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Planning Applications Sub-Committee

Date: **TUESDAY, 30 SEPTEMBER 2025**

Time: 10.30 am

Venue: **LIVERY HALL - GUILDHALL**

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chairman)
Tana Adkin
Samapti Bagchi
Matthew Bell
Deputy Emily Benn
Deputy John Edwards
Anthony David Fitzpatrick
Deputy Marianne Fredericks
Alderman Alison Gowman CBE
Alderman Prem Goyal CBE
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
Tim McNally
Sophia Mooney
Deputy Alastair Moss
Alderwoman Jennette Newman
Deborah Oliver
Deputy Henry Pollard
Alderman Simon Pryke
Deputy Nighat Qureishi
Robertshaw
Hugh Selka
Naresh Hari Sonpar
William Upton KC
Matthew Waters
Jacqui Webster

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To consider minutes as follows:

a) To agree the public minutes of the Planning Applications Sub-Committee on 17 June 2025 (Pages 5 - 22)

b) To agree the public minutes of the Planning Applications Sub-Committee on 8 July 2025 (Pages 23 - 46)

c) To agree the public minutes of the Planning Applications Sub-Committee on 9 September 2025 (to follow)

4. **130 FENCHURCH STREET, EC3M 5DJ (25/00529/FULEIA)**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 47 - 500)

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

Report of the Chief Planning Officer and Development Director.

For Information

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

Report of the Chief Planning Officer and Development Director.

For Information

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

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

9. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100a(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act as follows:-

10. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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PLANNING APPLICATIONS SUB-COMMITTEE
Tuesday, 17 June 2025

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Tuesday, 17 June 2025 at 10.30 am

Present

Members:
Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chairman)
Tana Adkin
Samapti Bagchi
Matthew Bell
Deputy John Edwards
Deputy Marianne Fredericks
Alderman Prem Goyal CBE
Josephine Hayes
Deputy Jaspreet Hodgson
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Sophia Mooney
Deborah Oliver
Gaby Robertshaw
Hugh Selka
William Upton KC
Jacqui Webster

Members (in attendance observing):
Oliver Sells KC
Deputy Ann Holmes

Officers:

Polly Dunn	-	Assistant Town Clerk and Executive Director of Governance and Member Services
Fleur Francis	-	Environment Department
Rob McNicol	-	Environment Department
Gwyn Richards	-	Environment Department

Koon Wai Leong, Hoy Hup Reality
Mel Allwood, Arup
Dr Ken Shuttleworth, Make Architects

1. **APOLOGIES**

Apologies for absence were received from, Anthony Fitzpatrick, Alderman Alison Gowman, Deputy Henry Pollard, Alderman Simon Pryke and Deputy Nighat Qureishi.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
There were no declarations.

3. **MINUTES OF THE MEETING HELD ON 6 MAY 2025**
RESOLVED: That the minutes of the meeting held on 6 May 2025 be approved as a correct record.

4. **HIGH HOLBORN**

4a. **319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2 - 24/01262/FULMAJ**

The Sub-Committee considered a report which sought the approval of planning permission for the demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of a new building.

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

Officers confirmed the intention to provide Members with a summary presentation of a more comprehensive presentation which had previously been circulated with the agenda pack, in addition to a further addendum that was circulated on Monday 16 June 2025 to address an additional representation and to include minor corrections. It was noted that this morning a letter had been received from the London Borough of Islington raising no comments to the application. Officers showed the Sub-Committee an image of an aerial view of the site, confirming that the application related to a site located to the northwest part of the City bordering with London Borough of Camden to the north and bounded by High Holborn to the north, Southampton Buildings to the southwest and Staple Inn Buildings to the east. The site partially lies and was surrounded by Chancery Lane conservation area. There were several listed buildings in the vicinity of the site including Staple Inn Buildings immediately adjacent to the east, 25 Southampton Buildings and 10 Furnival Street, the former Patent Office to the south. The application site comprises three buildings namely Holburn Gate, Heron House and 44 Southampton Buildings. Holborn Gate (for which the Sub-Committee were shown a photograph) was a ten-storey office building that was granted planning permission to be redeveloped in 1963. Heron House was also a ten-storey office building that was constructed in 1968. 44 Southampton Buildings which sits within Chancery Lane conservation area was constructed in 1913. The building has undergone numerous internal and external changes including refurbishment in 1965. Planning permission was being sought for an office led development consisting of the demolition of the existing buildings and construction of a new building comprising two basement levels, ground and nine upper storeys and an external plant enclosure. Retail uses, a flexible cultural exhibition,

performance and community space and creative affordable workspace were also proposed at ground and basement levels. A pocket park was proposed to the south of the proposed building. Seven residential units were currently located within the site, which the proposed office led development does not propose to contain on site. To secure the net loss of residential units, re-provision of them was secured via section 106 obligation to ensure that seven units of equivalent floor space were re-provided within the City.

The Sub-Committee were shown an image that set out an overlay of proposed and existing building lines for the development. It was explained how the proposed development follows a more cohesive building line with recess concaved corners. The building line in sections almost aligns with the overhang other than in a small section to the east. It was a contextual approach to an established building line along the southern part of High Holburn. A pedestrian comfort levels assessment was carried out and it showed that peak times the levels achieved were C plus which were considered acceptable for streets of this type. The Sub-Committee were shown images of the existing public realm surrounding the site and highlighting that it was of low quality. On the side there was an existing open space on a raised platform level; opposite the south office entrance there were several underused spaces. The Colonnade along High Holburn lacks natural light and was too narrow for pedestrian movement.

The proposed development was recessing the south façade to the north and would create a new pocket park measuring approximately 640 square metres. The pocket part would introduce new hard and soft landscaping, integrating furniture and seating in an organic form, high quality finishing materials and a water feature. Whilst the proposal would result in a reduction of public realm, it would form a dynamic and inclusive destination that prioritises safety, accessibility and user experience, attracting a diverse mix of visitors and workers. Access to short stay cycle parking would be off High Holburn and long stay off Southampton Buildings. There would be on site serving points into Southampton Buildings to serve the whole development with consolidated deliveries not exceeding 35 vehicles a day. Two bus parking bays were also proposed within the site to serve the development. 745 long stay and 71 short stay policy compliant cycle parking spaces were proposed within the ground and basement levels along with policy compliant end of trip facilities. The Sub-Committee were shown an axonometric plan of the ground floor arrangements and proposed uses including retail floor space along High Holburn and to the southwest corner of the application site. The entrance to the office unit was on the northeast corner of the site whilst the entrance to the cultural offer was onto northwest.

The Sub-Committee were shown a proposed plan of basement levels one and two, ground floor and mezzanine. Alongside the office space, the proposal would deliver a compelling new cultural, exhibition, performance, learning, community offer for the City that would align with the Destination City agenda. The offer extends at basement, lower ground and ground levels measuring over 900 square metres being available to the public. The Sub-Committee were shown a visual of the main venue space that was inspired by the former

Knights Templar Church, which once stood at this space. The space would be able to accommodate 300 people and would be flexible to be used from cultural events to physical and immersive art exhibitions. Supplementing to the auditorium space was a flexible space within the basement level which has the potential to be used for exhibitions, cultural and community workshops or an area for reading and research. At ground floor, accessible from High Holburn, a welcoming space was proposed contingent to any future cultural occupier which its use could span from hosting small exhibitions, operate as a small-scale performance space. The site has multiple historic layers dating back to the 12th century where the first Knights Templar Church was located onto the northwest corner of the application site as shown on the map.

An excavation in 2000 found that some of the original old temple and 1 metre stretch of the church was believed to be present at the basement of the site. The Sub-Committee were shown a CGI image showing this section of the foundation wall, where it was proposed it be exposed within the basement for the flexible cultural offer. This was considered to be an exceptional opportunity to tangibly connect the proposed cultural offer with the history of the site. To uncover the rich history of the site, public art was also proposed to be incorporated in several internal and external places to maximise the identity of the site. The Sub-Committee were shown indicative floor plans for each level, with terraces starting to be introduced on the seventh floor and a plant enclosure on the tenth floor, being shown an image of existing and proposed elevation of the building within this context. Overall, the proposed development would be less than nine metres higher than the existing building.

The Sub-Committee were shown a 3d visual of the proposed building showing the contextual design of the building, the articulation of the facades and reduce massing towards the upper floors. A civic clock would be introduced on the circular northern corner of the building at the ninth floor, being visible from long views and acting as a landmark when approaching from the east. The proposed architectural treatment of the façade takes references from the surrounding buildings being predominantly solid, with deeply recessed windows. There would be a great mixture of high-quality finishing materials including terracotta and brick adding texture and detailing to the façade. The setback facades were clad in reflective black terracotta. The soffits to the balconies would be finished in gold metal referencing the current gold tiles soffits of the existing building. The south elevation would be set back from the listed former patent office to provide a new wider square to the south of the site. The base would be defined by arts openings that would reflect the character of the surrounding inns providing great townscape. The proposed creative affordable workspace and retail unit with spill-out space uses along this section of the building would provide a new active and animated frontage onto the new square. At the crown of the building, the top three floors were set back to ensure subordinance to the main building. Along with the soft landscaping with the new pocket park, the development would retain two of the existing trees along Southampton Buildings passageway. The development would achieve a UGF of 0.3 that meets the policy requirements and bio-diversity value from pre-development to post-development exceeding 900% inhabited units.

Carbon optioneering has been carried out to establish carbon impacts opportunities and constraints to inform the development of the proposal, which was independently reviewed. The proposed development would optimise the quality of floor space for offices and for a mix of cultural and retail uses along with a range of amenity and urban greening measures, thus contributing to the future proofing of the City against a range of environmental, social, economic and sustainability challenges. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing a new building for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in an estimated low energy use intensity and BREEAM excellent. In terms of environmental impact, four scenarios have been tested for wind and there would be no safety exceedance. The Sub-Committee were shown a wind assessment slide for the windiest season, with the proposed on-site and off-site conditions being suitable for their intended use or consistent with the baseline scenario without the need of landscaping. In terms of thermal comfort, the existing scenario conditions ranged between all seasons, seasonal and short-term use. The proposed scenario on-site and off-site conditions were all suitable for their intended use without landscaping. Landscaping was only required on levels seven, eight and nine in the new roof terraces to make them able to be used as mixed amenity terraces.

The site was located near residential properties, 7 High Holburn to the north was a residential let building with residential units from the first to upper floors. The application was supported by daylight, sunlight and overshadowing reports using the BRE methodology. Whilst it was acknowledged that there were some residential properties at 7 High Holburn that would experience impacts, these impacts were less than the BRE guidance levels. The impacts were similar or comparable to comparable properties in the vicinity located in a dense urban environment. In terms of sunlight as shown on the windows, the majority of the windows would be BRE compliant. For the small number of windows that would experience some reductions, the results would be very close to BRE compliance. A median daylight factor analysis was also conducted as a supplement to the BRE recommended metrics. The impacts for most properties would be imperceptible with the exception of the two upper floors. However, the impacts were mainly caused due to the existing overhangs of the building. Seven open spaces have been assessed regarding overshadowing and the results demonstrate that no neighbouring amenity space would be affected by the proposed development and they would be fully BRE compliant.

The application was also supported by an overshadowing assessment of the proposed pocket park. When considering the sunlight levels to the pocket park, the results show 35% of the area would receive two hours of sunlight, which was a slight improvement from the existing space due to the setback of the façade. Moving to the townscape view, the Sub-Committee were shown the existing and proposed view from Gray's Inn Gardens, central path, the view from Gray's Inn Square northwest corner existing and proposed view. They were also shown the view from Lincoln's Inn Fields northeast corner existing and proposed, with the building being visible behind the roof line of Stone

Buildings. Members were shown the existing view from southwest corner of New Square and proposed from which the building would be visible behind 12 and 13 Old Buildings that were located in Camden. The Sub-Committee were shown the view from the northeast corner of New Square existing and proposed where the development can be seen behind the roofs and chimneys of 8 to 15 Old Square. A low level of less than substantial harm was identified to those listed buildings that were located within Camden.

The Sub-Committee were shown a view from High Holburn towards the west existing and proposed, in which one can see the prominence of the proposed civic clock acting as a landmark. A closer view of the application site was shown from the same viewpoint existing and proposed. The existing view to east and proposed was shown, with a nighttime view as existing and proposed. Overall the proposed scheme would minimise light pollution respecting the context of the area. The Sub-Committee were shown the existing and proposed view from Chancery Lane, which one can see that by setting back the building line, the proposal would unveil longer views towards Staple Inn Gardens. The Sub-Committee were shown the view from Southampton Buildings existing and proposed. Also, the view from the southwest corner of Southampton Buildings existing and proposed and showing the high quality of the proposed pocket park. The view from Staple Inn Gardens was shown existing and proposed.

