVACUATION STRETCHER





PROPOSED GROUND FLOOR PLAN
(1:50)

EMERGENCY LIGHTING

INTERCONNECTED SMOKE ALARM

HEAT DETECTOR

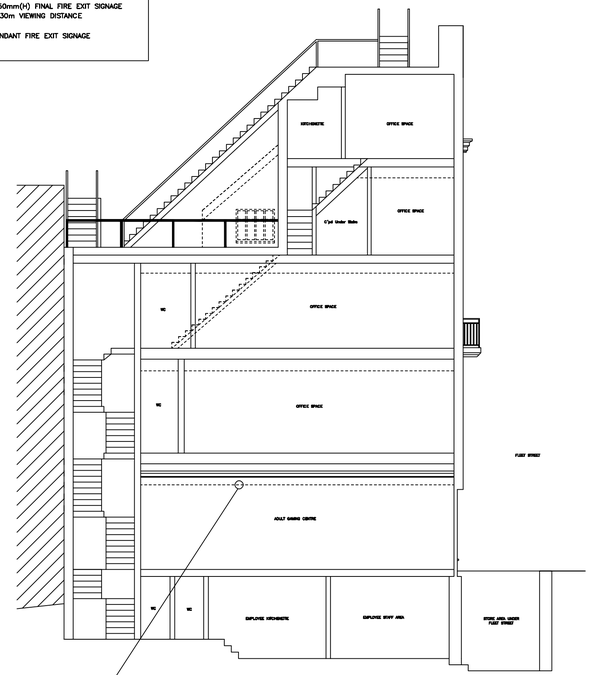
FIRE ALARM POINT + FIRE FIGHTING EQUIPMENT (Extinguisher & Fire Blanket)

400mm(W) x 150mm(H) FINAL FIRE EXIT SIGNAGE = 30m VIEWING DISTANCE

DIRECTIONAL PENDANT FIRE EXIT SIGNAGE

PROPOSED SUSPENDED CEILING DESIGN:

Existing Timber Floor above with GL2 Brackets (150mm gap), 100mm acoustic insulation slabs, 1x 12.5mm acoustic plasterboard, 1x 12.5mm fireline board (staggered), 250mm (max) gap with suspended ceiling tiles under.



PROPOSED SECTION
(1:100)

SCALE 1:50

0M 1 2 3 4 5 6 7 8 9 10

SCALE 1:100

0M 2 4 6 8 10 12 14 16 18 20

NOTES

1. NECESSARY NOTICES ON RELEVANT ADJOINING OWNERS IN RESPECT OF WORKS ON THE PARTY WALLS(S) ARE THE OWNERS RESPONSIBILITY. THE APPOINTMENT OF A PARTY WALL SURVEYOR IS ADVISED.
2. ALL DIMENSIONS ARE TO BE CHECKED ON SITE BEFORE ORDERING MATERIALS OR COMMENCING WORK.
3. IN CASE OF DISCREPANCIES IN DRAWINGS OR DETAILS REFER TO DRAFTSMAN FOR CLARIFICATION BEFORE ONSITE WORKS COMMENCE. UNILATERAL DECISIONS BY CLIENT OR CONTRACTOR WILL NOT BE ACCEPTED. DRAFTSMAN DOES NOT ACCEPT RESPONSIBILITY FOR ADDITIONAL COSTS OF ADDITIONAL MATERIALS ETC. AS A RESULT OF UNILATERAL DECISIONS.
4. FOR ANY INFORMATION NOT COVERED BY THESE DRAWINGS REFER TO DRAFTSMAN FOR CLARIFICATION.
5. THE CONTRACTOR MUST ENSURE THAT SITE WORK IS BEING CARRIED OUT TO THE LATEST REVISIONS OF ALL WORKING DRAWINGS BEFORE WORKS COMMENCE.
6. IT IS THE CONTRACTORS RESPONSIBILITY TO INFORM THE LOCAL AUTHORITY BEFORE WORK COMMENCES ON SITE AND AT ALL PRESCRIBED STAGES OF WORK THAT THE DISTRICT SURVEYOR MAY REQUIRE.
7. IF WORK COMMENCES ON SITE BEFORE FULL PLANS APPROVAL HAS BEEN GIVEN THE DRAFTSMAN ACCEPTS NO RESPONSIBILITY FOR ANY ADDITIONAL WORK OR MATERIALS THAT THE DISTRICT SURVEYOR MAY REQUIRE.
8. THIS DRAWING AND ALL COPIES PRODUCED REMAIN THE COPYRIGHT AND PROPERTY OF THE DRAFTSMAN. IT MAY ONLY BE REPRODUCED BY THE DRAFTSMAN AND ALL COPIES MUST BE RETURNED TO THE DRAFTSMAN IF DEMANDED.
9. BY USING THIS DRAWING THE USER AND HIS EMPLOYEE SIGNIFY THEIR AGREEMENT OF THE ABOVE TERMS AND CONDITIONS.
10. THIS DRAWING AND OTHERS IN RESPECT TO THIS PROPERTY WILL FORM PART OF THE CONTRACT DOCUMENTATION AND ARE TO BE READ IN CONJUNCTION WITH THE SPECIFICATION ACCOMPANYING THESE DRAWINGS.

Colneside Building Design
www.colneside.co.uk
07976098772
colneside@gmail.com

Drawing No.
55FltStAGC/FUL/24/03 REV A

Scale: 1:50 1:100

Paper: A1

Issue Date: 06/09/2024

Client:
Astro Property Ltd

55 Fleet Street
Temple, London
EC4Y 1JU

Description:
'Change of Use' from vacant Office of Ground Floor & Part Basement Levels to Form an Adult Gaming Centre (AGC)

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plans@cityoflondon.gov.uk
Tel: 020 7332 1710

Department of Planning & Transportation
PO Box 270, Guildhall, London EC2P 2EJ

Application for Planning Permission

Town and Country Planning Act 1990 (as amended)

Publication of applications on planning authority websites

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

Site Location

Disclaimer: We can only make recommendations based on the answers given in the questions.

If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site - for example "field to the North of the Post Office".

Number: 55

Suffix:

Property Name:

Address Line 1: Fleet Street

Address Line 2:

Address Line 3: City Of London

Town/city: London

Postcode: EC4Y 1JU

Description of site location must be completed if postcode is not known:

Easting (x): 531345

Northing (y): 181159

Description:

Applicant Details

Name/Company

Title

First name

Surname

Astro Property Ltd

Company Name

Address

Address line 1

55 Fleet Street

Address line 2

Address line 3

Town/City

London

County

City Of London

Country

Postcode

EC4Y 1JU

Are you an agent acting on behalf of the applicant?

- ☑ Yes
- ○ No

Contact Details

Primary number

Secondary number

Fax number

Email address

Agent Details

Name/Company

Title

Mr

First name

Barry

Surname

Cunningham

Company Name

Address

Address line 1

140 Weston Road

Address line 2

Aston Clinton

Address line 3

Town/City

Aylesbury

County

Country

United Kingdom

Postcode

HP22 5EP

Contact Details

Primary number

***** REDACTED ******

Secondary number

Fax number

Email address

***** REDACTED ******

Site Area

What is the measurement of the site area? (numeric characters only).

89.00

Unit

Sq. metres

Site information

Please note: This question is specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999. View more information on the collection of this additional data and assistance with providing an accurate response.

Title number(s)

Please add the title number(s) for the existing building(s) on the site. If the site has no title numbers, please enter "Unregistered".

Title Number:
LN00000

Energy Performance Certificate Number

Do any of the buildings on the application site have an Energy Performance Certificate (EPC)?

◯ Yes
⊘ No

Public/Private Ownership

What is the current ownership status of the site?

◯ Public
⊘ Private
◯ Mixed

Description of the Proposal

Please note in regard to:

- **Fire Statements** - From 1 August 2021, planning applications for buildings of over 18 metres (or 7 stories) tall containing more than one dwelling will require a 'Fire Statement' for the application to be considered valid. There are some exemptions. View government planning guidance on fire statements or access the fire statement template and guidance.
- **Permission In Principle** - If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.
- **Public Service Infrastructure** - From 1 August 2021, applications for certain public service infrastructure developments will be eligible for faster determination timeframes. See help for further details or view government planning guidance on determination periods.

Description

Please describe details of the proposed development or works including any change of use

Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC)

Has the work or change of use already started?

◯ Yes
⊘ No

Further information about the Proposed Development

Please note: This question is specific to applications within the Greater London area.
The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999. View more information on the collection of this additional data and assistance with providing an accurate response.

Are the proposals eligible for the 'Fast Track Route' based on the affordable housing threshold and other criteria?

◯ Yes
⊘ No

Do the proposals cover the whole existing building(s)?

◯ Yes
⊘ No

Where proposals only affect part(s) of building(s), please provide details (e.g. 'Rear Ground Floor', 'Unit 1 - 1st-3rd Floor')

Ground Floor & Basement

Current lead Registered Social Landlord (RSL)

If the proposal includes affordable housing, has a Registered Social Landlord been confirmed?
If the proposal does not include affordable housing, select 'No'.

◯ Yes
⊘ No

Details of building(s)

Does the proposal include any new building and/or an increase in height to an existing building?

◯ Yes
⊘ No

Loss of garden land

Will the proposal result in the loss of any residential garden land?

◯ Yes
⊘ No

Projected cost of works

Please provide the estimated total cost of the proposal

Up to £2m

Vacant Building Credit

Please note: This question is specific to applications within the Greater London area.
The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.
View more information on the collection of this additional data and assistance with providing an accurate response.

Does the proposed development qualify for the vacant building credit?

◯ Yes
⊘ No

Superseded consents

Please note: This question is specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.
View more information on the collection of this additional data and assistance with providing an accurate response.

Does this proposal supersede any existing consent(s)?

◯ Yes
⊘ No

Development Dates

Please note: This question is specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.
View more information on the collection of this additional data and assistance with providing an accurate response.

Please add the expected commencement and completion dates for all phases of the proposed development. If the entire development is to be completed in a single phase, state in the 'Phase Detail' that it covers the 'Entire Development'.

Phase Detail:
Entire Development

When are the building works expected to commence?:
10/2024

When are the building works expected to be complete?:
04/2025

Scheme and Developer Information

Please note: This question is specific to applications within the Greater London area.
The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Scheme Name

Does the scheme have a name?

◯ Yes
⊘ No

Developer Information

Has a lead developer been assigned?

◯ Yes
⊘ No

Existing Use

Please describe the current use of the site

Vacant Offices

Is the site currently vacant?

⊘ Yes
◯ No

If Yes, please describe the last use of the site

Offices

When did this use end (if known)?

dd/mm/yyyy

Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.

Land which is known to be contaminated

◯ Yes
⊘ No

Land where contamination is suspected for all or part of the site

◯ Yes
⊘ No

A proposed use that would be particularly vulnerable to the presence of contamination

◯ Yes
⊘ No

Existing and Proposed Uses

Please note: This question contains additional requirements specific to applications within the Greater London area.
The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999. View more information on the collection of this additional data and assistance with providing an accurate response.

Please add details of the Gross Internal Area (GIA) for all current uses and how this will change based on the proposed development. Details of the floor area for any proposed new uses should also be added.