An application for listed building consent has also been submitted alongside this planning application for minor alterations to the set of railings and gates located along the eastern and southern side boundary of Holburn Gate adjoining Staple Inn north gate and 25 Southampton Buildings. As shown on an image presented, some parts of the modern sections of the railings would be removed. The historic railings would be retained and replaced to the development.

In conclusion, it was confirmed that the proposed development would secure a strategic office-led development that would provide land uses which support the diversification, variety, viability, vitality and growth of the City as a 24/7 world class business destination. The provision of over 52 and a half thousand square metres of grade A office floor space and c3000 jobs would significantly contribute to the City of London economic base. The generous and unique cultural offer along with a high-quality retail offer and creative affordable workspace would create a compelling and inclusive public offer to the City in line with the Destination City agenda. The development would result in a slight heritage enhancement to the Chancery Lane conservation area through heritage interpretations and better revealing of the Knights Templar. At a local level, the proposal would result in a significant enhancement to the public realm at ground level by the creation of the proposed pocket park and supporting the well-being of users, the vitality, character and distinctiveness of the area. The proposed contextual building would result in a significant aesthetic to the High Holburn locality. When carrying out the balancing exercise, it was considered that the public benefits would outweigh the identified low level of less than substantial harm to the heritage assets. The environmental impacts of the

development have been assessed in detail in the report and were considered acceptable.

For these reasons, officers were recommending approval of the application, subject to conditions and subject to the execution of planning obligations.

The Chairman conveyed his thanks to the officer for a comprehensive presentation and for explaining why officers have come to their recommendation of approval, having weighed up the various impacts versus the various gains. The Chairman confirmed that there would be an opportunity to go through various speakers, with there being no objectors having asked to speak today. The Chairman confirmed the meeting would now move to applicants and supporters.

The first speaker was Mr Koon Wai Leon, General Manager of Hoi Hup Reality Ltd

Mr Koon Wai Leon addressed the Sub-Committee confirming he was speaking on behalf of the applicant. Mr Koon Wai Leon informed the Sub-Committee that Hoy Hub Reality was a family own business based in Singapore. As a family owned business, the Holburn Gate was deeply personal to the founding family as it represents their very first development outside of Singapore and a gateway to future investment. Hoi Hup Reality was established in 1983 and owns more than £1.2bn of assets across residential, commercial and hospitality sectors. With over 40 years in the industry, they have delivered commercial projects and over 10,000 homes, priding itself on the fact it has grown into one of the top developers in Singapore. Hoi Hup Reality continue to manage most of the hotels and commercial buildings that they have either developed or acquired. Through their sister company, Straits Construction, which was a tier 1 award winning contractor in Singapore also owned by the company. They bring a unique insight into what it takes to construct and complete exciting projects.

To support the company, they have assembled a London-based industry leading team with an exemplary track record of delivering high quality landmark developments that also provide lasting public and social benefits. The proposals presented were transformational, creating a new western gateway to the City of London and driving the continuing renaissance of the wider city. With construction costs of around £370m and an expected gross development value of over £800m, the development would serve as a catalyst for future investment and development in the area. As outlined in the presentation, the proposals would also deliver on the City's key and adopted emerging policies. This includes providing c 53,000 square metres of high-quality grade A office space, contributing significantly to the expected requirement of an additional 1.2 million square metres of office space in the emerging City Plan 2040.

Designed by the world class architect, Make Architects, these elegant new buildings would support approximately 3200 new jobs once it was completed. Plans also include providing affordable workspace and flexible retail space on the ground floor, establishing a new commercial ecosystem around the site. A cornerstone of the approach has been to align to the City's Destination City

ambitions of creating a new seven day a week attraction. A contribution to this would be the Holburn Dome cultural space which would have a prominent location on the northwest corner of the site visible along High Holburn and designed to reflect the site's historical association the Knights Templar. The Dome would include an immersive auditorium that can accommodate up to 300 people, flexible exhibition spaces, as well as areas for community events. To complement the cultural and office use, the public realms surrounding the building would also be transformed into a more welcoming and activated space for the City's businesses, visitors and residents.

To the south of the site, a new pocket park was being introduced with a generous amount of greenery, new sitting space and a water feature, creating a relaxing space that can be enjoyed anytime by the public. This would be completed by new food and beverage options adjacent to it.

Mr Koon Wai Leon thanked the City of London for their collaboration over the past two and a half years. As a new developer to the City, they have found that the process was both welcoming and constructively challenging, pushing them to deliver a best-in-class transformational scheme that would benefit this special city. It was hoped the Sub-Committee would support officers' positive recommendation and approve the proposal before Members today.

The Chair asked the second speaker to address the Sub-Committee and speak to the application.

Dr Ken Shuttleworth, founder of Make Architects, introduced himself and addressed the Sub-Committee. Reference was made to Make Architects being an international architecture practice established in 2024, headquartered in London. Designed and delivered over 150 buildings around the world, including 20 award winning buildings in central London and in the Square Mile. Dr Shuttleworth confirmed that Make Architects were very enthusiastic to present Holburn Gate to Members today. It was believed to be a very exciting proposal, an opportunity to re-imagine a significant site within the City with an exceptional piece of architecture. It was crafted to respond contextually to the sensitivities of the surrounding area whilst providing a high-quality workplace of the future with a bespoke cultural venue at its heart. This reflects the ambition of the City to reposition the area as a world leading commercial and cultural destination as set out in the draft City Plan 2040. It was explained that the design process was started through a retrofit first approach which interrogated and extensive range of options from minor improvements through to full refurbishment. They went way beyond the framework of the City of London's planning advice notes for carbon guidance identifying an exhaustive list of options and undertaking detailed audits of existing buildings. The process benefited by close and viable collaboration with the City of London officers, resulting in a short list of four final options.

The outcome of this process highlighted the challenges of refitting the existing buildings, which posed considerable constraints. The tight floor to ceiling geometry and adequate cores. It was concluded that the current buildings offer very poor-quality office accommodation and were not harmonious with a

sensitive location. Also, existing public realm was highly compromised. Existing buildings were considered unfit for purpose and do not meet the needs of the expectations of city occupiers. As a result, it was agreed with City officers that a new build development was the preferred option to deliver a sustainable, flexible and healthy office building. Having been working together to conceive developments as a stepped masonry buildings divided into five distinct blocks, to together read as a family each tailored to the surrounding context. The architectural language and sensitive material pallet of brick and terracotta draws on the rich history of the site and the unique qualities of the surrounding buildings and conservation areas. It also proposed further enhancing the density of the building with public art and other civic features including a large corner clock, a landscape pocket park to benefit all which delivers a high quality sustainable urban space that enhances the local context and contributes positively to the broader environmental, social and economic aspirations of the City of London.

The office floor space was designed to maximise natural light and to suit a range of layouts for a variety of occupiers needed over time, with the upper-level set back to provide a series of terraces and green roofs providing valuable garden space and enhancing biodiversity. On the ground floor, retail units, as with the office and culture spaces were designed to be as flexible as possible to accommodate a wide range of potential occupiers and help to create a vibrant destination appealing to residents, city workers and visitors alike. One of the fascinating yet forgotten features that in the 12th century, the Knights Templar Church stood on this site, and it was proposed to enhance this feature as a unique cultural venue supporting the Destination City programme. Drawing on their outstanding sustainability credentials, Make Architects have designed an energy efficient all-electric scheme with passive design strategies to achieve ambitious environmental targets including BREEAM Outstanding and WELL Core Platinum EPC rating of A and neighbours five-star.

In conclusion, it was stressed that Make Architects have worked very hard over the last two and a half years hand in hand with officers and the wider team and extensively consulted with stakeholders to evolve what they passionately believe was an exceptional piece of architecture. It would be an incredible addition to the City and they were very proud of the outcome, and it was very much hoped that Members agreed.

The Chair invited Members to ask questions of the applicant and architect.

A Member referred to one of the features of the current site being a car park which was available to the public and was advertised as such. Why was it that there was no proposal to retain existing car parking? It was understood why the development was car free as that was encouraged, but with it being questioned what the thinking was behind having no car parking and continuing an existing public provision.

Jeremy Randall, from Newark Planning and Development, responded and confirmed that they looked at the car park early on. The car par was not currently particularly well used. There was strong policy resistance against car

parking in this location both at a regional level, as part of the London Plan and as City policy. As such, a decision was taken to omit a car park. It was proposed retaining two blue badge parking spaces. If car parking had been re-provided, there would have been a strong objection from Transport for London.

A Member questioned the reasons why it was decided to increase the height by less than nine metres, bearing in mind that the CGI show that it appears to loom over the skyline behind heritage assets.

James Goodfellow, from Make Architects, responded and referred to the massing on the site having evolved over multiple pre-applications and through lots of analysis around the site. They worked closely with Taverner's, their townscape consultant, and the island site offers and opportunity for a certain mass on this site and bearing in mind some of the key views and the sensitivities around it, the massing was positioned and adjusted through that process. The height was reduced during pre-application, and the position of the mass was adjusted, with most of it being towards the centre of the site, but with it also being towards the northeast part of the site which was facing High Holborn. It was by the Chancery Lane Underground tube station, so it partly signifies the entry and exit and then the massing falls away to the south and towards the west towards the conservation area. It was a process of reviewing all those views and then looking at the architecture and the way in which they can minimise those impacts on the way they break down the mass in the materials that they selected, the colours, the tones and also looking at the extensive greening around the roofscape.

A Member referred to the original buildings refurbishment gross internal area was 36,000 square metres, with this proposal being 54,671 square metres gross internal area. It was questioned whether consideration was given to lowering the building, so it was not interfering with the heritage sites of grade one listed buildings neighbouring and whether it was necessary for it to be so high.

James Goodfellow responded and referred to an uplift of commercial office space on the site. The massing has been set back from some particularly key sensitive views, particularly bearing in mind New Square. The way in which the roofscape has been crafted to minimise this. The height of the building was adjusted multiple times through the pre-application process. They particularly refined the uppermost storey in collaboration with their consultants to reduce the height. Post submission it was reduced and also the finishes and the way the massing up there was articulated was modified to help minimise those impacts. Working with Taverner's, they looked to see where they found the key sensitivities and to really minimise the impact on those.

In response, the Member further questioned whether there was any thought in planning for it to be within the height of the previous building. It was confirmed that there was a bigger opportunity on the site than the existing buildings offered. They have a big courtyard in the centre with no mass. There was an opportunity to infill that and to extend to some extent to the sides. So lateral extensions and then the rooftop levels they do set back. It was 8.3 metres

taller at the highest point but it was also at a similar number of storeys, but the existing building was a very low floor to ceiling height, and so they also need to adjust the floor-to-floor heights.

The Member responded and confirmed that was what they wanted the answer to, with it being the same number of floors. It was ten floors, but because of the low ceilings which obviously undermines the office space as it were, that may be the explanation of why extra space was needed on top. Mr Goodfellow confirmed that the Member was correct, and that given they had the opportunity to infill in the middle, which was where they get the extra area but otherwise it was the same number of storeys.

A Member thanked officers for their comprehensive reference to suicide prevention. The Member referred to the numerous terraces and accessible balustrade rail heights between 1.4 and going up to 1.75 metres and concerns raised by the Suicide Prevention Officer with regards to accessibility and using planters as steps. The suggestion was to change the planting to make it thorny. Given the amount of time, energy and money that has been put into this development to improve the health and wellbeing of the people who would actually be working in there, why would you not increase the balustrade to 2 metres using flush glass panel rather than thorny plants and different heights because that would be a way to guarantee safety on those terraces, rooftops and for the people on the pavement below. It was questioned whether they would consider bearing in mind final details of suicide preventions and balustrade heights being secured by a condition. Could a guarantee be given to ensure that the true health and wellbeing of the occupants of the building and those people on the ground floor and the pavement, that they would raise the balustrade heights to 2 metres, perhaps a glass flush balustrade rather than elaborate thorny bushes and different heights.

Mr Randall responded and referred to it being a balance, with private terraces that would be occupied by either one tenant or a variety of tenants across those upper floors. They have had regard to the suicide prevention guidance, with the balustrade heights proposed being of a generous height. Typically, the 2-metre height was looked at in respect of public terraces. There was a planning condition, and this would be reviewed with officers. It was a balance, obviously wanting to create those generous spaces with those outward looking views. Clearly a 2-metre balustrade height does have an impact on views and the opportunity to provide something a little bit lower in tandem with other measures, whether planting or other measures agreed in tandem with the tenant should provide sufficient mitigation.