Use Class:
E(g)(i) - Offices - Except where not suitable in a residential area

Existing gross internal floor area (square metres):
80.5

Gross internal floor area lost (including by change of use) (square metres):
80.5

Gross internal floor area gained (including change of use) (square metres):
80.5

Total	Existing gross internal floorspace (square metres)	Gross internal floor area lost (including by change of use) (square metres)	Gross internal floor area gained (including change of use) (square metres)
	80.5	80.5	80.5

Materials

Does the proposed development require any materials to be used externally?

◯ Yes
⊘ No

Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway?

◯ Yes
⊘ No

Is a new or altered pedestrian access proposed to or from the public highway?

◯ Yes
⊘ No

Are there any new public roads to be provided within the site?

◯ Yes
⊘ No

Are there any new public rights of way to be provided within or adjacent to the site?

◯ Yes
⊘ No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?

◯ Yes
⊘ No

Vehicle Parking

Please note: This question contains additional requirements specific to applications within Greater London.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Does the site have any existing vehicle/cycle parking spaces or will the proposed development add/remove any parking spaces?

◯ Yes
⊘ No

Electric vehicle charging points

Please note: This question is specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Do the proposals include electric vehicle charging points and/or hydrogen refuelling facilities?

◯ Yes
⊘ No

Trees and Hedges

Are there trees or hedges on the proposed development site?

◯ Yes
⊘ No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

◯ Yes
⊘ No

If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of the local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside the application. The local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

Assessment of Flood Risk

Is the site within an area at risk of flooding? (Check the location on the Government's Flood map for planning. You should also refer to national standing advice and your local planning authority requirements for information as necessary.)

◯ Yes
⊘ No

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

◯ Yes
⊘ No

Will the proposal increase the flood risk elsewhere?

◯ Yes
⊘ No

How will surface water be disposed of?

☐ Sustainable drainage system

☐ Existing water course

☐ Soakaway

☑ Main sewer

☐ Pond/lake

Biodiversity and Geological Conservation

Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?

To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.

a) Protected and priority species

◯ Yes, on the development site
◯ Yes, on land adjacent to or near the proposed development
⊘ No

b) Designated sites, important habitats or other biodiversity features

◯ Yes, on the development site
◯ Yes, on land adjacent to or near the proposed development
⊘ No

c) Features of geological conservation importance

◯ Yes, on the development site
◯ Yes, on land adjacent to or near the proposed development
⊘ No

Supporting information requirements

Where a development proposal is likely to affect features of biodiversity or geological conservation interest, you will need to submit, with the application, sufficient information and assessments to allow the local planning authority to determine the proposal.

Failure to submit all information required will result in your application being deemed invalid. It will not be considered valid until all information required by the local planning authority has been submitted.

Your local planning authority will be able to advise on the content of any assessments that may be required.

Biodiversity net gain

Biodiversity net gain is a legal requirement for planning permission introduced on 12 February 2024. All applications are required to either provide detailed information proving there will be a biodiversity increase; or explain why they are exempt from doing so.

Find out more about biodiversity net gain, and access digital tools from our partners that can help determine if you are exempt, or produce the biodiversity metric information required.

Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended)) would apply?

◯ Yes
⊘ No

Please add all the exemptions or transitional arrangements that apply and provide a reason why

Exemption:
Development subject to the de minimis exemption (development below the threshold)

Reason for selecting exemption:
Internal works for change of use only

Note: Please read the help text for further information on the exemptions available and when they apply

Open and Protected Space

Please note: This question is specific to applications within Greater London.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Open Space

Will the proposed development result in the loss, gain or change of use of any open space?

- ◯ Yes
- ⊘ No

Protected Space

Will the proposed development result in the loss, gain or change of use of a site protected with a nature designation?

- ◯ Yes
- ⊘ No

Foul Sewage

Please state how foul sewage is to be disposed of:

- ☑ Mains sewer
- ☐ Septic tank
- ☐ Package treatment plant
- ☐ Cess pit
- ☐ Other
- ☐ Unknown

Are you proposing to connect to the existing drainage system?

- ◯ Yes
- ◯ No
- ⊘ Unknown

Water management

Please note: This question is specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.
View more information on the collection of this additional data and assistance with providing an accurate response.

Please state the expected percentage reduction of surface water discharge (for a 1 in 100-year rainfall event) from the proposal

0	percent

Are Green Sustainable Drainage Systems (SuDS) incorporated into the drainage design for the proposal?

◯ Yes
⊘ No

Please state the expected internal residential water usage of the proposal

0.00	litres per person per day

Does the proposal include the harvesting of rainfall?

◯ Yes
⊘ No

Does the proposal include re-use of grey water?

◯ Yes
⊘ No

Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste?

◯ Yes
⊘ No

Residential Units

Please notes: This question contains additional requirements specific to applications within Greater London.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Residential Units to be lost

Does this proposal involve the loss or replacement of any self-contained residential units or student accommodation (including those being rebuilt)?

◯ Yes
⊘ No

Residential Units to be added

Does this proposal involve the addition of any self-contained residential units or student accommodation (including those being rebuilt)?

◯ Yes
⊘ No

Mixed use residential site area

Is this application for a mixed use proposal that includes residential uses?

◯ Yes
⊘ No

Non-Permanent Dwellings

Please note: This question is specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Does this proposal involve the loss or gain of any non-permanent dwellings? Note that this covers any non-permanent dwellings if used as main residence (e.g. caravans, mobile homes, converted railway carriages), traveller pitches/plots or houseboat moorings.

◯ Yes
⊘ No

Other Residential Accommodation

Please note: This question contains additional requirements specific to applications within the Greater London area.
The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.
View more information on the collection of this additional data and assistance with providing an accurate response.

Does this proposal involve the loss or gain of any other residential accommodation? Note that this covers all other permanent residential accommodation that is outside of Use Classes C3 and C4 (apart from student accommodation), including rooms that are specifically provided for older persons.

◯ Yes
⊘ No

Waste and recycling provision

Please note: This question contains additional requirements specific to applications within the Greater London area. The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Does every unit in this proposal (residential and non-residential) have dedicated internal and external storage space for dry recycling, food waste and residual waste?

⊘ Yes
◯ No

Utilites

Please note: This question contains additional requirements specific to applications within the Greater London area.

The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.

View more information on the collection of this additional data and assistance with providing an accurate response.

Water and gas connections

Number of new water connections required

0

Number of new gas connections required

0

Fire safety

Is a fire suppression system proposed?

◯ Yes
⊘ No

Internet connections

Number of residential units to be served by full fibre internet connections

0

Number of non-residential units to be served by full fibre internet connections

1

Mobile networks

Has consultation with mobile network operators been carried out?

◯ Yes
⊘ No

Environmental Impacts

Please note: This question is specific to applications within the Greater London area.
The Mayor can request relevant information about spatial planning in Greater London under Section 346 of the Greater London Authority Act 1999.
View more information on the collection of this additional data and assistance with providing an accurate response.

Community energy

Will the proposal provide any on-site community-owned energy generation?

◯ Yes
⊘ No

Heat pumps

Will the proposal provide any heat pumps?

◯ Yes
⊘ No

Solar energy

Does the proposal include solar energy of any kind?

◯ Yes
⊘ No

Passive cooling units

Number of proposed residential units with passive cooling

0

Emissions

NOx total annual emissions (Kilograms)

0.00

Particulate matter (PM) total annual emissions (Kilograms)

0.00

Greenhouse gas emission reductions

Are the on-site Green House Gas emission reductions at least 35% above those set out in Part L of Building Regulations 2021?

◯ Yes
⊘ No

Green Roof

Proposed area of 'Green Roof' to be added (Square metres)

0.00

Urban Greening Factor

Please enter the Urban Greening Factor score

0.00

Residential units with electrical heating

Number of proposed residential units with electrical heating

0

Reused/Recycled materials

Percentage of demolition/construction material to be reused/recycled

50

Employment

Are there any existing employees on the site or will the proposed development increase or decrease the number of employees?

- [x] Yes
- [ ] No

Existing Employees

Please complete the following information regarding existing employees:

Full-time

0

Part-time

0

Total full-time equivalent

0.00

Proposed Employees

If known, please complete the following information regarding proposed employees:

Full-time

8

Part-time

Total full-time equivalent

Hours of Opening

Are Hours of Opening relevant to this proposal?

- [x] Yes
- [ ] No

Please add details of the of the Use Classes and hours of opening for each non-residential use proposed.

If you do not know the hours of opening, select the Use Class and tick 'Unknown'

Use Class:
Other (Please specify)

Other (Please specify):
Sui Generis

Unknown:
No

Monday to Friday:

Start Time:
00:00

End Time:
00:00

Saturday:

Start Time:
00:00

End Time:
00:00

Sunday / Bank Holiday:

Start Time:
00:00

End Time:
00:00

Industrial or Commercial Processes and Machinery

Does this proposal involve the carrying out of industrial or commercial activities and processes?

- [ ] Yes
- [x] No

Is the proposal for a waste management development?

- [ ] Yes
- [x] No

Hazardous Substances

Does the proposal involve the use or storage of Hazardous Substances?

- [ ] Yes
- [x] No

Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

- [x] Yes
- [ ] No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- [x] The agent
- [ ] The applicant
- [ ] Other person

Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

- [ ] Yes
- [x] No

Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:
(a) a member of staff
(b) an elected member
(c) related to a member of staff
(d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

- [ ] Yes
- [x] No

Ownership Certificates and Agricultural Land Declaration

Certificates under Article 14 - Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

Please answer the following questions to determine which Certificate of Ownership you need to complete: A, B, C or D.

Is the applicant the sole owner of all the land to which this application relates; and has the applicant been the sole owner for more than 21 days?

- [ ] Yes
- [x] No

Can you give appropriate notice to all the other owners/agricultural tenants? (Select 'Yes' if there are no other owners/agricultural tenants)

- [x] Yes
- [ ] No

Certificate Of Ownership - Certificate B

I certify/ The applicant certifies that:

☑ **I have/The applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner* and/or agricultural tenant** of any part of the land or building to which this application relates; or**

○ **The applicant is the sole owner of all the land or buildings to which this application relates and there are no other owners* and/or agricultural tenants**.**

*** "owner" is a person with a freehold interest or leasehold interest with at least 7 years left to run.**

**** "agricultural tenant" has the meaning given in section 65(8) of the Town and Country Planning Act 1990**

Owner/Agricultural Tenant

Name of Owner/Agricultural Tenant:
***** REDACTED ******

House name:

Number:
15

Suffix:

Address line 1:
Granville Road

Address Line 2:

Town/City:
Hayes

Postcode:
UB3 4PL

Date notice served (DD/MM/YYYY):
20/02/2024

Person Family Name:

Person Role

☑ The Applicant
○ The Agent

Title

First Name

Surname

Astro Property Ltd

Declaration Date

07/06/2024

☑ Declaration made

Declaration

I/We hereby apply for Full planning permission as described in the questions answered, details provided, and the accompanying plans/drawings and additional information.
I/We confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.
I/We also accept that, in accordance with the Planning Portal's terms and conditions:
- Once submitted, this information will be made available to the Local Planning Authority and, once validated by them, be published as part of a public register and on the authority's website;
- Our system will automatically generate and send you emails in regard to the submission of this application.