A Member referred to it being gratifying to hear the applicant's perception of the City Corporation being welcoming and constructively challenging. The Member asked for more information relating to carbon optioneering, in particular the benefits that have been identified for redevelopment over refurbishment.

Mel Alwood, of Arup, responded confirming that she was delighted to have an opportunity to talk about this as it was something that exercised the team from

the very outset of the design process. The challenge given to them by their client was to identify the best opportunity to deliver a sustainable grade A office development on this site. The carbon optioneering process provided an opportunity to really interrogate a full range of answers to that question, ranging all the way at the outset from light refurbishment all the way to full redevelopment. Early engagement with this was very much supported by the existence of PAN Guidance developed by officers.

This gave them an opportunity to set a framework for that exploration but also and opportunity to articulate and document the journey they went on during the process of establishing the best answer for the project. During the early stages they looked at a very extensive range of opportunities, not just the opportunities set out in the guidance but a range of families of options. Within each of the broad categories that they were given as optioneering, they broke those down and really interrogated the detail of each of those opportunities, particularly bearing in mind the fact that the existing buildings were not a single building but a cluster of related but not connected buildings.

Early surveys and site visits by the team allowed them in particular to interrogate each building individually and the opportunities of each building together. Those allowed them to identify in particular for each site, not just as a whole, what the constraints were to be developing a project that would respond to that initial client carbon brief of a sustainable grade A office building. The constraints that Dr Shuttleworth had identified in his address were consistent across all three buildings. In particular, the restraints around the core of each building that were largely developed in the 60s when fire requirements were very much less stringent than now would have required rebuilding in every refurbishment case that they looked at, requiring significant structural intervention, which turned the dial on the carbon impact of each of the opportunities they reviewed. Additional constraints around the potential wellbeing, floor to ceiling heights, non-uniform grid and differences in slab heights between the three buildings meant that the constraints really precluded the delivery of grade A with the refurbishment option and precluded the delivery of the sustainable outcomes they were hoping for with any of the refurbishment options they looked at. In collaboration with City of London Officers, they identified and incorporated an additional carbon optioneering opportunity and interrogated this for the retention of just the buildings along Southampton Street, but again owing to the requirements of temporary works during the retention of this option, the carbon savings for this retention did not justify the degradation in the health and wellbeing opportunities for the final outcome that had been established. The process was third party reviewed by Waterman's and again it was a very collaborative process and a very valuable process, the results of which were summarised in the circular economy statement that has been submitted with the application.

A Member referred to Knights Templar Church having been founded in 1144 in London, with a retained wall and piece of archaeology having been flagged in the heritage report. The retained wall was in the dome, and it was unclear whether there would be any public access to this unique piece of history to the Chancery / Holborn area. There were mentions to public art that referenced the

history of the Knights Templar in this area. There was the dome exhibition space that would be run by a potential operator, of which the retained archaeology was within that part of the venue. It was questioned whether it would be a private venue and where there was public art if there would be public access to a key piece of archaeology, as has been done in the City in relation to Roman remains etc as part of new commercial buildings.

Mr Randall responded and confirmed that the archaeology would be made available to the public as part of the overall cultural offering. In response to a further question, it was confirmed that with respect to the archaeology, there would be no cost to the public

The Chair invited Members of the Sub-Committee to ask questions of officers in attendance.

A Member remarked on now understanding the need to increase ceiling heights and having the same number of floors. Reference was made to attending a site visit and considering the existing ceilings were low. It was questioned why it was necessary to raise the height of the building when there were going to be two basement levels. It was further questioned whether it was considered to have some office space below ground level instead of raising the height by just under 9 metres, which troubled the Member given the impact on the heritage assets.

The Chair remarked on now starting to retread the same ground on questions. It was also not within the Sub-Committees remit to redesign the building today in the meeting. The application was the one that was before Members today and so he was not going to ask for a response to the question as the answer would be they cannot remodel the building today in time for it to be changed. It was stressed that the Member would need to bear this in mind in their deliberations when deciding how to vote on the application.

A Member raised a question relating to the footway and Holburn Street. An explanation was requested from officers on what effort was made and why they could not get the building line set back a little on Holburn Street. It was understood that the building line was entirely within the ownership of the developer, but with the Member wanting to understand what effort was made and for the future whether it was possible. Even though the pedestrian analysis shows that there was no issue, it does seem a missed opportunity to widen that footway.

In response, it was explained that they had been through a long journey to develop this site. What was accepted on this site was that it was a contextual response to the area. When they considered the existing overhangs, the depth of them were very narrow and would not allow for pedestrians to have a free flow of movement. PCL assessments were part of the transport assessment, and these had come out as acceptable for these types of streets. As such, there was not considered to be a need to widen the footway in this instance.

The Chair referred to pedestrian modelling around the Chancery Lane exit having been completed and having come back as satisfactory, with this being a point that came up from several Members during a site visit.

A Member commented on being concerned about cycle access in the area. There had been a lot of analysis of cycle spaces in the building but the actual routes around it, could it be explained how that gets dealt with in terms of any travel plan or improvements to the highway because it was not clear that any allowance had been made for this. The Member referred to having seen extremely dangerous cycling on Chancery Lane and people going straight through traffic lights owing to the set up at the moment being inadequate. This site was encouraging an enormous amount of new cycling, and it was not showing at the moment any current analysis of this. How was this going to be dealt with?

In response, it was clarified that any cycle related activity would be controlled by the Travel Plan. Members were assured that City Operations have liaised with the London Borough of Camden to improve the contraflow operation. This was currently being assessed as a study, but with this being a more strategic matter outside the remit of this application. The Member responded and referred to cycling being encouraged but at the moment no further funding being put forward for a situation that was clearly not being controlled. With cycling being added to an area where people were cycling against red traffic lights and with Chancery Lane's arrangements needing looking at it would surely be exacerbated and made worse by this development.

It was confirmed that plans were being developed by the City Corporation in co-ordination with the London Borough of Camden. They were aware of the issue and were looking to address it. It was further clarified that there was a cycle hire contribution of £120k that the Greater London Authority had requested.

The Member responded and remarked on it appearing very unsatisfactory that there was a problem that as Ward Councillor he was extremely aware of. This was a development looking to radically change how people get to this building with eight hundred spaces for cycles, surely this can be made part of their travel plan but also any necessary adjustment. It was suggested that this should be something covered by condition. In response, it was further clarified that there would be travel plans secured through section 106 agreement. There would be sufficient cycling education and various measure that would always be secured through the travel plans that would be approved by the City Corporation in due course in that submission. In terms of the impact on the road, it was a matter of law and order and enforcement and cyclists behaving in accordance with the Highway Code. It was proposed liaising with operations colleagues and coming back to Members relating to enforcement action to be taken with colleagues in Camden, and how they can improve the situation in that vicinity. The onus would not be on this development to solve a traffic problem in that area.

The Chairman confirmed the matter would be brought to Planning and Transportation Committee, referring to his recent meeting with the operator

Lime and them providing funding for additional training and enforcement in the Square Mile for their riders. These might be conversations that can be expanded upon.

The Chair moved the meeting to debate of the Members.

A Member echoed the concerns raised relating to cycling, whilst stressing their view that this was a project that Members should be strongly welcoming. The existing buildings on that site were no longer fit for purpose. The proposal Members were presented with today was a very good application, with a building that seems attractive and was in keeping with its surroundings and was seeking to match the buildings that were nearby. It was slightly higher than might have been hoped for, but it was considered to be the right kind of building that was needed in this area. The Member added how they were proud to represent the ward of Farringdon Without, it was the legal district of the City of London. A major international law firm may well want to become the tenant in a building of this type, whereas they would not in the current buildings which were no longer fit for purpose. The Member added that they would be voting in favour of the application.

A Member added that they remained concerned regarding the height and them not having had an answer as to whether the office space could be taken below ground. They were also concerned about the effect on local retail provision. There was an objection from a resident at 7 Holburn who made this point. At the moment, the prioritisation of the business and tourism concerns over the local residents was quite harsh and the Member was very much in two minds.

A Member confirmed that having attended on site and also having completed a pre-app online, that they would support the application. What had been proposed had been very carefully worked through by the applicants and the officers and was way and above better than the existing mesh of three buildings with different floor levels and low office space.

A Member commented on the building being in dire need of regeneration and renewal. A concern was raised relating to suicide prevention. Whilst it might not be classed as a high building, the terrace space was similar to heights at 120 Fenchurch Street, although this was a public terrace. The Member added that if it was possible to do something that was inexpensive but would have a really positive benefit on prevention, why would it not be done at this stage as retrofitting after an incident would be far more expensive, with this having been seen across the City with terraces having been closed to the public for a couple of years whilst works have had to go onto retrofit the problem. The Member noted the British standard was 1.1 metre minimum, with reference being made to Health UK advisory being a minimum of 2.5 metres. The Member urged planners and developers, whilst building new office space, for the health and wellbeing of the occupants to be considered and suicide prevention measures being implemented during the design and build stage. This would not only save lives but would be more cost effective than retrofitting once the coroner issued a note that something has to be done. The Member questioned why we would not be doing this and urged every developer and planning officer in the room to

really listen to the City Corporation's Suicide Prevention Officer when raising concerns that can sometimes get watered down. The Member urged a rethink and to look at how to improve not just the height of the balustrades but also the visual image of the building as well.

The Chair thanked the Member for their comments, adding how he was sure these have been heard by officers and applicants alike.

The Chair concluded the debate and provided brief summary of discussion and consideration of the item. The Chair confirmed the intention to move to two votes. The first vote on planning permission, with a second vote on listed buildings consent.

The Sub-Committee proceeded to vote on the planning application and recommendation before them.

Votes were cast as follows:

FOR – 18
AGAINST – 1
ABSTENTION – 0

Therefore, the recommendation was carried and planning permission granted.

RESOLVED: That Members:

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

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

b) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.

2. Agreed that your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highways Act 1980.

3. Noted that land affected by the building which is currently public highway and land over which the public have right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal

application, officers may proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up plan annexed to this report under the delegated arrangements approved by the Court of Common Council.

4b. **319-Staple Inn Buildings North and South & the Hall, Staple Inn, 335 & 336 High Holborn, London WC1V 7PZ - 24/01247/LBC**

The Sub-Committee considered a report regarding an application for Listed Building Consent that had been submitted alongside planning application 24/01262/FULMAJ for minor alterations to two sets of railings and gates which were located along the eastern and southern site boundary of the Holborn Gate application site.

The Sub-Committee proceeded to vote on the application for Listed Building Consent.

The Sub Committee proceeded to vote on the recommendation before them.

Votes were cast as follows:

FOR – 18
AGAINST – 0
ABSTENTION – 1

Therefore, the recommendation was carried and Listed Building Consent granted.

RESOLVED: That Members:

- Agreed that Listed Building Consent be granted for the above proposal in accordance with the details set out in the attached schedule.

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

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

RESOLVED**:** That, Members:-

- Noted the report and its contents.

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

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

RESOLVED**:** That, Members:-

- Noted the report and its contents.

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**
There were no questions

8. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
The Chair confirmed that there was one item of business of which he was aware. That was to inform the Sub-Committee that the City's Planning Team had once again won a number of awards, this time at the National Planning Awards. These awards being as follows;

- Promoting economic growth
- Best use of heritage in placemaking
- For fostering a healthy town centre
- Planning permission of the year in London, with this being the second year in a row and for the 65 Fleet Street Development

The Chair took the opportunity on behalf of the Sub-Committee to congratulate officers on these well-deserved awards.

The meeting ended at 11.35am

Chairman

Contact Officer: Polly Dunn
Polly.dunn@cityoflondon.gov.uk

PLANNING APPLICATIONS SUB-COMMITTEE
Wednesday, 8 July 2025

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Wednesday, 8 July 2025 at 10.30 am

Present

Members:
Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin KC
Samapti Bagchi
Deputy John Edwards
Anthony David Fitzpatrick
Deputy Marianne Fredericks
Alderman Alison Gowman CBE
Josephine Hayes
Deputy Jaspreet Hodgson
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Timothy James McNally
Sophia Mooney
Deborah Oliver
Deputy Henry Pollard
Deputy Nighat Qureishi
Gaby Robertshaw
Naresh Hari Sonpar
William Upton KC
Jacqui Webster

Officers:

Baljit Bhandal	-	Comptroller and City Solicitor's Department
David Horkan	-	Environment Department
Kieran McCallum	-	Environment Department
Gwyn Richards	-	Planning & Development Director, Environment Department
Alex Thwaites	-	Environment Department
Peter Wilson	-	Environment Department
Polly Dunn	-	Assistant Town Clerk and Executive Director of Governance & Member Services
Callum Southern	-	Town Clerk's Department

1. **APOLOGIES**

The Town Clerk announced prior to the meeting that Alderwoman Jennette Newman had been formally appointed to the Planning & Transportation Committee and, therefore, had also been appointed to the Planning Applications Sub-Committee at the Court of Common Council meeting held on 22 May 2025.

The Town Clerk also noted that Alderman Alison Gowman, CBE, and Alderman Prem Goyal, OBE, had been left off the front sheet in error, and Gaby Robertshaw's first name had also been left off the front sheet in error. The Town Clerk confirmed that a corrected front sheet had been issued on the City Corporation website.

Apologies were received by Matthew Bell, Alderman Prem Goyal, OBE, Alderman Simon Pryke and Hugh Selka.

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

Josephine Hayes stated she would recuse herself from the 55 Fleet Street, EC4Y 1JU application due to ward colleagues having signed a petition in opposition to the development and expressed concern she could be associated with it.

Tana Adkin KC noted she had informed the Committee of her intention to recuse herself from the 55 Fleet Street, EC4Y 1JU application as she had already objected to the application through being a signatory to the aforementioned petition.

Charles Edward Lord indicated that they were a very minor shareholder in Soho House and Company which was, itself, a minor shareholder in Poultry Tenant Limited which had objected to the application. While they felt it was appropriate to abstain, they did not consider it to be a substantial financial interest.

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

The Committee considered a report for a planning application which sought a 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 an external roof terrace.

Officers introduced the application and noted that the site location was based at Old Jewry, but included frontage onto Poultry and Grocers' Hall Court, and was in the vicinity of Bank London Underground station to the east and Mansion House London Underground station to the west. The proposed development was located within the Bank Conservation Area and was in close proximity to the Guildhall Conservation Area. They added that the building proposed for development itself was not listed, but was in close vicinity to other listed buildings which included: the Grade I-listed 27-35 Poultry building which was

The Ned Hotel to the east, the Grade II*-listed 1 Poultry building to the south, and the Grade II-listed buildings at Fredericks Place and 35 Old Jewry to the west. The immediate surroundings included mainly commercial buildings in use which operated as offices, but some operated as hotels as well. The Officers noted there were some residential properties, but they were further afield at Grocers' Hall, Fredericks Place and Mansion House.

Officers presented a view of the existing development site from Poultry at the ground-floor level and stated that the structure was a contemporary Portland stone building, rectangular in design and had a somewhat fragmented ground floor appearance.

Officers presented an image of the proposed development from the east elevation and stated that the proposal consisted of ground floor façade alterations which included replacements to the windows and a rooftop extension. They added that the property was maintain in office use currently but was largely vacant and the proposal sought to reify the office space at a much higher standard in order to bring the asset back into commercial use. Officers added that the east elevation view was from the Ned Hotel, Grocers' Hall side.

An image of the south elevation of the proposed development from Poultry was presented to the Committee. Officers stated it showed at ground floor the proposed amended retail frontage and the proposed removals of the louvers over the existing windows on the third floor and above, and the proposed roof extension and terrace.

The west elevation of the proposed development from Old Jewry and Fredericks Place was also presented to Members by Officers.

Officers presented the ground floor plan to the Sub-Committee and noted that one could see the enhanced office lobby with access onto Old Jewry. Officers noted that the proposed lobby would result in the loss of retail in the principal shopping centre (PSC). However, that had been balanced against the enhanced retail frontage proposed and, as per the office report, it was considered acceptable. Officers added that the proposal included a dedicated new cycle entrance and remaining areas, such as the loading bay and substation, would all remain as is.

An image of the ninth-floor plan on the rooftop was presented by officers to Members. The officers stated that the proposal sought to provide one additional floor of office amenity with a plant enclosure above and the pavilion had been designed to be set within the rooftop as a subservient addition. The proposed impact on the surrounding heritage assets had also been deemed acceptable as per the Officers report. Officers added that the terrace had also been assessed against suicide prevention advice and was considered acceptable following consultation with specialist officers. They informed Members that a condition had been proposed to secure further details if the proposed was approved and suicide prevention measures would be reviewed further by specialist officers.

The proposed tenth floor plan (pavilion roof) was also presented by Officers to the Sub-Committee. Officers noted it was above the office amenity level and the associated green roof would come with the floor.

Officers informed the Sub-Committee that several objections had been received, with the majority being related specifically to the impact on the neighbouring The Ned hotel, specifically the rooftop Members Club. While the objections had been considered in the officer report, they indicated that the applicant had taken concerns raised into account through the submission of amended plans, such as the inclusion of a daylight and sunlight assessment, and an amended rooftop layout. Officers presented the proposed alterations at roof level to Members and stated that the amendments related to the removal of the terrace access door from the eastern side of the pavilion which faced The Ned hotel and the provision of landscaping to reduce any perceived overlooking.

An illustration of the proposed privacy screening facing eastward toward The Ned was presented to the Sub-Committee by Officers. Officers stated that they considered the relationship between the buildings to be acceptable and akin to other commercial relationships within the City. Furthermore, Officers added that while the neighbours had questioned the outcome of the submitted daylight assessment, officers considered the submission to provide a robust assessment. In relation to objections specifically regarding a loss of view, officers noted that while it was not the function of the planning system to protect private view, the case affirmed that views could still be relevant in planning, especially if was a specific public interest to protect that view. In this case, officers further stated that they did not believe there was a specific public interest to protect the view given the commercial and private nature of the property, and the view to the wider inner-city area.

Officers concluded, overall, that they were satisfied with the proposed development in relation to neighbouring properties and the development was considered to have complied with the development plan when taken as a whole and was recommended for approval, subject to the conditions outlined in the officer report.

The Chair asked the Objectors to address the Sub-Committee and invited Mr. Dan Zaum to speak to the meeting.

Mr. Zaum addressed the Sub-Committee and confirmed he was the landlord of The Ned hotel at 27 Poultry. He informed the Sub-Committee that the building was a Grade I-listed building designed by Sir Edwin Lutyens who he stated was a figure synonymous with British architectural excellence and noted that The Ned building was listed with Guildhall and the Royal Exchange as a prominent building in the City. Mr. Zaum told the Sub-Committee that the building was acquired more than 15 years ago and had been restored with considerable care and investment, with the end result being The Ned hotel, a celebrated project which helped redefined the City of London, brought visitors at the weekends and attracted leisure and business visitors alike, as well as top tier retailers. He also added that it turned Bank Junction into a recognised destination for global

hospitality. Mr. Zaum stated that story was now at risk as the proposal before the Sub-Committee would introduce a large rooftop extension at 1 Old Jewry which directly compromised the visual setting and privacy of The Ned, and added that he believed the applicant wished to building a pavilion that a future tenant would use to entertain parties a couple of times a month and would compromise activities at The Ned which took place on a daily and weekly basis throughout the day. Mr. Zaum suggested that the developer did not carry out consultation despite The Ned's role as landlord and the building's clear proximity to the development, and added they would have been easy to locate given the developer's planning consultant was the landlord's property managers. Mr. Zaum told Members that the amendments made since a successful judicial review were minor and failed to address the business' legitimate concerns, especially as heritage experts had found the developer's assessment to be flawed as it dismissed the impact on the roof terrace and ignored the significant of the setting and architecture. He added that the officer presentation, in his view, did not show the actual impact and comparisons of previous nearby roof additions were inaccurate as none were as prominent or intrusive. Mr Zaum informed the Sub-Committee that, in 2009, The Ned was advised by the City that a similar extension on the hotel building would not be supported and indicated he was happy to share the minutes of the 21st December 2009 meeting with Members. He further noted that the guidance received at that meeting had shaped The Ned's approach and investment, and it was difficult to reconcile the precedent set at the December 2009 meeting with current support for the application and queried what had changed since then. Mr. Zaum concluded by urging the Sub-Committee to reject the application, specifically in relation to the pavilion.

The Chair invited another Objector, Mr. Stuart Colin Adolph, to address the Sub-Committee and speak to the meeting.

Mr. Adolph addressed the Sub-Committee and indicated he represented the operator and tenant of the Ned Hotel and was the development director that led the conversion of the former Midlank Bank headquarters between 2013 and 2017. Mr. Adolph stated that the work carried out on that project had altered, extended and restored the building, having worked alongside the City of London planning and design officers who ultimately awarded Mr. Adolph and his team with a heritage award for its conservation which included the creation of the rooftop experience. He added that officers at the time appreciated the importance of connecting views to listed buildings in the City and The Ned rooftop was a popular destination for its members, hotel guests, and thousands of visitors to The Ned who frequented the rooftop each year to enjoy the setting and the historic city environment. Mr. Adolph noted he was made aware of the first planning application at Old Jury when the consent was granted in the first instance, and was asked to examine the impact, in the absence of any consultation from the applicants, by the hotel's managing director. He informed Members he approached the applicant's agenda to find out why they had not consulted The Ned as a neighbourly courtesy and was told that it was a not a major application and that consultation was not necessary. He added that he believed this was against the City of London's guidance and the applicant had ignored the advice given by officers during pre-application meetings. Mr.

Adolph indicated that other options had been suggested to the applicant to allow the extension of their building that would not be as detrimental to the setting of the Grade I-listed Ned and Grade II*-listed 1 Poultry opposite the road, and suggested that the applicant had done nothing to attempt to preserve the setting of the listed building nor to mitigate against the harm perceived by the objectors being done to the heritage assets. Mr. Adolph further told the meeting that he had engaged in further meetings to be told that the large and poorly designed massing on the rooftop was necessary to meet energy and environmental performance targets, as well as to provide amenity space for the applicant's office tenants which would be used relatively infrequently when compared to activity on The Ned roof. He informed Members that he had offered to work with the applicant to explore potential solutions and had identified a number of more sensitive design issues that could be addressed further to limit the impact on the heritage buildings of The Ned and 1 Poultry. The Ned had expressed a preference for extensions lower down the applicant's building and were prepared to concede rights of light in order to preserve of amenity of The Ned and the historic views around the City, and to maintain its connection to St. Paul's Cathedral and other historic landmarks in the City of London. Mr. Adolph stated that the diminution of the settings of The Ned and 1 Poultry were not able to be assessed by Historic England as their lack of resource meant they deferred to City of London design officers who had not made adequate assessment of the relationship and the importance of the listed buildings and conservations areas in which the buildings were situation. He confirmed that The Ned had commissioned its own heritage report, which officers had not presented to the Sub-Committee, that presented the harm perceived to be done to the The Ned building and 1 Poultry across the road, as well as the impact on the Conservation Area. He also added that the quality of the architecture and selection of materials for the extension was of poor quality and the choice was not at all complimentary to the existing building. Mr. Adolph outlined that there was no question that if the current application was approved, The Ned rooftop would become a less desirable place for members, guest and hotel visitors, and while it was hard to quantify the financial impact on The Ned's business, there was a risk it was a significant sum which would undermine The Ned's ability to continue to conserve the important Grade I-listed building. Mr. Adolph concluded that to allow the extension of 1 Old Jewry in the manner presented to the Sub-Committee would not only undermine the decisions of the Sub-Committee in the past, but would also open the door for others who had watched the application closely to further undermine and potentially destroy the setting of heritage assets in the City which had, up to now, been conserved stoically and urged the Sub-Committee to refuse the application and invite the applicant to reconsider their design to avoid the detrimental impact that the extension would bring, and to consult appropriately with neighbours to find a balanced scheme that brought benefits that could outweigh the harm.

The Chair invited Members to ask questions of the Objectors.

A Member queried what The Ned's business model was and expressed interest as to how many members The Ned would stand to lose if the rooftop pool was overlooked and could not be used. Mr. Adolph responded that it was difficult to

quantify, The Ned currently had around 3,500 members and a lot of current users enjoyed the pool. He noted there was also a social membership, a leisure membership, and a wellness membership – those who had a social membership would use the rooftop enormously during the Summer months and throughout the year. He added that the rooftop had been carefully designed to be used all year round which City of London officers in 2015 had agreed was good for the business and The Ned was one of the first in the City to bring the rooftop to the level it was at to capture the immersive view of the City landscape in and around the building, and the connection to St. Paul's Cathedral from the rooftop was a highly significant draw. He suggested that the installation of the two-storey extension at 1 Old Jewry would remove the connection between The Ned and listed assets and concluded that The Ned would almost certainly lose Members as the view from the rooftop often sealed membership deals. Mr. Zaum added that rooftop access also included hotel guests, as well as the 3,500 members.