☑ I / We agree to the outlined declaration

Signed

Barry Cunningham

Date

18/06/2024

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This form should be saved to your device and then completed using the free Adobe Acrobat Reader application or full version of Adobe Acrobat. Many internet browsers and other applications can display PDF files, but we cannot guarantee their compatibility in regard to these forms. We specifically advise users of Apple devices not to use 'Preview' because of known issues.

Community Infrastructure Levy (CIL) - Form 1: CIL Additional Information

Determining whether a Development may be CIL Liable - For submission with Planning Application

Please note: This version of the form should only be used for submissions relating to planning applications in England.
There is a legacy version of the form for use in Wales: Download the legacy version of this form

Following the introduction of the Community Infrastructure Levy (CIL) all applicants for full planning permission, including householder applications and reserved matters following an outline planning permission, and applicants for lawful development certificates are required to provide the following information.

Please read the associated Guidance Note before you complete the form. This and additional per-question help can be viewed at:
https://ecab.planningportal.co.uk/uploads/1app/cil_guidance.pdf

Please complete the form using block capitals and black ink and send to the Collecting Authority.

See Planning Practice Guidance for CIL for guidance on CIL generally, including exemption or relief.

Privacy Notice

This form is provided by Planning Portal and based on the requirements provided by Government for the sole purpose of submitting information to a Local Authority in accordance with the 'The Community Infrastructure Levy Regulations 2010 (as amended)'.

Please be aware that once you have downloaded this form, Planning Portal will have no access to the form or the data you enter into it (unless you choose to upload it to any Planning Portal online service in agreement with the relevant terms and conditions). Any subsequent use of this form is solely at your discretion, including the choice to complete and submit it to a Local Authority with the declaration section.

Upon receipt of this form and any supporting information, it is the responsibility of the Local Authority to inform you of its obligations in regards to the processing of this information. Please refer to its website for further information on any legal, regulatory and commercial requirements relating to information security and data protection of the information you have provided.

1. Application Details

Applicant or Agent Name:

BARRY CUNNINGHAM

Planning Portal Reference (if applicable):

Local authority planning application number (if allocated):

Site Address:

55 FLEET STREET, LONDON, EC4Y 1JU

Description of development:

Change of Use from vacant office use on part basement and ground floors to an Adult Gaming Centre (AGC)

2. Applications to Remove or Vary Conditions on an Existing Planning Permission

a) Does the application seek to remove or vary conditions on an existing planning permission (i.e. Is it a Section 73 application)?

Yes
If 'Yes', please complete the rest of this question ☐

No
If 'No', you can skip to **Question 3** ☒

b) Please enter the application reference number

c) Does the application involve a change in the amount or use of new build development, where the total (including that previously granted planning permission) is over 100 square metres gross internal area?

Yes ☐ No ☐

d) Does the application involve a change in the amount of gross internal area where one or more new dwellings (including residential annexes) are to be created, either through new build or conversion (except the conversion of a single dwelling house into two or more separate dwellings with no additional gross internal area created)?

Yes ☐ No ☐

If you answered 'Yes' to either c) or d), please go to **Question 5**

If you answered 'No' to both c) and d), you can skip to **Question 8**

3. Reserved Matters Applications

a) Does the application relate to details or reserved matters on an existing permission that was granted prior to the introduction of the CIL charge in the relevant local authority area?

Yes
If 'Yes', please complete the rest of this question ☐

No
If 'No', you can skip to **Question 4** ☒

b) Please enter the application reference number

If you answered 'Yes' to a), you can skip to **Question 8**

If you answered 'No' to a), please go to **Question 4**

4. Liability for CIL

a) Does the application include new build development (including extensions and replacement) of 100 square metres gross internal area or above?

Yes ☐ No ☒

b) Does the application include creation of one or more new dwellings (including residential annexes) either through new build or conversion (except the conversion of a single dwelling house into two or more separate dwellings with no additional gross internal area created)?

Yes ☐ No ☒

If you answered 'Yes' to either a) or b), please go to **Question 5**

If you answered 'No' to both a) and b), you can skip to **Question 8**

5. Exemption or Relief

a) Is the site owned by a charity where the development will be wholly or mainly for charitable purposes, and the development will be either occupied by or under the control of a charitable institution?

Yes ☐ No ☐

b) Does the proposed development include affordable housing which qualifies for mandatory or discretionary Social Housing relief?

Yes ☐ No ☐

If you answered 'Yes' to either a) or b), please note that you will need to complete 'CIL Form 10: Charitable and/or Social Housing Relief Claim'. The form must be submitted to the Collecting Authority, **and** any relief must be granted by them, prior to the commencement of the development. Otherwise the full CIL charge will be payable.

A Commencement (of development) Notice (CIL Form 6) must also be received by the Collecting Authority prior to the commencement of the development otherwise:

- *If your CIL Liability Notice was issued on or after 1 September 2019*
  A surcharge equal to 20% of the notional CIL chargeable amount or £2,500, whichever is the lower amount, will be incurred; **or**
- *If your CIL Liability Notice was issued prior to 1 September 2019*
  The relief previously granted will be rescinded and the full levy charge will be payable.

You will also need to complete 'CIL Form 10: Charitable and/or Social Housing Relief Claim' if you think you are eligible for discretionary charitable relief, or discretionary social housing relief (if this is available in your area).

If you wish to claim exceptional circumstances relief, and if the charging authority have made exceptional circumstances relief available in their area (please check their website for details), you will need to complete 'CIL Form 11: Exceptional Circumstances Relief Claim'. The form must be submitted to the Collecting Authority, AND any relief must be granted by them, prior to the commencement of the development. Otherwise the full CIL charge will be payable.

All CIL Forms are available from: www.planningportal.co.uk/cil

c) Do you wish to claim a self build exemption for a whole new home?

Yes ☐ No ☐

If you have answered 'Yes' to c), please note that you will need to complete 'CIL Form 7: Self Build Exemption Claim - Part 1'. This form must be submitted to the Collecting Authority, **and** any exemption must be granted by them, prior to the commencement of the development. Otherwise the full CIL charge will be payable.

A Commencement (of development) Notice (CIL Form 6) must also be received by the Collecting Authority prior to the commencement of the development otherwise:

- *If your CIL Liability Notice was issued on or after 1 September 2019*
  A surcharge equal to 20% of the notional CIL chargeable amount or £2,500, whichever is the lower amount, will be incurred; **or**
- *If your CIL Liability Notice was issued prior to 1 September 2019*
  The exemption previously granted will be rescinded and the full levy charge will be payable.

All CIL Forms are available from: www.planningportal.co.uk/cil

d) Do you wish to claim an exemption for a residential annex or extension?

Yes ☐ No ☐

If you have answered 'Yes' to d), please note that you will need to complete either 'CIL Form 8: Residential Annex Exemption Claim' or 'CIL Form 9: Residential Extension Exemption Claim'. The relevant form must be submitted to the Collecting Authority, **and** any exemption must be granted by them, prior to the commencement of the development. Otherwise the full CIL charge will be payable.

In respect of a residential annex, a Commencement (of development) Notice (CIL Form 6) must also be received by the Collecting Authority prior to the commencement of the development otherwise:

- *If your CIL Liability Notice was issued on or after 1 September 2019*
  A surcharge equal to 20% of the notional CIL chargeable amount or £2,500, whichever is the lower amount, will be incurred; **or**
- *If your CIL Liability Notice was issued prior to 1 September 2019*
  The exemption previously granted will be rescinded and the full levy charge will be payable.

All CIL Forms are available from: www.planningportal.co.uk/cil

6. Proposed New Gross Internal Area

a) Does the application involve new **residential development** (including new dwellings, extensions, conversions/changes of use, garages, basements or any other buildings ancillary to residential use)?

Please note, conversion of a single dwelling house into two or more separate dwellings (without extending them) is **not** liable for CIL. If this is the sole purpose of your development proposal, you should answer 'No' to Question 4b above.

Yes ☐ No ☐

If yes, please complete the table in section 6c below, providing the requested information, including the gross internal area relating to new dwellings, extensions, conversions, garages or any other buildings ancillary to residential use.

b) Does the application involve new **non-residential development**?

Yes ☐ No ☐

If yes, please complete the table in section 6c below, using the information from your planning application.

c) Proposed gross internal area:

Development type	(i) Existing gross internal area (square metres)	(ii) Gross internal area to be lost by change of use or demolition (square metres)	(iii) Total gross internal area proposed (including change of use, basements, and ancillary buildings) (square metres)	(iv)Net additional gross internal area following development (square metres) (iv) = (iii) - (ii)
Market Housing (if known)				
Social Housing, including shared ownership housing (if known)				
Total residential				
Total non-residential				
Grand total				

7. Existing Buildings

a) How many existing buildings on the site will be retained, demolished or partially demolished as part of the development proposed?

Number of buildings:

b) Please state for each existing building/part of an existing building that is to be retained or demolished, the gross internal area that is to be retained and/or demolished and whether all or part of each building has been in use for a continuous period of at least six months within the past thirty six months. Any existing buildings into which people do not usually go or only go into intermittently for the purposes of inspecting or maintaining plant or machinery, or which were granted temporary planning permission should not be included here, but should be included in the table in section 7c.

	Brief description of existing building/part of existing building to be retained or demolished.	Gross internal area (sqm) to be retained.	Proposed use of retained gross internal area.	Gross internal area (sqm) to be demolished.	Was the building or part of the building occupied for its lawful use for 6 continuous months of the 36 previous months (excluding temporary permissions)?		When was the building last occupied for its lawful use? Please enter the date (dd/mm/yyyy) or tick still in use.
1					Yes ☐	No ☐	Date: or Still in use: ☐
2					Yes ☐	No ☐	Date: or Still in use: ☐
3					Yes ☐	No ☐	Date: or Still in use: ☐
4					Yes ☐	No ☐	Date: or Still in use: ☐
	Total floorspace						

7. Existing Buildings (continued)

c) Does the development proposal include the retention, demolition or partial demolition of any whole buildings **which people do not usually go into or only go into intermittently for the purposes of inspecting or maintaining plant or machinery, or which were granted planning permission for a temporary period**?

Yes ☐ No ☐

If yes, please complete the following table:

	Brief description of existing building (as per above description) to be retained or demolished.	Gross internal area (sqm) to be retained	Proposed use of retained gross internal area	Gross internal area (sqm) to be demolished
1				
2				
3				
4				
Total of which people do not normally go into, only go intermittently to inspect or maintain plant or machinery, or which was granted temporary planning permission				

d) If the development proposal involves the conversion of an existing building, will it be creating a new mezzanine floor within the existing building?

Yes ☐ No ☐

If Yes, how much of the gross internal area proposed will be created by the mezzanine floor?

Use	Mezzanine gross internal area (sqm)

8. Declaration

I/we confirm that the details given are correct.

Name:

BARRY CUNNINGHAM

Date (DD/MM/YYYY). Date cannot be pre-application:

18/06/2024

It is an offence for a person to knowingly or recklessly supply information which is false or misleading in a material respect to a collecting or charging authority in response to a requirement under the Community Infrastructure Levy Regulations (2010) as amended (regulation 110, SI 2010/948). A person guilty of an offence under this regulation may face unlimited fines, two years imprisonment, or both.