Another Member expressed concern of the impact on the Grade I-listed building and outlined there were three issues in her view: the height of the proposed pavilion, the surfacing in wood and glass with the green screen, and the overlooking aspect and impact on the view. The Member queried that if the pavilion was shorter, or the facing was completed with a material that matched the contemporary Portland stone, whether the applicants objections be less forthright, or whether a combination of the three issues was a step too far. Mr. Adolph responded that they had reached out to the owners of 1 Old Jewry to suggest they could remove the storey extension so that existing rooftop was no higher than The Ned rooftop was currently. He also indicated that they had suggested potentially looking at alternative ways to replan their plant so it sat in lower parts of the building, and had suggested there were shoulders on the building that could be extended to mitigate some of the floor space the applicant could lose by extending the building in the manner they had chosen to do. Mr. Adolph noted that the applicant had compromised on the reorientation of the windows and some of the access routes. However, that did not help with the amenity that was lost on the roof of The Ned as the materials on 1 Old Jewry were damaging and would contrast significantly and detract from the surroundings. He added it would also lead to little to no light reflection which was an issue given the rooftop was designed to ensure those who used it absorbed natural daylight.

It was noted by a Member that Objectors had made some suggestions to the owners of 1 Old Jewry and queried how far the Objectors had gotten to being able to share a design that ensured both buildings could have rooftop space that complimented one another, was immersive and added to the skyscape of the City. Mr. Adolph confirmed a small workshop was done of the roof of The Ned overlooking the roof of 1 Old Jewry and had suggested that the existing roof level could be used as a deck, and the extensions could have been taken down into lower parts of the building, but that was detrimental to the amount of floor space the owner wanted to create. Therefore, Mr. Adolph suggested, the discussions had were dismissed by the applicant's architect and the applicant themselves.

The Member sought to confirm that the proposal was for the rooftop to be used by office workers and users of the building as an extra facility to enjoy the cityscape, and not to be a permanent event space. Mr. Adolph confirmed Objectors were not denying the use of the rooftop and actively encouraged it as The Ned has its own rooftop and noted it was a clever way for developers to exploit outside space on their buildings, particularly in confined, built-up, areas like the City of London. He added that while they were not opposed to the rooftop being in use, they were opposed to the bulk and mass of the extensions proposed and the ruining of the amenity in place at The Ned. He further noted there was no reason why a staircase could not be created from the lower floor of the office building onto the roof deck and a more appropriately sized extension for plant enclosures be created to the rear of the building.

A Member of the Sub-Committee sought to understand what Objectors had done to engage with the developer and the applicant, and queried what was included in the heritage pack that had been prepared which had not been included in the papers for the meeting. Mr. Adolph confirmed that the heritage study was carried out by Miriam Volic, a heritage consultant, who assessed the setting of the Grade I-listed Ned building, the Bank Conservation Area, as well as 1 Poultry on the opposite side of the road. He told Members that the outcome of Ms. Volic's report stated that the extensions would not be as subservient as the building was currently and the extensions on 1 Old Jewry could possibly begin to dominate the rooftop of The Ned next door. The extensions could also imposed on the viewpoint from 1 Poultry next door. Mr. Adolph stated that while he did not have the report with him, it had been shared with officers and was submitted as an objection letter and in the public domain. Mr. Adolph also suggested that Ms. Volic was concerned with the lack of amenity space and other detrimental impacts on the building such as the loss of retail space, and it was perceived that the harm being done by the rooftop extension to the Grade I and Grade II*-listed buildings adjacent to it did not outweigh the benefits of the scheme. Mr. Adolph also confirmed that the initial consent was taken to a judicial review and, at that point, had engaged with Savills project management team, as well as the planning team, and invited them to a meeting at The Ned. He added that the meeting was on the rooftop of The Ned and queried why the applicants had not consulted with the owners of The Ned, of which they were told that was not to be seen as a major application and consultation was not necessary. Mr. Adolph noted that was in contravention of City guidance and guidance given the applicant by planning officers in pre-application meetings, so The Ned knew nothing of the application initially and the signage installed was not done so in the prominent way to indicate that a planning application had been lodged. Mr Adolph further added that subsequent meetings were carried out following that in which the applicant had tried to respond to some of the concerns that had been raised which included changes to the orientation of the windows, a change to the walked, and the addition of some landscaping and planting to screen their building from The Ned building. However, Mr. Adolph suggested they were intransigent in wanting to reduce the bulk and extra volume that was added to the proposed building and was made clear in the third and final meeting with Deka Group. Mr Adolph indicated he was disappointed not to have been able to influence the design more than had been desired.

The Chair noted that the referred to Objectors report had been part of the background papers.

A Member questioned whether the bulk of the objections raised by the Objectors specifically related to setting privacy and bulk of the proposals as opposed to noise as noise had been factored heavily in the papers and considered whether an analysis of additional noise had been done as he considered Bank Junction to be a noisy area, especially when roof terraces were in use. Mr. Adolph confirmed that the principal objection as specifically around the bulk and mass of the extension and the injury to the listed building and setting of the listed buildings. However, the City, as did other local authorities, had stringent rules on noise control and it was a concern, particularly with regards to the plant. Therefore, it needed to be made sure that background noise checks were done in an adequate way, reported appropriately against the plant and equipment being installed on the roof and, if the Sub-Committee was minded to approve the application, Objectors would have to be very careful in ensuring the submissions came in and ensure that the right representations were made to mitigate the noise. However, Mr. Adolph indicated Objectors were not too concerned about noise from the use of the space as the applicant's use of the space was likely to be less used and in reduced hours compared to The Ned and did not see the amenity of the rooftop being damaging in relation to noise, but just wanted to ensure the plant enclosures were fit for purpose.

The Chair invited the Applicants to address the Sub-Committee and speak to the meeting.

Mr. Price, a senior director at Savills, who was the planning agent who acted on behalf of the applicant, Deka Group, addressed the Sub-Committee and noted that Deka Group was one of the largest providers of property funds in Germany and currently managed assets worth around €50bn, with its UK portfolio currently comprised of 30 assets valuing in excess of £5.5bn, with 86% invested in Central London and currently held nine core assets in the City of London which included eight office buildings, one hotel and the office portfolio was occupied by some of the world's leading companies which included BNP Paribas, Skansa and CMS. 1 Old Jewry was held in Deka's largest fund, Deka Europa, which was represented at the meeting by Marcus Vinkler. He added that the application before the Sub-Committee was Deka's first full building refurbishment in the City of London and formed part of a wider programme of planned investment to ensure its portfolio continued to provide best-in-class accommodation. The proposal sought to refurbish, reconfigure and optimise the building at the site. Mr. Price noted that the floor space had become vacant last year following the relocation of the former tenant Fidessa Group and Deka had proposed a suite of works to bring the floor space back up to date in relation to the quality of the accommodation, amenity provision, sustainable travel and energy efficiency. The proposal also included a small-scale extension at the roof level to create a pavilion and roof terrace, and the enhanced retail floor space at the ground floor. Mr. Price told Members that the strategic focus of the adopted and draft local plans was to retain and enhance the role of the City as

a global office and finance location and noted a requirement by the City for the provision of a minimum of 1.2mft^2 of net additional space by 2040, and there was an increasingly important required to ensure all development was sustainable, with emerging Policy S4 having supported retrofit that upgraded environmental performance. He further stated that the quality of the proposed development would facilitate private sector investment into an existing vacant building to deliver additional and enhanced office floor space and was exactly the type of development envisaged and supported by the plan. The design and operation of the future development also accorded with all detailed planning policies and carefully balanced the requirement to manage impacts while having sought to maximise the opportunities of the site. Mr. Price informed Members that the proposal was developed initially through a comprehensive analysis of the local context, with regard to heritage assets and local views, with input from professional officers at the pre-application and application stage, and the comprehensive analysis of the extension and rooftop level in the officer's report concluded that the additional mass had been sensitively designed and positioned such that it was not visible from any of the local viewpoints. Where it was visible, such as from elevated viewpoints or terraces, officers found that the mass blended into the varied utilitarian roofscape and have a neutral impact. Mr. Price additionally stated that any impact from the additional massing had been further mitigated through the use of high quality materials and had been chosen so the addition was clearly distinct from the original building, yet complementary both to the host and the varied roofscape in the locality. Other physical works to the building would deliver dual benefits of visual and operational enhancements, and the work to the shop front would remove the narrow deep bays to be replaced with wider glazed openings as seen on the images presented by officers. Mr. Price suggested that the original design had significantly impacted the success of the retail floor space and the small loss of retail floor space at ground floor was considered to be far outweighed by the improved shopfront and operational benefits. The alterations to the principal elevations to change windows and removal of the *brise soleil* would create a simplified and more open elevation and would enhance views into and out of the building, and provide an opportunity for the installation of openable windows and natural ventilation in the future. He further added that there were material enhancements to accessibility which included an enhanced office entrance which would include a barrel door suitable for all visitors, as well as a dedicated access for cyclists, along with a significant increase of on-site parking and changing and showering facilities. Mr. Price told Members the proposal would deliver a material improvement to the sustainability credentials of the building, with targeted ratings of BREEAM 'Outstanding' and NABERS five-star and noted that there had been a number of third-party objections from The Ned hotel. However, according to Mr. Price, the applicant had engaged closely with the operator given the sensitivities raised with regard to private member use and, despite officer satisfaction with the proposal, the applicant had agreed to make amendments to the layout and design of the terrace to restrict any potential overlooking, and the access point had been relocated to the opposite side of the building and would only be used as a fire escape route. Mr. Price concluded that, while not a policy requirement, the applicant had also assessed the impact of light afforded to hotel terraces and rooms and there

was no impact to the terraces and very limited levels of impact to any of the hotel rooms.

The Chair invited Members of the Sub-Committee to ask questions of the Supporters.

The Deputy Chair sought clarification on the level of engagement undertaken by the applicant given the City had issued developer engagement guidance which was shared with all developers, especially as comments had been made that very little engagement had been had. Mr. Price indicated multiple phone calls and conversations had been had with neighbours at The Ned, including three formal meetings and had been through the development in some detail and, as had been suggested, alternatives were presented which were considered but, unfortunately, the alternatives were not commercially viable and were weighted toward the aspiration of The Ned hotel. Mr. Price stated that to suggest the applicants had not engaged or listened was unfair as they had met multiple times with neighbours on their property and elsewhere, and there had been a significant attempt to work with them. He added Deka, as the applicant, understood that it had to be a neighbourly partner and wanted to protect private member use as best as possible whilst not losing an opportunity for the site.

A Member asked the Supporter to expand upon the proposal's sustainability credentials and queried whether air source heat pumps were being installed. Mr. Price confirmed there were improvement works planned to examine all aspects of operational energy efficiency which included a replacement plant and air source heat pumps.

The Member followed up and queried whether the heat pump replacement involved any space on the roof. Mr. Price confirmed that it would be in the enclosure of the plant screen.

Another Member queried what the capacity of the terrace and the height of the balustrades were on the seventh floor. Mr. Price responded that he did not believe there was a fixed occupational maximum number on the terrace, but he believed it was planned to be approximately 150 persons. In relation to the balustrades, Mr. Price stated they were set at 1.4m for the roof terraces and noted there was a condition tied to planned works which led to the establishment of a protection process, including CCTV and the design of the terrace, specifically in relation to where furniture would be placed.

The Member questioned why the hours were set from 8:00am until 11:00pm given it was an office building. Mr. Price noted that it was not intended to be an event space that went beyond the use of office hours and indicated that if there was a feeling from Members was inappropriate for the location, he had no doubt the applicant would reconsider the opening times.

A Member drew attention to a report which was prepared in opposition on behalf of the tenant and freeholder by MVHC which suggested that the proposal failed to preserve or enhance the character of the relevant heritage

assets and their settings and, therefore, contravened the requirements of the NPPF, and queried whether the Objector was correct and whether the alternative proposals could be outlined that were considered for the rooftop space. Mr. Price responded that there was a heritage assessment by Montagu Evans was provided as part of the application which produced a very different conclusion to the one produced by MVHC. With regard to the alternative options presented by The Ned hotel, Mr. Price noted they included staircase to the roof terrace which was not accessible or appropriate and if there was going to be a roof terrace, more massing was required which was why he believed the proposals were not commercially realistic. Mr. Price further added that, in relation to the height and whether one felt it should be a different level of ambition, there was a condition related to materiality and, if it was felt that a lighter finish stone or a cladded finish was more appropriate, it could be dealt with through the application of the condition.

A question was raised by a Member as to why the proposal sought to reduce the retail space by 30% and turn three units into one unit given the importance of Cheapside as one of four PSCs of the City was recognised by the Supporter. Mr. Price responded that all the retail floor space was vacant when the previous office tenant left the building and one saw from the images that it was a harsh and dense retail frontage which had slit windows and an oblique view which had made it difficult for one to retail out of the floor space. Therefore, what had been proposed was a suite of works at ground floor to enhance the functionality of the retail floor space so there was a reduction of approximately 150m^2 of floor space. He added, however, that in relation to reactivating and bringing the floor space back into use, the proposal had much greater benefits and would be to the betterment of Cheapside PSC than the floor space as it existed.

It was considered by a Member whether thought had been given to The Ned when the proposal was being designed. Mr. Price explained in response that the first phase was a full assessment of the local context, and was not explicitly concentrated on The Ned, but other heritage assets such as 1 Poultry, Grocers Hall Court and Fredericks Place. He added that time had also been spent with officers walking the area and the proposal had been designed to be cognisant of the vantage points.

The Member noted that The Ned was a Grade One-listed building and queried whether the applicants had visited the rooftop of the building to understand the skyscape. Mr. Price stated there was a full understanding around the vantage points, as well as the localised views, and a full assessment had been undertaken of all the viewpoints. He added he agreed with the assessment that some buildings had greater status and weighting, but the assessment had started by looking at everything to develop a scheme which was most appropriate for the site and then looked at the sensitivities of the listed buildings.

The Member also queried whether the terrace was for people to move up to the roof to use it and whether it was to be used as an event space. Mr. Price stated that the pavilion space was the arrival space at the top of the building to access the roof terrace, but there was no formal cover for that terrace and was not

intended to be an event space or something that went materially beyond its amenity space associated with the office function.

The Member questioned whether an alternative could be installed at the rooftop that would potentially have been better for the skyscape. Mr. Price stated there was a requirement to have plant equipment on the rooftop, a requirement for access for all, including lift access, and there was a requirement to have a form of arrival space which was part of what had driven the operational changes to the building which helped to deliver wider benefits in relation to sustainability and enhanced access. He added, therefore, that the space created on the rooftop was part of the overall proposal and was critical to how the project was delivered.

Concern was expressed by a Member about the applicant's relationship with their neighbours as it seemed like the potential for nuisance could potentially be created and sought to understand whether it was offices or something different that was being offered. Mr. Price responded that it was office space, and the amenity function was associated with the office building and would only be used by employees or visitors to the offices. Mr. Price also added that, in relation to the relationship to neighbours, the applicant had looked at reduced overlooking by changing the window design and the access points. Green screening had also been proposed to minimise overlooking and the layout of the terrace had been changed so there was no dwelling space directly adjacent to the Ned. Mr. Price noted that The Ned themselves had said they were not necessarily concerned about the use of the floor or the floor space as a terrace and, therefore, did not believe there was any risk of the use of the roof terrace becoming a nuisance.

A Member sought clarity on whether the roof terrace was attached to a particular office floor or was to be utilised by the whole building, and queried whether the pavilion would have any toilets in the area if it was an arrival space. Mr. Price confirmed that the space would be available to all tenants on all floors, regardless of whether a single occupier took the whole building or not, and while the pavilion space was an access point, it would have set down areas and toilets to enable to service both the pavilion space and the roof terrace.

The Chair invited Members of the Sub-Committee to ask questions of officers in attendance.

A Member asked whether the green screening proposed was part of a condition. Officers confirmed that there was a landscaping condition which also covered the long-term maintenance.

The Deputy Chair drew attention to comments by the Objector in relation to a lack of signage visible at street level and sought confirmation that the statutory consultation process had been undertaken as the Objector had indicated they had received no notification from the City about the planning application. The Deputy Chair also sought to understand how much weight was to be given in planning terms to a private terrace's right to a view. Officers responded that there was a substantive table illustrating the consultation process for the

application in the report which had included re-consultations, various site notices, city notices and letters to neighbouring occupiers. Therefore, Officers felt that the consultation process had been completed successfully. In relation to the loss of view for the neighbouring property, Officers explained that while there was no private right to a view over another property, it did not necessarily mean that it was completely irrelevant in planning terms. However, it was up to the local authority to decide how much weight to give the view and whether there was a public interest in the protection of the view that the current occupier enjoyed. They added that as there was a urban context in relation to that view and, while limited weight had been given to the view in the office report, it was not considered that protecting the view was in the public interest.

A Member drew attention to a previous comment made by an Objector that they had been told in 2009 by the City that a similar extension on The Ned was not permitted and queried what had changed since 2009. Officers explained that there were negotiations about alterations to the Grade One-listed building and suggested the advice may have been at the time that the roof extension of the Grade One-listed building was not acceptable. However, Officers had not had sight of the correspondence related to that case. Officers added that Members were asked to consider the merits of the proposal's design, and the officer report had been clear that they did not see heritage harm related to the impact of the development and that the design itself was considered acceptable.

A question was raised on the screening by a Member as to whether it was hard or green screening. The Member also queried whether a greater use of roof terraces would be encouraged given the proposal. Officers explained that if there was any damage to the planting, it would be replanted. In relation to the roof terraces, Officers explained that policy DM10.3 encouraged he use of roof terraces. They added that the existing rooftop had been considered be design officers to be an appropriate addition to the existing building and, on that basis, had been assessed as acceptable in policy terms.

A Member expressed concern about the 11:00pm end to the operating hours of the building, especially in relation to the suicide prevention SDP and while there was CCTV, there was nothing to actually prevent a suicide other than a higher balustrade, and it being used as an office space made no difference. She further added that she wished to see the balustrade raised and suggested not to leave it as a condition on its own. Officers responded that the application had been assessed against the preventing suicide advice note and had been considered acceptable as the balustrade was 1.4m when building regulations had set it as 1.1m. Officers added it had also been stepped back from the edge of the building and there were existing terraces below the building which would deter incidents. Officers confirmed that it had been assessed as part of the application that the condition sought to request further details on how the best management scheme could be secured in perpetuity.

Another Member sought to understand the process for how the material of the massing could be changed after an acceptance of the proposal before the Sub-Committee. Officers confirmed that condition samples would be submitted and would be considered ordinarily under the Scheme of Delegations.

It was raised by a Member whether officers would consider conditioning the use of obscured glass on the side of the pavilion facing The Ned from floor to ceiling or a solid side to the pavilion. Officers responded that in consideration of the overlooking impacts, they had to bear in mind that there were two commercial elements looking one another and how much weight they were given. However, while the hotel was given weight as people were expected to be there, it was also a transient use and the office use was also certain times of the day, and was a relationship that was common in the city. They added that there were multiple hotels within close proximity to office space and had assessed the proposal on the basis of it being acceptable because of the precedent and the commercial relationship. Officers further noted that what Savills and the applicant had proposed as amendments were not specifically requested by officers, but put forward following objections submitted by third parties, and now it had been out forward, officers confirmed they would look to secure the amendments within conditions. Officers suggested, therefore, that it was something examined within the officer report and had considered the relationship to be acceptable. Officers also cautioned against trying to design a scheme, especially as they were content with the green screen proposed by the applicant as it added to urban greening and a number of benefits outlined in the report, and roof terraces were a big dynamic of attracting occupiers to the City and suggested it would be difficult to let out buildings without external terraces. They concluded that it was typical to have external terraces close to other external terraces within commercial uses.

The Chair moved the meeting to a debate of the Members.

The Deputy Chair stated that there was a risk of losing perspective as there was an issue in the Square Mile with the provision of Grade B office stock being put to good use and a vacancy rate that was about 10% across Grade B office stock. He added that the proposal was a deep retrofit which retained 95% of the carbon for a 10% uplift in office space which was a relatively small addition of 100 extra employees, with the building only being able to locate 600 employees. The Deputy Chair also expressed concerns that a private hotel terrace with a membership of 3,500 was being discussed in relation to an office block of 600 employees when one considered how many could fit onto the roof terrace at one time that would cause a disturbance which he did not believe made sense. He added that the Sub-Committee needed to be mindful that the delivery of a NABERS five-star office building with a BREEAM rating of ‘outstanding’ delivered on the City’s Sustainability SPD and that needed to be considered more than design features. The Deputy Chair confirmed he supported the scheme as it stood.

Another Member stated that the existence of a private pool on a roof preventing adjacent buildings from not having terraces was not a good precedent to set and added it was normal to have pools being overlooked by buildings in hot countries such as Singapore or Thailand. The Member also suggested it was odd that Historic England had not responded to the application if they were concerned given they did usually respond. He also told the Sub-Committee that the installation of air-sourced heat pumps and replacement of gas boilers was

important and required rooftop space. He added, in relation to green screening, that the Sub-Committee should encourage applicants to plant on roofs and felt the scheme was positive.

It was stated by a Member, who noted she had attended a site visit, that the roof as it currently stood was a sad site at present and fully supported the idea of bringing it into use, but expressed concern about the two storey upward extension, the look of it and the effect it had on the Grade One-listed building next door and it was something that the Sub-Committee ought to be concerned about and did not understand why a more sustainably friendly scheme had not been proposed. The Member added that there was another rooftop garden just below the proposed rooftop terrace and regretted that the proposal had not been for another rooftop garden rather than the upward building of two storeys. The Member further stated that, while she welcomed the installation of air sourced heat pumps, she was not satisfied that there had been sufficient consideration of how that could be accommodated on the roof at the top or on a lower roof and did not feel it was good enough at the moment.

Another Member indicated that focus on the rooftop terrace had occurred as that was where the objection had been directed and noted the obligation the Sub-Committee had to consider the impact on a Grade One-listed building that would be there long into the future. She stated that granting permission for a structure that could be perceived as a shed on top of a building that changed the city skyscape was setting a precedent and was what planning did. The Member also considered the precedent when other buildings sought planning permission for two more levels and suggested that if the wellbeing of office workers was being considered in relation to a terrace, two extra floors on top, in her view, were not needed and confirmed she would not support the application.

The Chair reminded the Sub-Committee that a decision on the application was to be taken today on its own merits and was not to consider how it would affect future schemes.

A Member stated that Members had to remember that Historic England had left the decision up to the Sub-Committee as was often the case with smaller schemes and suggested that the fact Historic England had not commented was irrelevant. The Member also added that if the City, through encouraging Destination City, and expecting hotels and other uses to come in and supplement City businesses, then the Sub-Committee had to take account of what was happening at roof level. He told the rest of the Sub-Committee that it seemed to be a bulky two storey extension that was not just a terrace as it had an actual built structure and the roofscape on top with the plant would have an adverse impact and would likely also adversely affect the Conservation Area and adjacent listed buildings. He concluded that he did not believe the design met the high standards that the location expected and did not feel the proposal was good enough.

Another Member indicated he was a supporter of retrofitting but expressed concern as to whether the rooftop terrace was fit for purpose in its current plan

as it was not sympathetic to the surroundings and did not feel due consideration had been given to the design. The Member added that he acknowledged it was not the Sub-Committee's role to design, but he suggested more thought should have been given to the sympathetic nature of neighbouring buildings, including The Ned, and cautioned, when talking about Destination City, disregarding a functioning hotel that had an attractive style and the around 3,500 members at The Ned. He also stated he was concerned at the lack of engagement and neighbourliness from the developers and a lack of due consideration for potential alternatives, especially as there had been no explanation as to why other potential alternatives were not commercially viable. The Member advised the applicant to defer the application to work on a more sympathetic alternative or he, otherwise, would be unable to support the application as it stood.

The Sub-Committee was addressed by a Member who informed that she walked past the existing structure every day and believed it had become an eyesore but initially was well utilised when the structure first opened with retail units before the company went out of business. She stated that the structure desperately needed a refurbishment, and a retrofit was the best way to achieve that. However, she expressed concerns on the operating hours of the roof terrace as it could encourage a greater use which would have a greater impact on The Ned and 1 Poultry, and indicated she did not support the 1.4m balustrades on a 9 storey building as the only way to stop someone potentially going the edge was to high a rail high enough to completely deter. She also added she did not believe a fall from two floors from ninth to a seventh floor balcony would be enough of a deterrent and wanted to ensure that the City took its responsibility seriously in designing out suicide. The Member also suggested she was equally concerned for hotel guests at The Ned with regard to noise, and agreed with previous points made that Historic England had entrusted the decision to the City. She concluded that she believe the main issue was the rooftop area and, with the imagination of an architect working alongside neighbours of 1 Old Jewry and with planning officers, a design could be created that was fit for purpose, would be safe and not have a detrimental impact on neighbours. The Member, therefore, indicated she would vote against the granting of the planning application if the application was not deferred.