For local authority use only

Application reference:

55, Fleet Street, London, EC4Y 1JU

Change of Use from vacant office use on part basement and ground floors to an Adult Gaming Centre (AGC)

1. The site

This is located on the south side of Fleet Street which is numbered sequentially . Facing the site from Fleet Street No 56 is to the left and 54 to the right of the subject the property. A separate planning application is to be made concerning the ground floor and basement

The gross site area is 89sqm.
This is a consequence of both Fleet Street and that part of Lombard Street now called Pleydell Court being ancient highways with the subsoil of these highways remaining in the ownership of the frontagers in accord the principle of *ad medium filum*. Whilst outwith the application it is noted that the full basement extends under Fleet Street to approximately the kerb line and under Pleydell Court.

2. The building

From records available it is possible that the present building , on all six levels, was erected in 1886 oversailing Pleydell Court. With distinctive white glazed bricks to both parts of the external elevations to Pleydell Court and within parts of the basement. The building suffered from war damage, which was made good in 1948/9 with the construction of a replacement internal staircase to all levels (City of London planning ref 1603). It is likely that at this time the present Crittall window frames were installed to all elevations. It was last used on all levels for a firm of solicitors before falling vacant in 2022.

3 The proposal

To change the use of part of the vacant office basement and the ground floor to an Adult Gaming Centre. The basement to be used by staff and for storage associated with the primary use and the ground floor for the AGC with the public access from Fleet Street. As shown on the plan as proposed a window display is to be installed facing Fleet Street and part of the return frontage.

The existing internal staircase is to be used to move from ground floor to basement. This is controlled by the applicant and is shown edged blue.

4 The Development Plan

This comprises The London Plan 2021 and the City of London Plan 2015. There is an emerging new City of London (CoL) Plan 2040 but given the first draft was published in November 2023 and the plan has yet to be examined, no weight is given to its policies.

The CoL Plan designates Fleet Street as a principle shopping street in the key diagram. But the policies CS 20 and DM20.1 have been rendered out of date to a significant extent by the introduction of Use Class E. Whilst the proposed use is *sui generis* it does not represent the loss of retail floorspace given the previous use. And it will assist in maintaining the viability and vitality of this shopping street.

The site is outside of Flood Zones 2 and 3 and the City Flood Risk area as shown in the 2015 plan.

Noise attenuation measures are to be installed to the soffit of the first floor to ensure that the proposed use does not disturb those above should a separate application for residential use be granted by the Local Planning Authority.

5 The National Planning Policy Framework (NPPF)

Paragraph 90 advises *Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:*

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;

d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;

e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

The proposed window display area to Fleet Street and the footfall generated by the proposed use will help maintain the vitality of Fleet Street as a principle shopping street. The proposal helps deliver sub sections a and d of this paragraph of the NPPF. By installing noise attenuation measures to the soffit of the first floor, the delivery of sub paragraph f is also enabled.

Material Considerations

A vacant frontage detracts from the principle shopping street. And the premises have been occupied twice by squatters in 2024 who were removed with the assistance of the City of London Police.

hepworth acoustics

PROPOSED GOLDEN SLOTS PREMISES, 55 FLEET STREET, LONDON EC4Y 1JU

NOISE ASSESSMENT

On behalf of:

Equity First Holdings Ltd

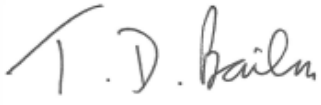
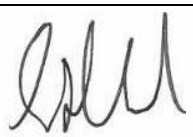
Report Number P24-075-R01
June 2024

PROPOSED GOLDEN SLOTS PREMISES, 55 FLEET STREET, LONDON EC4Y 1JU

NOISE ASSESSMENT

Report prepared by:
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On behalf of:
Equity First Holdings Ltd

Report prepared by: Thomas Bailess MEng MIOA – Principal Consultant	
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1.0 INTRODUCTION

1.1 Hepworth Acoustics Ltd has been commissioned by Equity First Holdings Ltd to carry out a noise assessment in connection with a proposed Adult Gaming Centre (AGC) development in the existing basement and ground floor unit at 55 Fleet Street, London EC4Y 1JU. The site location is shown in Figure 1.

1.2 This assessment has been requested in connection with a planning application for the development. Currently the unit is vacant. The applicant proposes to convert this to an Adult Gaming Centre, which will include slot machines and other electronic gaming machines. We understand that the applicant proposes opening to customers for 24 hours a day, 7 days a week.

1.3 The site is on the corner of Fleet Street and Pleydell Court. There are residences on the opposite side of Fleet Street, around 20 metres away based our survey on site. To the rear are offices and, further south along Lombard Lane, a hotel (Temple Court Apex Hotel). There are retail units on either side.

1.4 There is an existing commercial office on the first floor of the building, currently vacant, directly above the ground floor trading premises. There is a proposal to convert this into a residence.

1.5 The gaming area of the proposed development will be on the ground floor of the building. The basement level of the premises will be used for WCs, storage, and staff facilities.

1.6 There are two existing condensers serving the climate control system for the premises. These are located externally, adjacent to the rear fire escape at first floor level. These were disconnected at the time of our inspection. We understand these will be retained.

1.7 This assessment has included the following:

- A site inspection;
- A survey of the prevailing environmental noise levels at the site;
- Measurement of indoor activity noise at a similar AGC to use as reference noise levels;
- Specification of the sound insulation performance of the separating construction between the ground and first floors;
- Assessment of mechanical plant noise;

- Assessment of noise impact on nearby noise-sensitive premises.

1.8 This assessment is based on the following drawings prepared by Colneside Building Design, dated 16th May 2024:

- 55FltStAGC-FUL-24-01
- 55FltStAGC-FUL-24-02
- 55FltStAGC-FUL-24-03
- 55FltStSCU-Pri-24-01
- 55FltStSCU-Pri-24-02
- 55FltStSCU-Pri-24-03
- 55FltStSCU-Pri-24-04

1.9 All recommendations in this report are given for acoustics reasons only. Compliance with other requirements (e.g. fire, structural, thermal, etc.) must be checked by others.

1.10 The various noise units and indices referred to in this report are described in Appendix I. All noise levels mentioned in the text have been rounded to the nearest decibel, as fractions of decibels are imperceptible.

2.0 ACOUSTIC DESIGN CRITERIA

2.1 The *National Planning Policy Framework* (NPPF), December 2023, provides some general guidance to local authorities on taking noise into account in planning policies and decisions. NPPF paragraph 191, a) states that planning policies and decisions should *"mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life"*.

2.2 Policy D14 of the London Plan, dated March 2021, includes the following guidance on noise, which has been followed in this assessment:

"In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

1) avoiding significant adverse noise impacts on health and quality of life

2) reflecting the Agent of Change principle

3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses

4) improving and enhancing the acoustic environment and promoting appropriate soundscapes

5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation

6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles

7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver."

2.3 We understand that the Local Planning Authority, City of London Corporation, encourages the use of British Standard 8233: 2014 *Guidance on sound insulation and noise reduction for buildings*, as does the London Plan. This is referred to as BS 8233 hereon. For the internal noise design limits for the proposed first-floor residences, we have referred to the guidance in this standard.

2.4 BS 8233 recommends guidance on design criteria for acceptable noise levels within residential accommodation. BS 8233 guidelines for the daytime (07:00 – 23:00) and night-time (23:00 – 07:00) periods are summarised in Table 1.

Table 1: BS 8233 recommended acoustic design criteria

Activity	Location	Internal Noise Levels	
		Daytime 07:00 – 23:00	Night-time 23:00 – 07:00
Resting	Living room	35 dB $L_{Aeq,16hr}$	-
Dining	Dining room / area	40 dB $L_{Aeq,16hr}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16hr}$	30 dB $L_{Aeq,8hr}$

2.5 BS 8233 clarifies that the above guidance relates only to noise without 'specific character' (e.g. such as that which has a distinguishable, discrete and continuous tone, is irregular enough to attract attention, or has strong low-frequency content) and that where such characteristics are present, lower noise limits might be appropriate.

2.6 The type of noise associated with the proposed gaming machines has 'specific character'. To account for this, we recommend that any noise intrusion from the ground floor trading area to any residences should be controlled to be within NR 20 for living rooms during the daytime, and NR 15 for bedrooms at night, measured using the L_{eq} metric. These are equivalent to no more than around 28 dB L_{Aeq} and 23 dB $L_{Aeq,}$ respectively, and are therefore well within the BS 8233 design limits stated in Table 1.

2.7 BS 8233 also recognises that regular individual noise events at night can cause sleep disturbance. Peaks of noise from individual events are usually described in terms of L_{Amax} values and these can be highly variable and unpredictable. Research described in WHO *Community Noise Guidelines* states, "*for a good sleep, it is believed that indoor sound pressure levels should not exceed approximately 45 dB* L_{Amax} *more than 10-15 times per night*". That threshold is therefore 22 dB(A) above the night-time L_{Aeq} criterion value as stated above.

2.8 For external plant, we understand that the Local Authority does not apply specific noise criteria, but recommends assessing noise impact using the guidance in British Standard 4142. The latest version is BS 4142: 2014 + A1: 2019 '*Methods for rating and assessing industrial and commercial sound'.* This provides methods for rating and assessing sound of an industrial and/or commercial nature. The standard will be referred to as BS 4142 for the rest of this report for brevity.

2.9 BS 4142 requires the 'rating' noise level for the operation to be compared with the background (L_{A90}) noise level in the absence of the operational noise being assessed.

2.10 The 'rating' level is derived based on the 'specific' L_{Aeq} noise level attributable to the operation with an *'acoustic feature'* penalty added for any noise sources which give rise to tonal, impulsive, intermittent, or other characteristics readily distinctive against the residual acoustic environment.

2.11 An initial estimate of the impact of the operation is determined by subtracting the background level from the rating level. BS 4142 states that:

- Typically, the greater this difference, the greater the magnitude of the impact
- A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context
- A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context

2.12 The lower the rating level is relative to the measured background level, the less likely it is that the operation will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

3.0 NOISE SURVEYS

Environmental Noise

3.1 Environmental noise measurements were carried out at the site to determine the prevailing ambient noise levels of the area. Noise levels were measured at Location 1 on the pavement in front of the building, and at Location 2 outside the hotel to the rear. The locations are marked on Figure 1.

3.2 Attended noise measurements were taken on Thursday 16th May between 01:00 and 03:00 to represent typical night-time conditions and between 13.00 and 15.00 the same day to represent typical daytime conditions. Measurements were taken simultaneously at Locations 1 and 2. Measurements were taken in sequential 15-minute samples at both locations.

3.3 The measurement microphones at Locations 1 and 2 were mounted on tripods, around 1.5 metres above local ground level.

3.4 The weather conditions throughout the noise survey were mild, dry, and overcast, with wind speeds below 5 m/s. Wind was from the southwest. These were considered suitable conditions for the survey.

3.5 The results of the noise survey are detailed in Appendix II. The measured noise levels are summarised in Table 2. The L_{Aeq} and L_{A90} values in Table 2 are the logarithmic and arithmetic average respectively of the samples at each location for the relevant time period.

Table 2: Environmental noise levels summary (dBA)

Location	Time	Noise level		
		$L_{Amax,f}$	$L_{Aeq,T}$	$L_{A90,T}$
1	Daytime	78 – 83	71	60
	Night-time	68 – 74	64	51
2	Daytime	77 – 82	57	50
	Night-time	69 – 78	53	45

3.6 The dominant noise source at Location 1 was road traffic noise on Fleet Street. The dominant noise sources at Location 2 were distant road traffic and mechanical plant associated with nearby commercial premises.

Reference Noise Levels

3.7 Noise measurements were taken inside an existing operational AGC at 3 Seven Sisters Road, London N7 6AJ from 18.45 to 19.45 on Thursday 29th November 2018. This time was selected following

consultation with staff to be representative of a typical busy period. This AGC is of a similar size to one proposed herein, and uses similar gaming machines, so this is considered to be equivalent with regards to trading noise. The results are shown in Appendix II and summarised in Table 3.

Table 3: Typical AGC internal trading noise levels (dB)

Description	Octave Band Centre Frequency (Hz)								A
	63	125	250	500	1k	2k	4k	8k	
L_{eq}	61	63	65	61	60	58	56	48	66
Typical L_{max}	89	85	83	81	79	74	79	69	85

3.8 Therefore, the trading noise is characterised by fairly modest average noise levels interspersed with occasional periods of more elevated peaks of noise.

Sound Level Meter Details

3.9 Noise measurements at Location 1 and inside the AGC at 3 Seven Sisters Road were carried out using a Brüel & Kjær Type 2250 sound level meter (serial no. 3011626).

3.10 Noise measurements at Location 2 were carried out using a NTi XL2-TA 'Class 1' sound level meter (serial no. A2A-20294-E0).

3.11 Both meters were fitted with windshields. Both meters have independent laboratory calibration certification valid for the date of all measurements.

3.12 The calibration levels of the meters were checked before and after the surveys with a Brüel & Kjær Type 4231 sound calibrator (serial no. 2412667). No significant calibration deviation was observed.

4.0 ASSESSMENT

Noise Break Out

4.1 We understand that the existing glazed frontage and glass entry door for the ground floor will be retained. We would expect this to provide an overall sound reduction comfortably in excess of 20 dB R_w.

4.2 Based on the reference trading noise levels shown in Table 4, and by taking typical values for the sound reduction indices (SRIs) equating to 20 dB R_w for a cautious assessment, as well as the area of the façade, the noise break-out levels at 20 metres have been calculated, as shown in Table 4.

Table 4: Predicted Noise Break-Out at 20 m from Frontage

	Octave Band Centre Frequency (Hz)								A
	63	125	250	500	1k	2k	4k	8k	
Trading Noise L_{eq}	61	63	65	61	60	58	56	48	66
Trading Noise L_{max}	89	85	83	81	79	74	79	69	85
Frontage SRI	12	15	20	25	25	23	20	20	
Noise Break-Out L_{eq}	29	28	25	16	15	15	16	8	**23**
Noise Break-Out L_{max}	57	50	43	36	34	31	39	29	**44**

4.3 To note, 20 metres is representative of the nearest noise-sensitive premises to the front, on the opposite side of Fleet Street.

4.4 Break out noise reflecting or refracting back to the proposed first-floor residences in 55 Fleet Street is not expected to be significant.

4.5 The predicted worst-case noise break-out levels are considerably lower than the corresponding baseline noise levels at Location 1, as set out in Table 2. Therefore, no adverse impacts due to break out of noise through the premises frontage are anticipated.

4.6 The rear of the building comprises an entrance lobby with a door onto Pleydell Court. We would expect this to provide sound reduction of at least 50 dB R_w. There are no hotel or residential windows overlooking the entrance lobby, or in the vicinity of the rear door, so no impact on residences is anticipated from this elevation.

Internal Sound Insulation

4.7 The building is to be refurbished, which includes converting the first floor office into a residence. This will necessitate reconstructing the separating floor between the ground and first floors.

4.8 Based on the reference trading noise levels shown in Table 3 and the recommended noise intrusion limits stated in Section 2, we recommend that the new separating floor is specified to achieve the sound insulation performance shown in Table 5 or greater.

Table 5: Separating floor recommended minimum sound insulation performance (dB)

Description	Octave Band Centre Frequency (Hz)							
	63	125	250	500	1k	2k	4k	8k
Sound reduction performance	32	38	45	47	52	56	58	61

4.9 The performance shown in Table 5 should be achievable using standard floor and ceiling constructions if flanking sound transmission is sufficiently controlled. We recommend that the proposed floor construction is reviewed at the next stage to confirm that the advised sound insulation performance can be achieved.

4.10 As general good practice, we recommend that the ceiling in the ground floor space is kept in good condition in future, repairing any gaps or holes that may occur, to ensure sound insulation performance is maintained.

4.11 We do not anticipate there to be potential for noise disturbance to or from the adjacent retail premises through the party walls.

External Plant Noise

4.12 The two existing outdoor condensers serving the ground floor unit are Fujitsu brand, model AOYG12LMCA. Each unit has a sound power level output of 61 dB L_w, according to the manufacturer's test data.

4.13 There will be hemi-spherical distance attenuation of 12 metres to the nearest habitable room window giving 30 dB(A) reduction. The formula used for hemi-spherical distance attenuation in this context is as follows:

$L_p = L_w - 20 \log r - 8$

Where:

L_p = sound pressure level (dB)

L_w = sound power level (dB)

r = distance (metres)

4.14 There will be a noise barrier attenuation of 8 dB(A) provided by the intervening building to the rear. The barrier calculation is shown in Appendix IV.

4.15 Based on the manufacturer's data and our experience of this type of equipment, we do not expect the equipment to feature tonal or impulsive characteristics readily distinctive against the residual acoustic environment. The condensers will operate on demand and therefore will be intermittent. As such, we have applied a +3 dB acoustic feature correction for intermittency when calculating the rating level of sound from the condensers in accordance with the guidance in BS 4142.

4.16 The predicted condenser noise levels incident on the nearest habitable room window are shown in Table 6. This assumes both condensers are operating simultaneously to consider a worst-case scenario.

Table 6: Predicted Condenser Noise at Nearest Habitable Room Window

Description	dB(A)
Single condenser sound power level (dB L_w)	61
Two condensers sound power level (dB L_w)	64
Distance attenuation to nearest habitable room window (12 metres, hemispherical propagation)	-30
Barrier attenuation	-8
Resultant condensers specific sound level at nearest habitable room window (dB $L_{Aeq,15mins}$)	26
Acoustic feature correction	+3
Rating level	29
Lowest measured night-time background noise level at rear (dB $L_{A90,15mins}$)	43
Comparison (Rating level – $L_{A90,15mins}$)	-14

4.17 As can be seen from the result in Table 6, the plant noise rating level is predicted to be 14 dB(A) below the measured background noise levels. BS 4142 states, "Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context."

4.18 Taking into consideration context, the specific sound level is at least 20 dB(A) below the measured prevailing L_{Aeq} ambient night-time levels. This also indicates a low impact. On this basis, no specific noise mitigation measures are required for the condensers.

4.19 Based on this assessment, the noise impact of the condensers is expected to result in no discernible loss of amenity at the nearest noise-sensitive premises.

Outdoor Customer Noise

4.20 This section is to consider the potential noise impact at night from customers arriving at or leaving from the premises. Based on our experience of monitoring existing AGCs in Greater London, customers mostly arrive and leave alone or in pairs, and do not make significant noise. We expect similar to occur at this location. Based on expected occupancy levels at the proposed venue, around two to three customers are likely to arrive or leave in a 15-minute period at peak times.

4.21 If customers have a conversation when leaving, typical speech noise levels are around 65 dB(A) @ 1 metre. Taking into consideration the distance to the nearest proposed habitable-room window at the front, this will reduce to 50 dB(A) at first floor level. This is below the lowest measured night-time $L_{Aeq,15mins}$ level at the front of the building. It would also not be distinguishable from other conversing passers-by. Based on this, noise impact from customers arriving at or leaving from the premises is predicted to be low.

5.0 CONCLUSIONS

5.1 A noise assessment of the proposed new Adult Gaming Centre at 55 Fleet Street, London has been carried out.

5.2 This assessment has involved carrying out a baseline noise monitoring survey to establish the existing noise climate outside the building.

5.3 Noise measurements have been made in an existing AGC to provide reference internal noise levels for the expected gaming activities at the proposed development.

5.4 Limits for residential noise impact have been set based on relevant British standards.

5.5 Based on the reference noise levels and our recommended internal residential noise limits, the performance of the acoustic separation between the ground floor space and the proposed first-floor flat above has been specified.

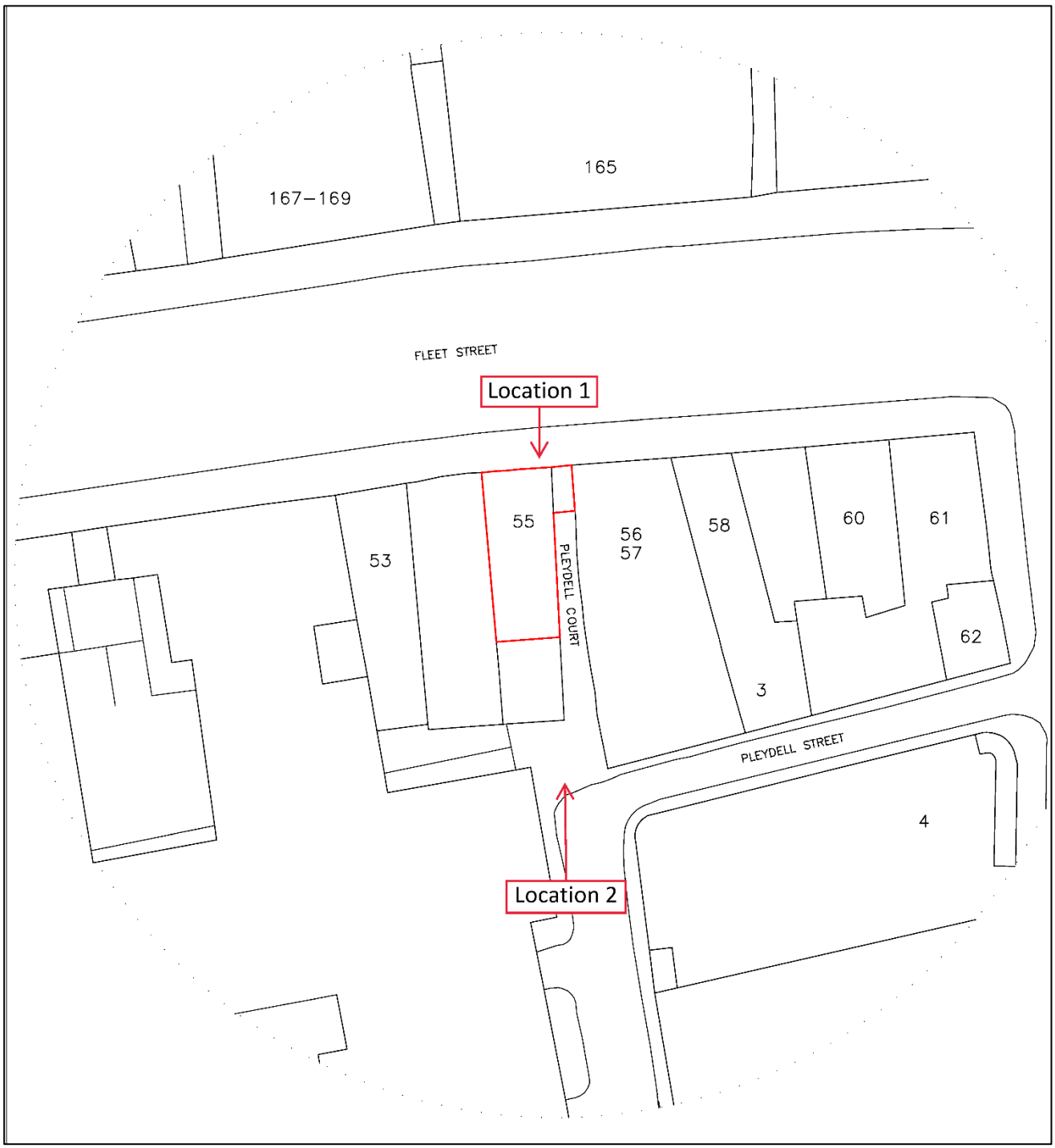
5.6 Noise breakout has been predicted and found to be low.