Regret was expressed by a Member that, 20 years after the building had been agreed by a previous planning committee, it was no longer viable and expressed concern that other such proposals to retrofit would not come along if the proposal was not agreed as the same issues were likely to be raised regardless of who came along. The Member indicated he did not believe there was any heritage harm and urged the Sub-Committee to focus back on the building itself and whether it gave viability to the City. The Member suggested he would support the approval of the planning application.

Another Member stated that the Sub-Committee's role was not to question the design of applications submitted, but to make sure the process had been adhered to in the granting of planning permission and indicated he was satisfied that it had been. He added that he agreed with the principle raised that a situation could not arise whereby a user of the building had decided to utilise

their roof in a particular way and, therefore, prevent others in adjacent buildings from doing similar. In relation to the swimming pool, the Member suggested that if one was worried about being overlooked, they may wish to choose a swimming pool not in the middle of the City of London surrounded by skyscrapers. He added that the business model of The Ned private members club having around 3,500 members indicated, in his view, that exclusive use of such a facility was not particularly high on the list of priorities and suggested officers had done a good job to weigh up the different pros and cons of the application. The Member further added that he agreed with a previous point made in relation to suicide prevention, but stated he was unsure that a drop of two storeys merited the same level of barriers and protection as would usually be warranted.

The Chair brought the debate to a close stated the Sub-Committee had heard somewhat contradictory statements on the issues of consultation and engagement and Members has raised the issue of heritage impact, and the influence it could have over the views of a Grade One-listed building nearly. He added that Members had heard that officers placed relatively low material weight on the dilemma related to views from the private members club as it was not a residential or public space and was, therefore, relatively low ranked in their deliberations. The Chair noted that the issue of suicide prevention had been raised by Members and suggested the application appeared to be compliant with the City's SPD suicide prevention and felt it was difficult to complete design away suicide in any building. The Chair also suggested the Sub-Committee potentially strayed too far into attempting to co-design the shape, look and feel of a building and stated that officers had to weigh things up against one another within the National Planning Policy Framework and the City Plan and officers were content with the application which was why they had made the recommendation to the Sub-Committee to support the application. The Chair indicated he would support the officer recommendation to grant approval of the planning application.

The Chair moved the meeting to a vote on the planning application.

The Sub Committee proceeded to vote on the recommendation before them.

Votes were cast as follows:

FOR – 12
AGAINST – 9
ABSTENTION – 1

Therefore, the recommendation was carried.

RESOLVED – That, Members:

- Granted Planning Permission for the above proposal (1 Old Jewry) in accordance with the details set out in the attached schedule in the main report pack.

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

Tana Adkin KC and Josephine Hayes formally recused themselves and left the meeting as per their declarations at the beginning of the meeting on the item.

The Sub-Committee considered a report which sought a change of use at 55 Fleet Street, EC4Y 1JU from Class E offices to *sui generis* Adult Gaming Centre, across ground floor and part basement levels.

Officers introduced the application and presented the site location plan which noted that the site was on the south side of Fleet Street itself, with Pleydell Court which ran along its eastern elevation. Officers added that there were also residential properties nearby directly to the west at 53 and 54 Fleet Street and to the east at Plato House, as well as residential properties in the wider area on the north side of Fleet Street at Bolt Court and Red Line Court. The building was also located in the Fleet Street PSC. Officers informed Members that the application was for a change of use at the ground floor of 55 Fleet Street and part of its existing office use to use as an adult gaming centre, the proposed hours of use which were 24 hours a day, 7 days a week. Officers stated they had consulted nearby, erected sign notices, and issued a press notice as well given its location within a Conservation Area. Officers noted they had received 24 letters of objection and a petition in objection with 186 signatories. Officers confirmed that the proposal was recommended for refusal on four grounds.

Officers presented the existing elevations to the Sub-Committee and their existing use as offices across all levels at the basement, first, second, third, and fourth floors, and there were no changes proposed externally. They also presented the existing layouts for the proposed floors subject to proposed changes and noted there was office floor space on the right-hand side on the existing ground floor and the connected basement on the left-hand side. Officers also noted there was a secondary entrance onto Pleydell Court on the eastern elevation.

Officers presented the proposed plans to Members and stated that they showed the adult gaming centre on the ground floor on the right side with two rows of gaming machines which were connected to its rear by a set of stairs to staff welfare facilities and to customer toilets on the basement level.

Officers reiterated that the application was recommended for refusal on four grounds which incuded the proposed loss of office floor space without requisite viability of market evidence as required by City policy and its office-use SPD which was exacerbated by the loss of such office floor space which would prejudice the use of office door space on the floors above which was not subject to the application. The second reason was that the proposed use was not considered a retail use and would have a physically and visually impermeable and inactive frontage which would therefore cause harm to the Fleet Street PSC and was a particular concern given that Plato Court ran along the eastern elevation which was already not very well overlooked or surveyed and, therefore, would be exacerbated by the proposal. Officers continued and stated that the third reason for refusal was that the lack of active frontage and the highest risk profile of the use proposed and reduction in activity would lead

to security and safety concerns of which the application and proposal itself had not demonstrated had been designed to be a safe and secure space, or maintain and enhance the safety and security of the surrounding area. The last reason for refusal related to information missed from the proposal for Officers to make a determination or judgement on what would typically be required of such an application on the impact of noise and disturbance to nearby residents and harm to residential amenity of which there had been little information or detail provided on safety and security measures, as well as details on operational management, servicing and waste.

The Chair informed the Sub-Committee that no Objector or Applicant had registered to speak, but a Member who was not a Member of the Sub-Committee had applied to speak for up to 5 minutes as per the Planning Protocol.

The Chair invited Alderwoman Martha Grekos to address the Sub-Committee meeting.

Alderwoman Grekos of Castle Baynard ward informed the Sub-Committee that she endorsed the recommendation for refusal by the planning officers as the application was contrary to planning policy, specifically with regard to undermining of Fleet Street as a PSC, contrary to the environmental amenity needs of the area for both workers and residents given the 24/7 operating hours which the City of London Police had also indicated they did not support, and was likely to create a heightened risk in antisocial behaviour as there was a lack of active frontage which did not comply with secured by design principles and there was no detail for staff welfare. The Alderwoman stated that the report correctly analysed the impact of the development proposals against current and emerging policies and agreed with the assessment and noted that the harm that such a development would cause to the area. The Alderwoman added that the four reasons indicated for refusal were sound and noted her ward had been undergoing significant transformational change, with Fleet Street meant to be thriving in the next few years as a legal quarter mixed with residents, banking, insurance and accounting industries with retail and hospitality to match the consumers. Alderwoman Grekos thanked fellow Castle Baynard Common Councillors who had campaigned before their election to the Court and submitted the petition of 186 signatures from constituents in the ward. Alderwoman Grekos further added that one could see Castle Baynard constituents were against the proposals and there had been no single submission in favour of approval. She further stated that the reasons stated in that letter had been picked up entirely in the assessment and indicated she was grateful to planning officers for taking them into consideration. Alderwoman Grekos urged the Sub-Committee to approve the recommendation of refusal of the change of use application.

The Chair moved the meeting to questions of the officers from the Sub-Committee.

A Member sought an explanation as to whether officers were able to raise their concerns with the applicant about the lack of information identified and how had

they responded. Officers explained that they would typically ask for small scale amendments or specific information if they thought that, overall, the application was supportable. However, in this circumstance, the principle of development was not supportable and, therefore, Officers confirmed they did not ask for all the information at the start of the process as the application was invalid. Officers further stated that they did ask for some detail and the applicant had provided information on how the basement would operate. Officers added that the stairs at the rear of the premises were not part of the application as they needed to remain shared between the proposed use and the use on the upper floors. Officers concluded in response to the question posed by the Member that as refusal was recommended, the applicant was not given the opportunity to provide all the information listed in refusal reason four.

The Chair moved the meeting of the Sub-Committee to a debate on the application.
A Member stated he was surprised at the lack of information provided and was conscious that most adult gaming centres sought to locate themselves in city centres and town centres. He added he was glad that officers had judged that the application could not be supported even if further information had been provided.

The Chair moved the meeting to a vote on the change of use application.

The Sub Committee proceeded to vote on the recommendation to refuse before them.

Votes were cast as follows:

FOR – 17
AGAINST – 0
ABSTENTION – 0

Therefore, the recommendation was carried.

RESOLVED- That, Members:

- Authorised the Development Director 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. 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).

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

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

A Member raised a question with regard to Cripplegate House on One Golden Lane where a number of planning conditions had been mentioned and sought assurance that the noise experienced from One Golden Lane was not going to be further worsened by the planning conditions applied. However, the Member indicated she had received assurance in the morning that the planning conditions would not affect noise on the site. Officers confirmed that the conditions were related to detailed design of various aspects of the scheme and were not related to construction impacts.

RESOLVED – That, Members:

- Note the report and its contents.

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

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

RESOLVED – That, Members:

- Noted the report and its contents.

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

No questions on matters related to the work of the Sub-Committee were raised at the meeting.

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

The Chair informed the Sub-Committee meeting that the Planning team had won an award for innovation in placemaking for the City's thermal comfort modelling and guidelines, and had also received a commendation for the City's free-to-visit elevated public areas initiative at the Adept Awards the week before and congratulated the officers.

A Member raised concerns on letters of consultation and time taken to receive them as she had personally received a letter that had given her 28 days to comment and 14 days to reach her. The Member stated that it needed to be ensured that if second class post was going to be used, the consultation period either needed to be extended or the post hand-delivered, especially as re-consultation periods were shorter. The Chair asked officers to provide a response to the comments raised.

The Member also queried as to what applications were likely to come forward for the 17 June meeting of the Planning Applications Sub-Committee. Officers suggested it was likely to be a case of Holborn Gate, and an associated case in St. Andrew's Place for a change of use.

The Chair formally concluded the meeting.

The meeting ended at 12:23

Chair

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

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Committee:	**Date:**
Planning Application Sub-Committee	30 September 2025
Subject: 130 Fenchurch Street London EC3M 5DJ Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.	**Public**
Ward: Langbourn	**For Decision**
Registered No: 25/00529/FULEIA	**Registered on:** 17 April 2025
Conservation Area: No	**Listed Building:** No

Summary

i. The proposal is for the demolition of the existing building at 130 Fenchurch Street, 'Fountain House' and the phased redevelopment (and optimisation) of the site in the form of a new 34 storey tower.

ii. No objections to the proposals have been received from statutory consultees.

iii. The loss of the existing building is unobjectionable on carbon and heritage grounds and planning permission for the redevelopment of the site has already been granted several times, most recently in 2016 and 2020.

iv. Located in the heart of the City Cluster, the proposed tower would be a mixed-use development, chiefly providing grade A, best-in-class office accommodation (c.43,500 square metres) and interlinked cultural and public spaces at ground and levels 17 and 20. As such, the proposal would contribute significantly to the City's strategic economic and cultural objectives and Destination City agenda.

v. Aesthetically, the proposed tower would be an adornment to the skyline. It would fit neatly into the City Cluster as existing and envisaged. It would meet the required standards of urban, sustainable and inclusive design and would have a uniquely jewel-like architectural character. Locally, the proposals would significantly improve the ground floor presence of the application site, particularly in relation to the neighbouring Fen Court garden and former churchyard; conditions have been attached to optimise the site's archaeological potential.

vi. The application is for an EIA development and is accompanied by an Environmental Statement (ES). Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and the proposal considered acceptable. The local environmental and amenity impacts would be modest, are considered acceptable and the proposal would raise no issues in respect of highways or transportation. Similarly, there would be no impacts upon strategic views or heritage assets and the carbon optioneering exercise has been satisfactorily conducted and is consistent with the proposals.

vii. The scheme would provide benefits through the community infrastructure levy (CIL), improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S106 agreement.

viii. Overall, the proposal would suavely optimise the potential of the site, advance the strategic and business objectives of the City, and comply with other relevant design, community, culture, environmental and public realm related policies.

ix. As the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, officers recommend that planning permission should be granted as set out in the recommendation and the schedules attached.

Recommendation

(1) That subject to the execution of an agreement to secure planning obligation(s) and other covenants under Section 106 of the Town and Country Planning Act 1990 and s278 of the Highways Act 1980 in respect of the matters set out under the heading 'Planning Obligations', and recommended conditions of development, the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached Appendix C, the decision notice not to be issued until the agreement has been executed.