5.7 The noise impact of the condensers serving the climate control system for the premises has been determined and found to be low.

5.8 Comments on the likely noise impact of customers arriving and leaving the premises at night have also been provided.

5.9 By following the recommendations in this report, we conclude that the noise impact of the proposed development will not result in a discernible loss of amenity to local residents or hotel guests.

Figure 1 – Site Location



Appendix I: Noise Units & Indices

Sound and the decibel

A sound wave is a small fluctuation of atmospheric pressure. The human ear responds to these variations in pressure, producing the sensation of hearing. The ear can detect a very wide range of pressure variations. In order to cope with this wide range of pressure variations, a logarithmic scale is used to convert the values into manageable numbers. Although it might seem unusual to use a logarithmic scale to measure a physical phenomenon, it has been found that human hearing also responds to sound in an approximately logarithmic fashion. The dB (decibel) is the logarithmic unit used to describe sound (or noise) levels. The usual range of sound pressure levels is from 0 dB (threshold of hearing) to 120 dB (threshold of pain).

Due to the logarithmic nature of decibels, when two noises of the same level are combined together, the total noise level is (under normal circumstances) 3 dB(A) higher than each of the individual noise levels e.g. 60 dB(A) plus 60 dB(A) = 63 dB(A). In terms of perceived 'loudness', a 3 dB(A) variation in noise level is a relatively small (but nevertheless just noticeable) change. An increase in noise level of 10 dB(A) generally corresponds to a doubling of perceived loudness. Likewise, a reduction in noise level of 10 dB(A) generally corresponds to a halving of perceived loudness.

The ear is not equally sensitive to sound at all frequencies. It is less sensitive to sound at low and very high frequencies, compared with the frequencies in between. Therefore, when measuring a sound made up of different frequencies, it is often useful to 'weight' each frequency appropriately, so that the measurement correlates better with what a person would actually hear. This is usually achieved by using an electronic filter called the 'A' weighting, which is built into sound level meters. Noise levels measured using the 'A' weighting are denoted dB(A) or dBA.

Frequency and Hertz (Hz)

As well as the loudness of a sound, the frequency content of a sound is also very important. Frequency is a measure of the rate of fluctuation of a sound wave. The unit used is cycles per second, or hertz (Hz). Sometimes large frequency values are written as kiloHertz (kHz), where 1 kHz = 1000 Hz.

Young people with normal hearing can hear frequencies in the range 20 Hz to 20 kHz. However, the upper frequency limit gradually reduces as a person gets older.

Glossary of Terms

$L_{Aeq,\,T}$ This is the A–weighted 'equivalent continuous noise level' which is an average of the total sound energy measured over a specified time period, T. In other words, $L_{Aeq,T}$ is the level of a continuous noise which has the same total (A–weighted) energy as the real fluctuating noise, measured over the same time period, T. It is increasingly being used as the preferred parameter for all forms of environmental noise.

$L_{Amax,f}$ This is the maximum A–weighted noise level that was recorded during a sample duration, with the sound level meter on the 'fast' setting.

$L_{A90,T}$ This is the A–weighted noise level exceeded for 90% of the time period, T. $L_{A90,T}$ is used as a measure of background noise.

Appendix II: Noise Survey Results

Location 1

Equipment: Brüel & Kjær 2250 'Class 1' Sound Analyser (serial no. 3011626) with tripod and windshield
Weather: Dry, wind speed below 5 m/s

All levels in dB re 20 µPa.

Table A1: Measured external noise levels (dB)

Start	Duration (h:mm:ss)	$L_{Amax,f}$	$L_{Aeq,T}$	$L_{A90,T}$
16/05/2024 01:00	0:15:00	74	64	49
16/05/2024 01:15	0:15:00	69	65	50
16/05/2024 01:30	0:15:00	68	63	52
16/05/2024 01:45	0:15:00	68	66	54
16/05/2024 02:00	0:15:00	72	64	50
16/05/2024 02:15	0:15:00	69	64	51
16/05/2024 02:30	0:15:00	74	63	50
16/05/2024 02:45	0:15:00	70	65	49
16/05/2024 13:00	0:15:00	85	70	60
16/05/2024 13:15	0:15:00	78	72	61
16/05/2024 13:30	0:15:00	78	73	61
16/05/2024 13:45	0:15:00	85	70	59
16/05/2024 14:00	0:15:00	81	68	59
16/05/2024 14:15	0:15:00	84	71	60
16/05/2024 14:30	0:15:00	88	70	61
16/05/2024 14:45	0:15:00	85	72	61

Location 2

Equipment: NTi XL2-TA 'Class 1' sound level meter (serial no. A2A-20294-E0) with tripod and windshield
Weather: Dry, wind speed below 5 m/s

All levels in dB re 20 µPa.

Table A2: Measured external noise levels (dB)

Start	Duration (h:mm:ss)	$L_{Amax,f}$	$L_{Aeq,T}$	$L_{A90,T}$
16/05/2024 01:00	0:15:00	69	49	45
16/05/2024 01:15	0:15:00	72	51	44
16/05/2024 01:30	0:15:00	73	52	45
16/05/2024 01:45	0:15:00	71	53	46
16/05/2024 02:00	0:15:00	72	53	43
16/05/2024 02:15	0:15:00	78	56	44
16/05/2024 02:30	0:15:00	70	57	46
16/05/2024 02:45	0:15:00	69	51	45
16/05/2024 13:00	0:15:00	79	49	45
16/05/2024 13:15	0:15:00	82	56	51
16/05/2024 13:30	0:15:00	77	58	51
16/05/2024 13:45	0:15:00	78	63	53
16/05/2024 14:00	0:15:00	78	58	50
16/05/2024 14:15	0:15:00	79	56	50
16/05/2024 14:30	0:15:00	80	57	51
16/05/2024 14:45	0:15:00	78	55	49

Reference internal noise levels at existing Adult Gaming Centre, 3 Seven Sisters Road, London

Equipment: Brüel & Kjær 2250 Type 1 Sound Analyser (serial no. 3011626) with tripod and windshield
Date: Thursday 29th November 2018

All levels in dB re 20 µPa.

Table A3: Measured internal noise levels (dB)

Location	Time start	Time end	$L_{Amax,f}$	$L_{Aeq,5mins}$	$L_{A90,5mins}$
Gaming Area	18:45	18:50	78	66	60
	18:50	18:55	91	68	61
	18:55	19:00	89	67	61
	19:00	19:05	81	65	61
	19:05	19:10	72	64	60
	19:10	19:15	77	61	57
	19:15	19:20	90	65	60
	19:20	19:25	82	66	62
	19:25	19:30	77	68	60
	19:30	19:35	79	63	58
	19:35	19:40	82	64	61
	19:40	19:45	80	64	60

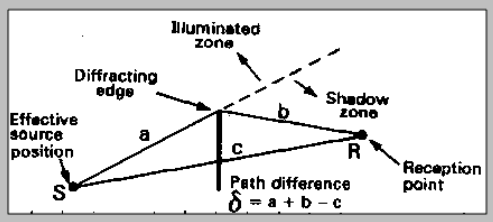
Appendix III: Barrier Calculation

Barrier Attenuation	h (Source)	h(Receiver)	h(Barrier)	d(S-B)	d(B-R)	d(S-B-R)	d(SBR)	d(SR)
	4.5	42.0	9.0	1.0	11.0	12.0	39.39	39.37

a	b	c	Path Diff	Log
4.61	34.79	39.37	0.021612	-1.67E+00

Frequency (Hz)	500	h(S)-H(R)	h(S)-H(R)/SBR	Theta	h(min shadow)	Zone
Speed (c)	344	37.5	3.125	1.261093	7.625	Shadow

		Freq Hz	Barrier Correction dB	
	At Frequency (Hz)			
Fresnel				-6.3
Octave Band		63		-5.0
		125		-5.2
		250		-5.6
		500	BS5228	-6.3
		1000		-7.4
		2000		-9.0
		4000		-11.2
		8000		-13.6



Minimum mass kg/m^2	10.0

	BS5228								
	63	125	250	500	1k	2k	4k	8k	A
Fresnel/BS5228	-5	-5	-6	-6	-7	-9	-11	-14	-8

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Date 26 July 2024
Our Ref 24/04420/NPLN
Your Ref 24/00635/FULL

Subject 55 Fleet Street London EC4Y 1JU

Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).

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

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

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required

prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

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

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

The use hereby permitted shall not be open to customers between the hours of 23:00 on one day and 08:00 on the following day.

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

Self-closing mechanisms must be fitted on the entrance door before the use hereby permitted commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.

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

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the proposed bedrooms does not exceed NR30 and does not exceed NR35 in other habitable rooms attributable to the proposed use of the ground floor and/or basement levels. The report should consider anticipated noise levels within the proposed usage, the sound insulation properties of the party structures and any possible noise flanking pathways. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

Regards

Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Design Out Crime Office
Partnership & Prevention Hub
Bishopsgate Police Station
182 Bishopsgate
City of London
EC2M 4LN
Telephone: 0207 601 2476
Mobile:

City of London Planning Department

Guildhall

Dear Kieran McCallum,

Great to meet you at 55 Fleet Street today and I really do feel that this was a worthwhile meeting with the applicants and yourself.

The applicant's proposal to utilise the site for the purpose of a "miniature casino" type gambling establishment is one that I haven't encountered before, but my advice will be based on the crime profile for the local area and the potential threat assessment that I would associate with a venue such as this one.

Having spoken with the applicant at the site, I was able to establish that the premises will operate on a card and cash basis, which is usual for their business. They confirmed that they would look to maintain a conservative cash-based flow of around £15,000 on the site on a weekly basis, held in the machines or within a electronic safe, held on the shop floor. The machines would be emptied on a weekly basis and the money deposited via the operating taking this to a banking establishment.

The store was stated to operate with two members of staff, a remote CCTV system that was monitored locally, access-controlled door to basement toilets for patrons and a further application to be submitted for the upper floors to be converted to residential apartments. (Further office space was to be established within the basement rooms but not confirmed for what use at the point of meeting).

Store front -

It would be my recommendation to ensure that due to high value items and money maintained on the property, that the property be treated as one would treat a Jewellers. The replacement of the current aluminium fitted glazed units with an integrated door and window set meeting the following standard - LPS 1175 SR3/4 rating as a minimum, the glazing should be rated to a standard similar to EN1627 RC5 of P7B glazing. This resistance is achieved through the use of several different layers of polymer and lamination and provides a high level of resistance to attack.

The applicant mentioned that the use of electromagnetic locks was a common feature with the front entrance, should they wish to restrict access. It would be my recommendation that the applicant would be better advised to not retrofit any security features, such as Maglocks to the external door set due to that fact, that the testing methods for all accredited door sets are done with the originally fitted locks and fixtures. In this instance, a door set with an electro- magnetic strike lock would be far more advisable.

The externally glazed units that run to the side of the property in Pleydell Court, would also have to be replaced and meet the aforementioned glazing standards to the front of the property.

When consideration is given to the change, the property would benefit from a review of the low-lying footplate to the frontage, that extends to the Pleydell Court. It would be of benefit to consider the structure integrity of this part of the building and its ability in maintaining structural integrity, should it subject to a vehicle-based attack with an enhanced glazing and door system.

Further consideration should be given to the current side entrance within Pleydell Court and also the scalable building furniture to the side of the property (vents and drainpipes). The windows in line within the reachable distance of the external piping etc. should be replaced with glazed units that meet a minimum of PAS24;2022.

Internal

The commercial space within the property that is proposed for use is small. The introduction of a number of "slot machines" would potentially drastically reduce the floor space.

The upper floors of the property are proposed to be used for residential purposes.

There is only one internal door within the space, which leads to the basement and upper floors. It was stated by the applicants that they wished to utilise the basement toilets for the establishment. It would be my recommendation to the applicants that this idea should be abandoned. The proposed use of the basement toilets would open the property to issue of

unrestricted access to the upper floors of the property and also allow for nefarious users of the business to allow access from the Pleydell Court entrance into the property. This exit on Pleydell Court, would form an essential means of access to the residents on the upper floors and also an important fire egress point. This would mean that the door set would have to meet fire safety regulations and be fitted with green push button door releasers and also green break glasses.

It would be my recommendation, that should the property maintain the current interior door, that this should meet a minimum standard of LPS 1175 SR3 rating to effectively control access into the commercial part of the property. (This would offer a reasonable escape route should the premises come under attack from determined offenders.

The exterior door set for Pleydell Court, similarly should meet a security rating of LPS 1175 SR2. This is lower that the frontage of the property, but I have balanced this against the dual layer of security and the prospect that it could be reasonably assumed that the doors are unconnected.

The proposal of moving the toilet facilities into the commercial space of the property would significantly reduce the potential operating footprint of the property and I'm sure that the HSE requirements would potentially find issue. There is also the consideration of where any cash desk/staff position would be placed within the venue.

The property should be fitted with an alarm system that meets with an alarm system that meets with BS EN 50131 Grade 4 from an accredited NSI or SSAIB company. This alarm system should be fitted with a panic alarm system and be monitored by a Central Station Alarm company. This system should be fitted along with a CCTV system that meets with BS 7958 and BS 62676 standards and should be installed by a professional supplier.

Any furniture that would be installed within the venue should be affixed to the floor.

Any safe on the property, which was muted to be placed on the commercial floor of the property, should be rated to a minimum of EN 1143-1:2012 Grade 3 rating. Placement of the safe would be dependent on the security adopted for the venue.

I have reviewed the usual specifications aligned with gambling establishments within the UK and it would seem prudent to adhere to their guidance in this instance, as such a recommendation for the cashier station, would be for the position to be fitted with a reinforced screened area where they can operate safely. This is a small environment and not akin to a larger casino style venture.

I'm unclear of this rule, but on reading it would seem that under the Gambling Act 2005, it is prohibited for any venue to operate with clear views into the property. This would increase the importance of staff actively monitoring those approaching or loitering outside of the venue.

In this instance, whist I have no objections to the planning application, it does appear that to meet the security requirements commensurate with the risk associated with the premises, it would require a substantial amount of capital investment, which I would make an application as a condition of build, should the project move forward.

I wouldn't support the property being operated 24hrs a day, especially linked with the residential property potential above. Further to that, the potential for the property to attract crime, would be greater.

I hope that this report finds you well, and if you have any further questions or concerns, please do not hesitate to contact me.

Yours sincerely

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub
City of London Police |Bishopsgate Police Station|182 Bishopsgate, London, EC2M 4NP
T: +44 20 7601 2476 - Mobile :- 07498 418513
Email: russell.pengelly@cityoflondon.police.uk

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Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Dr Jennifer Cleverton
Address: Flat 1 54A Fleet Street London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:My husband (who suffers insomnia and other medical issues) and I object to this application for the following reasons:
1. The premises will be operating 24 hours, 7 days a week immediately next door to our existing residential premise, meaning that people will be entering and exiting throughout the night.
2. This will result in noise both from inside (operation of slot machines) and outside with customers talking. The noise assessment is based on an assumption of 1-2 people exiting at any point in time. This could be a higher number of people.
3. Such noise wakes us up during the night affecting our residential amenity. We can hear any conversations at night from Fleet St or Pleydell St.
4. This gambling business could affect the security of our property during the night.
5. We do not consider that a gambling business meets the requirement for a principal shopping street or is suitable.
6. We consider that a gambling business is not one that the City of London should be encouraging.
7. We are concerned that individual customers that may be attracted to come to such a gambling facility will not be appropriate in an area surrounded by residential units (54 and 53 Fleet) and will affect residential safety and security.
It is for these reasons that we object to the application for change of use to an adult gaming centre.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Rachel Blake MP
Address: House of Commons London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:I do not believe that an Adult Gaming Centre in this location is in-keeping with the character of the local neighbourhood, nor in line with the priorities of the City Plan.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Ann Holmes
Address: Flat 1 43 Bartholomew Close London

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I think this would be an inappropriate use of property in this area, and would be likely to detract from rather than add to the quality of the neighbourhood.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Mr OLiver Sells
Address: 1 harcourt buildings Temple

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This type of application is unsuited to this area.
It has the potential to undermine this historic area and bring inappropriate activity to the city of london.
We should not encourage gaming in this way. It is quite outside the plans for this area.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Miss Alpa Raja
Address: City of London guildhall London

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:This kind of establishment would not be congruent to the landscape of the area.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Amanda Singleton
Address: Flat 7 7 wine office court London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity

Comment:I strongly object to this application. It would be absurd to site this kind of business on Fleet Street. It would be totally out of keeping with the historic Fleet Street neighbourhood and is not in line with the city plan.

It is my opinion that the proposed business would detract from the residential amenity of fleet st and I am concerned that it will create noise and would attract and be to the detriment of vulnerable adults.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Mrs Wendy Mead OBE CC
Address: 8 Fremont Street< London E9 7NQ LONDON

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object most strongly to this proposal, it will be completely out of place in this largely legal and business environment. Fleet Street is world famous and attracts many tourists who come see the Inns of Court, the riverside, the historic pubs like The Cheshire Cheese and to visit Dr. Johnson's House. This proposal will downgrade a much loved area.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Miss Catherine McGuinness
Address: Guildhall London

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I object to this application. It is not in keeping with the history and nature of the area, will not assist positively in its regeneration, and is not consistent with the City Plan.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Mr JEREMY SIMONS
Address: 4 PEMBERTON ROW LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I write as a nearby resident. I wish to object to this planning application.
The City's recently issued Corporate Plan has the following words in huge type on the front cover "Live", "Work", "Learn" and "Explore", the first word being "Live". In the introduction, two statements of the Chair of Policy are highlighted. The first reads: "By improving our public services and cultural offer, we want our residents to be able to call the Square Mile the best place to live".
I find it hard to understand that this planning application will promote this very worthy objective. An Adult Gaming Centre is neither cultural nor is it likely to assist in making the Square Mile the best place to live.
The location is not compatible with being in a Conservation Area, nor on the City's principal street.
The potential for noise from "customers" arriving and leaving the premises causing disturbance to local residents, particularly those in the vicinity, has not been adequately considered. Such noise after normal business hours should not be underestimated.
For the above reasons, I object to the planning application for a change of use of 55 Fleet Street to an Adult Gaming Centre.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Mr George Godfrey
Address: 3rd Floor 12 Gough Square London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:An Adult Gaming Centre is not in keeping with the historic, cultural, or professional environment of Fleet Street. It goes against the health priorities of the City Plan and poses a significant threat to both the residential and general amenities of Fleet Street.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Mrs Henrika Priest
Address: Flat 3, 101 Fleet Street London

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I strongly object to this application. As a resident of Fleet Street of 27 years, I cannot think of a more unsuitable business to be added to this area: it's not in keeping with the local neighbourhood, its past history, or, more importantly, what Fleet Street is striving to become through the current regeneration. In a period of cost-of-living crisis, the City should not facilitate gaming by approving this type of application to the detriment of vulnerable adults. This type of establishment will add precisely zero to the area, other than noise and potential anti-social behaviour, and become a magnet for those with gambling issues. This is certainly not part of the City Plan, so should therefore be rejected.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Mr John Griffiths
Address: PO Box 270 Guildhall London

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I wish to oppose the application on the grounds that it would have a negative impact on the character and function of the area and likely be a magnet for anti-social and criminal behaviour. A gambling premises on Fleet Street is out of keeping with the planned Fleet Street revitalisation programme being led by the FSQ BID. Such an amenity could well put off other quality and independent retailers which we are looking to attract back to the street.

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Leyla Ostovar
Address: 1-2 Bolt Court London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Tana Adkin KC
Address: Hamilton House 1 Temple Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Helen Ladele
Address: 108 Fleet Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Vasiliki Manta
Address: 108 Fleet Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Adela Gregory
Address: 8-10 New Fetter Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Steph Steeden
Address: 3 Dorset Rise London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Sue Farrington
Address: 18-20 Bride Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Bethany Coombs
Address: Pemberton Row London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out in our letter dated 5th November 2024. We also enclose a petition with signatures from workers and residents in the area. Just under 200 signatures have been received to date and more are forthcoming.

The reasons we give in our letter are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Martha Grekos
Address: City of London Corporation Guildhall, Aldermanbury, London

Comment Details

Commenter Type: Alderman
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I support the comments made by my constituents - Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory, Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden - in their letter dated 5th November 2024. This application is indeed contrary to planning policies DM20.1 and DM3.5 as well as likely to create a heightened risk in anti-social behaviour.

I agree with the signatories to the petition, of which I am one of those, that this application should be rejected. There are under 200 signatures received to date and more are forthcoming.

Further, the City of London Corporation needs to introduce a restriction of such units in their draft Local Plan in order to make sure that the vitality of not just Fleet Street, but the whole of the City, is not jeopardised.

5th November 2024

C/O: Planning Officer Kieran McCallum
Planning Department
City of London Corporation

BY EMAIL: PLNComments@cityoflondon.gov.uk

Dear Kieran,

Re: Planning application 24/00635/FULL for the Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC) at 55 Fleet Street London EC4Y 1JU

OBJECTION

As workers and residents within the immediate area, we along with Alderwoman Martha Grekos, are objecting to the above application for the reasons set out below. We also enclose a petition with signatures from workers and residents in the area.

The planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

Contrary to Planning Policy Policy DM20.1

This application is contrary to Core Strategy Policy CS20, Policy DM20.1 and emerging policy RME2 which fundamentally protecting Fleet Street as a Principal Shopping Centre. As the policy mentions, retail contributes to the City's vitality and provides an important service for all the City's communities – workers, residents and visitors. Policy DM20.1 states that priority should be given to A1 shops at street level, but this application is for a change of use from A1 to Suis Generis which has failed to demonstrate regard to the retail hierarchy in the City and has not adopted a sequential approach to site selection, whilst ensuring that it does not compromise the City's primary business function. In addition, it fails to show how the Adult Gaming Centre use will contribute to the function and character of Fleet Street as a Principal Shopping Centre and does not enhance its vibrancy. The loss of A1 space is therefore not justified.

Contrary to Planning Policy Policy DM3.5

This application is also contrary to Policy DM3.5 (Night-time entertainment). Policy DM 3.5 states that: "Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on: (i) the amenity of residents and other noise-sensitive uses; (ii)environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises."

The applicant has failed to provide a Management Statement to detail how these issues will be met, especially as it is proposing a 24 hours 7 days a week operation. The applicant has not shown how the amenity of the residents and other noise-sensitive uses have been considered nor are we satisfied that the environmental amenity has also been taken into account. Behind Fleet Street, on both sides, there is a large residential community found on Johnson's Court and Bolt Court. There are also flats at 171 Fleet Street and blocks of flats in Red Lion Court and Crane Court, Pleydell Street and on Temple Avenue/Tudor Street too. In addition, we are welcoming, a

large student accommodation block of 850 residential units at 65 Fleet Street. The noise caused by a 24 hours / 7 days a week operation will mean large disturbance to residents' sleep. Indeed, it will also have a huge impact on the businesses in the area. No other premises on Fleet Street is open beyond 11pm in order to fit in with the local context and to respect the residents' amenity as well as the business community.

Heightened risk in anti-social behaviour

Lastly, there is likely to be an increase in anti-social behaviour and such premises will put the community at risk of public nuisance. The area has a notable number of reports of antisocial behaviour incidents reported to the police, reflected in crime statistics. We also have a large number of homeless people that need to be protected and not be made more vulnerable due to such establishments. Cumulatively, given this situation can pose difficulties for staff in dealing with challenging customer behaviour that may arise. Our alleyways and courtyards just off Fleet Street are where such anti-social behaviour will congregate, impacting residents, given that is where the majority of the residential blocks are situated. In addition, there will be more rubbish in those alleyways and courtyards and on the main street and nothing has been suggested as to how to abate this.

This Adult Gaming Centre is also proposed very close to the new criminal court centre opening on Fleet Street shortly. This means significant numbers of vulnerable people attending court and suggests targeting of the vulnerable in this area. The location is therefore wholly inappropriate and conflicts with the area being a Legal Quarter, its history of newspapers and journalism as well as being designated for retail.

Conclusion

Given the lack of detail and consideration of the City of London Corporation's planning policies, we urge you to decline this application.

With best wishes,

Tana Adkin, Beth Coombs, Sue Farrington, Adela Gregory,
Helen Ladele, Vasiliki Manta, Leyla Ostovar and Steph Steeden

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	SIGNATURE
1	LEYLA OSTOJAR	[redacted]
2	MICHAEL WINFIELD	
3	JEAN-PIERRE ALBIN	
4	CHRIS SHIELLS	
5	Abraham Gonzalez	
6	Inmaculada Rabasco	
7	MARY BATZ	
8	CRISTIANA SCIÒ	
9	ZARA DE SANTYS	
10	ILONA KAUNECKAITĖ-SIMAITIENĖ	
11	ERICA IZZO	
12	NICHOLAS MASTERS	
13	Henry James	
14	Rael Maffalieu	
15	Sandra Lawland	
16	Riam Ismael	
17	LAURA BONNÉ	
18	Elen Sommer-Erichson	
19	Danah Marzouq	
20	Gregor Davis	
21	NGAN THAT	
22	LAN NGUYEN	
23	CHI	
24	Li	
25	Tawlant Bethi	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	SIGNATURE
1	Sin Lai	[redacted]
2	SIDONIE ROSS	
3	FRANCESCO DELVECCHIO	
4	HELEN LADELE	
5	Mshael Mushtaq	
6	Tana Adiwin KC	
7	Jennifer Anderson	
8	PIERRE-MARIE DIEVART	
9	Jack Caulfield-Ross	
10	Tom Parker	
11	E. Berger-Rayton	
12	GLENN MATTHEWS	
13	GABRIELLA FALLIANO	
14	Charles Cooper	
15	Benjamin Cooper	
16	Erita Pareca	
17	Todd McMichael	
18	Marisha Patel	
19	Supriobaha Chowdhury	
20	M.D. Anamul Haq	
21	Asad Bek	
22	Ishan Panchal	
23	Abdur Rahman	
24	TU HOANG	
25	THU LE	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	SIGNATURE
1	AZEEM HUSSAIN	[redacted]
2	Priscilla Khanna	
3	Brian Turner	
4	Wilfred Barley	
5	Nico Wong	
6	Jason Wright	
7	MISHA GUGNEGC	
8	AMANDA SINGLETON	
9	RICHARD DEENEY	
10	STEVEN RUMBLES	
11	CHUNHENG JEN	
12	Rebecca Dreier	
13	Isabella Ordonez	
14	JULIA FAIERS	
15		
16	Buthaina Heshmat	
17	BOCCHETTI SARA	
18	Filiz SEYFI	
19	Elizabeth Hirosi	
20	DIBBAY	
21	BETHANY COOMBS	
22	DARIO ITTRIA	
23	MICHAELA CUNA	
24	Gloria Cicchetti	
25	Jaime Diaz de Rivera	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	[redacted]
1	ARVIND SHAH	
2	NATHALIE YIP	
3	PRANAV. RAGHVANT	
4	NILESH SHAH	
5	ARUMUGAM SIVASANTHIRAN	
6	WILLIAM WAN	
7	CATHERINE NG	
8	JOEL FIELD	
9	MELINDA SZATMARI	
10	DIANA TUDOSANYI	
11	Mohammad- LITON	
12	Mahbubul Alam	
13	Ali Ahamm	
14	Sejan	
15	Olawale Olonfunmi	
16	Ael —	
17	Julian Coop	
18	Erika Gabrielli	
19		
20	Alice Gosling	
21	Jamel Burin	
22	S. HAWKEY-SAYARES	
23	SBRUNING	
24	MFARMONER	
25	ALISON LEE	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	SIGNATURE
1	Ana Oliveira	[redacted]
2	LAURINE Texier	
3	Aleksandra Ciso	
4	PETER SCHEGGIA	
5	Celal Kanidagli	
6	Yang Li	
7	Hua ZHOU	
8	OLIVIA WILLIAMS	
9	Jack Randall	
10	Owain Huntley	
11	Anya Kirkhope	
12	Aaron Rimmer	
13	Tracey Griffiths	
14	Tom Whall	
15	Maria Kuzmen	
16	CALLUM FITZPATRICK	
17	Charlotte Simpson	
18	DES ADDIS	
19	Barbara Mcgregor	
20	JAMES RALPH	
21	Ben Underhill	
22	Mark Rowlands	
23	Maryam Khan	
24	Karolina Luigo	
25	MARTHA GREGG	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	SIGNATURE
1	Yasmin Hussein	[redacted]
2	Pascal Livrikri	
3	christian Sandoval	
4	DANIEL JEAN-BAPTISTE	
5	SUE FARRINGTON	
6	DAVID ATKINSON	
7	Annabel Moore	
8	Julie Stepleska	
9	MICHAEL SOLARIN	
10	GEMMA CORNWELL	
11	SARAH FRANKLIN	
12	OLIVER BENJAMIN	
13	Bismah Maqbool	
14	BEN PHILLIPS	
15	LUCY BARRY	
16	LESLI FLINN	
17	KEVIN COGTREE	
18	IVAN OLIVEIRA	
19	ARTUR Mihaleean	
20	GEORGE LAMPATHAKIS.	
21	Alex Skelton	
22	AURIMAS RAZINSKAS	
23	HENA MALIK	
24	MARUF HOSSAIN	
25	STUART WILLIAMS.	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	SIGNATURE
1	MR. ICISMIN THANRANI	[redacted]
2	Kaka Sivanadiam	
3	Kay Khairadin	
4	Kindal Atherton	
5	JAMES HAYES	
6	Renata Pataki	
7	Chony Rubiera	
8	Alberto Rubiera	
9	JESUS IGLESIAS	
10	Ilda Ciliana Santos	
11	[illegible]	
12	Ana Maestre	
13	A. DEGFDIGES	
14	OLARU LEONARD PAUL	
15	ASIF	
16	VASILIKI MANTA	
17	SANJANA	
18	MR MICHAEL GLOMAN	
19	MARTA ERICE	
20	KURT BAUR	
21	GARETH EVANS	
22	JAKE TUCKEY	
23	DAN GREIFER	
24	DUNCAN BARR	
25	RP Lohn	

PETITION AGAINST THE PROPOSED ADULT GAMING CENTRE AT 55 FLEET STREET

We, the undersigned, object to the above proposals because they are (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

	NAME	[redacted]
1	R TITCHENER	
2	A CONWAY	
3	M Todd	
4	I RODRIGUES	
5	D ola	
6	J Amers	
7	L. Bata	
8	DAN STRATONE	
9	D. VASILACHE	
10	A. LUPES	
11	A. GJOICA	
12		
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25		

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Ms Jo Woods
Address: Powell Gilbert LLP 85 Fleet Street London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:a) Contrary to planning policy; specifically in undermining Fleet Street as a Principal shopping centre
b) Contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and
c) Likely to create a heightened risk in anti-social behaviour

Comments for Planning Application 24/00635/FULL

Application Summary

Application Number: 24/00635/FULL
Address: 55 Fleet Street London EC4Y 1JU
Proposal: Change of Use from vacant office use on part basement and ground floor to an Adult Gaming Centre (AGC).
Case Officer: Kieran McCallum

Customer Details

Name: Miss Alison Phillips
Address: Powell Gilbert 85 Fleet Street London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As workers and residents within the immediate area, we are objecting to the above application for the reasons which are summarised here: the planning application is (a) contrary to planning policy, specifically in undermining Fleet Street as a Principal Shopping Centre; (b) contrary to the environmental amenity needs of the area given its proposed 24 hours Monday to Sunday operating hours; and (c) likely to create a heightened risk in anti-social behaviour.

With best wishes,

Alison Phillips on behalf of the Partners at Powell Gilbert LLP, 85 Fleet Street London EC4Y 1AE

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