(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and Section 278 of the Highways Act 1980.

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

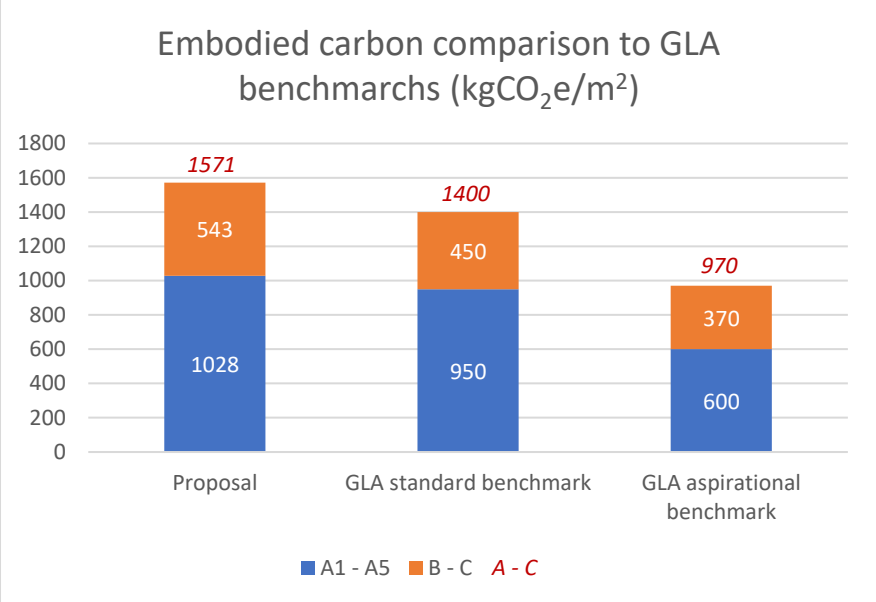
(4) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

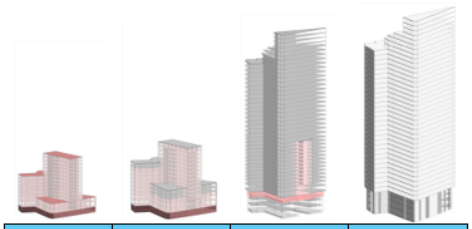
Application Cover Sheet

25/00529/FULEIA - 130 Fenchurch Street London EC3M 5DJ

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	68.35m AOD		161.46m AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Use Class E (Office)	13,957 sqm	57,491 sqm	
	Culture	145 sqm	569 sqm	
	Public Viewing	0	644 sqm	
	Flexible Retail	193 sqm	370 sqm	
3. OFFICE PROVISION IN THE CAZ	57,491sqm (excluding plant)			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	28		3,610	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	20	Car parking spaces	1
	Cycle long stay	0	Cycle long stay	860
	Cycle short stay	0	Cycle short stay	48
	Lockers	n/a	Lockers	860
	Showers	n/a	Showers	72
	Changing facilities	n/a	Changing facilities	72
6. HIGHWAY LOSS / GAIN	No net change.			
7. PUBLIC REALM	316sqm of permissive path provided. Enhancements include: • Widened pedestrian space,			

	• New street trees, and improved connectivity • An east-west pedestrian route is proposed between Cullum Street and Fen Court. • Shared surface along Cullum Street	
8. STREET TREES	EXISTING	PROPOSED
	0no. (within application boundary) 2no. (within adjacent highway land on Fen Court)	2no. (within application boundary) 1no. (existing retained tree within adjacent highway land on Fen Court)
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	31	99 (allowing for consolidation)
10. SERVICING HOURS	Between 23:00-07:00. This restriction does not apply to cargo bike deliveries (plus exceptional deliveries arranged ahead of time).	
11. RETAINED FABRIC	0% retention of structure	
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvement against Part L 2021: 12% GLA policy target: 35%	
13. OPERATIONAL CARBON EMISSIONS	90,276 tonnes CO_2e over a 60-year period 1,298 kgCO_2e per square meter (includes life-cycle modules B6 & B7)	
	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS	

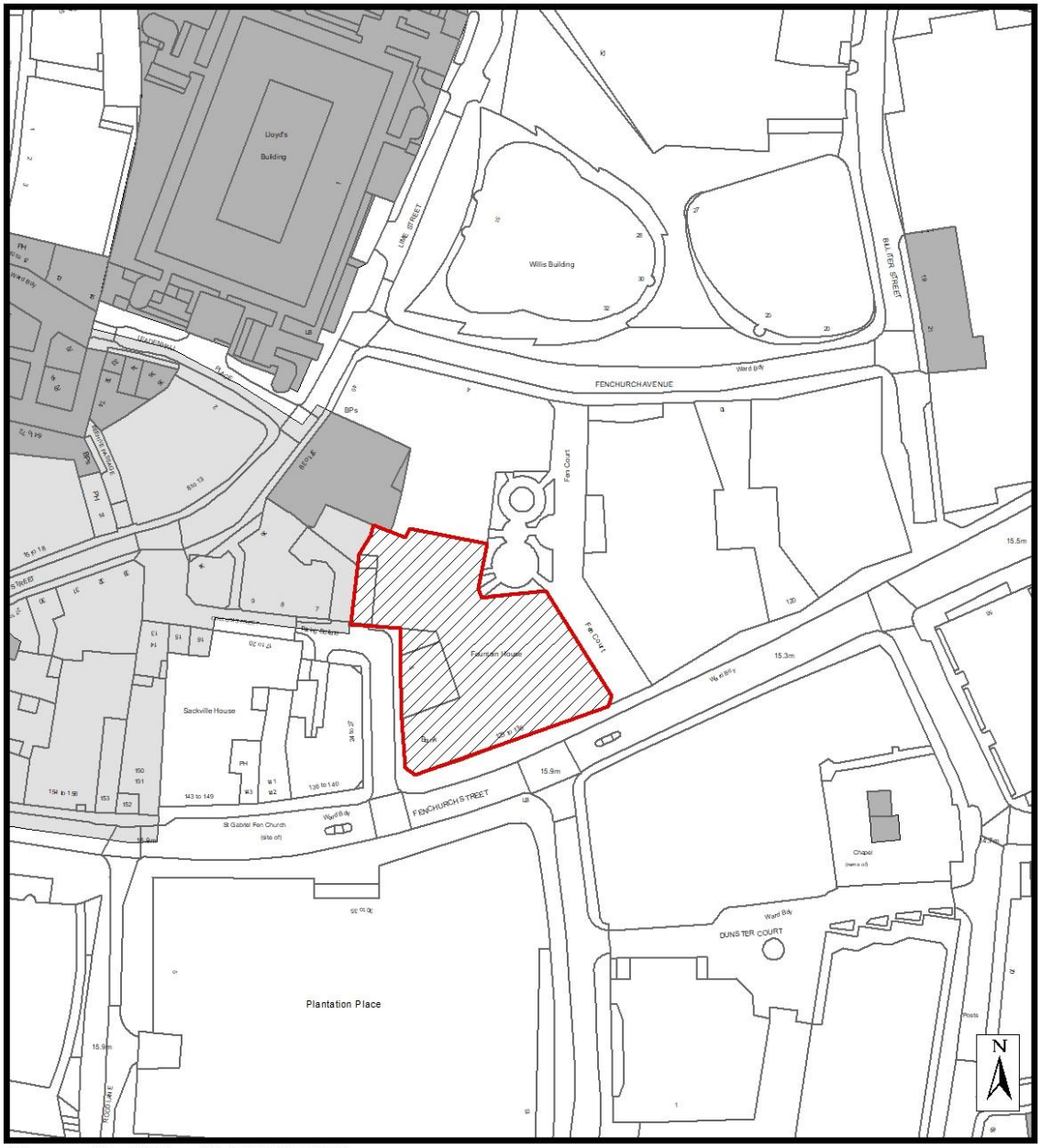
14. EMBODIED CARBON EMISSIONS	 Upfront embodied carbon (A1-A5): 71,522 tonnes CO_2e / 1,028 $kgCO_2e$ per square meter Embodied carbon (A – C): 109,259 tonnes CO_2e / 1,571 $kgCO_2e$ per square meter
15. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)	Total WLC (embodied and operational): 199,535 tonnes CO2 / 2,869 $kgCO_2e$ per square meter.
16. CARBON OPTIONS ASSESSMENT	CARBON OPTIONEERING

- LIFE-CYCLE CARBON EMISSIONS	

	Option 1	Option 2	Option 3	Option 4
Gross Internal area (GIA) m²	13,408	17,498	73,115	70,771
Increase in NIA (over existing)	0	3,068	33,936	37,124
Substructure % retained (by mass)	100	100	50	0
Superstructure % retained (by mass) (*frame, upper floors, roof, stairs, ramps*)	100	100	43	0
Superstructure % retained (by area) (*external walls, windows, external doors*)	0	0	0	0
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *exc. sequestration*	632	723	1,071	1,085
In-use & End of Life Embodied Carbon (B-C) ($kgCO_2e/m^2$ GIA) *excl. B6 & B7*	494	482	469	472
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	1,126	1,205	1,540	1,557
Fuel source	Electricity	Electricity	Electricity	Electricity
Whole Building Operational Energy Use (kWh/m² GIA per year)	53	61	49	55
Whole Building Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	108.8	124.5	100.8	112.4
Target EPC rating	A	A	A	A
Total WLC Intensity (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) *B7 not considered*	1,237.8	1,332.5	1,647.6	1,682.4
Upfront Embodied carbon (A1-A5) (tCO_2e)	8,474	12,651	78,306	76,787
In-use embodied carbon (B-C) (tCO_2e)	6,624	8,434	34,291	33,404
Operational carbon for building lifetime (B6) (tCO_2e)	1,458	2,178	7,372	7,957
Total absolute WLC (incl. B6 and pre-demolition) (tCO_2e) *Module B7 not considered*	16,596	23,316	120,466	119,068

17. TARGET BREEAM RATING	Score: 81% Good | Very Good | **Excellent** | Outstanding Target: Excellent Aspiration to achieve Outstanding.
18. URBAN GREENING FACTOR	0.321
19. AIR QUALITY	New development would be all electric with the exception of life safety generators in line with Air Quality Positive requirements in London Plan 2021

Site Location Application Plan



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ADDRESS:
130 Fenchurch Street

CASE No.
25/00529/FULEIA

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Photos and CGIs

Existing Photos









Proposed GCI



Main Report

Environmental Impact Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.

2. The Local Planning Authority must take the environmental information contained in the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
   a) To examine the environmental information
   b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
   c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
   d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.

4. A Local Planning Authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The drafted statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the

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

5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.

6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.

7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

Site and Surroundings

8. The application site is located within the centre of the City of London, located at 130 Fenchurch Street, London, EC3M 5DJ. The site is bound by Cullum Street to the west, Fenchurch Street to the south, the pedestrianised Fen Court to the east, and the statutory open space Fen Court Garden to the north. The northern boundary of the site adjoins a wider city block which includes 34-36 Lime Street to the west and Lime Street Estate (37 and 40 Lime Street) to the north.

9. The application site is located in the Langbourn ward of the City of London (CoL) on Fenchurch Street, is a total area of 0.22 hectares (ha) and is almost entirely covered by the building known as ‘Fountain House’. This existing building was completed in 1959 (re-clad and extended in the early 2000s) and is comprised of a basement, two storey podium, a central tower of 13 storeys (70.5m AOD) and an eight-storey annex block that abuts the rear of 34, 37-39 (grade II listed) and 40 Lime Street.

10. Fountain House currently provides approximately 13,957sqm GIA of office and retail floorspace for commercial, business and services (Use Class E). The

existing office element of the building is vacant with the most recent occupation ceasing in December 2020. There is one retail unit located at the ground floor level which is still in occupation and a separate recent meanwhile use (Use Class F1 - culture) was approved under planning permission reference 24/01139/FULL which occupies the unit facing onto Fenchurch Street.

11. The surrounding area is predominately in office use with retail uses on many of the street frontages. Leadenhall Market is to the west of the site and its associated Principal Shopping Centre (PSC) includes the site's Cullum Street frontage. Fenchurch Street to the south is also designated as a Retail Link.

12. The application site is located within on the southern edge of the City Cluster and is located within the vicinity of a number of tall buildings which include 20 Fenchurch Street ('the Walkie Talkie'), 52 Lime Street ('the Scalpel'), 122 Leadenhall Street ('the Cheese Grater') and 22 Bishopsgate.

13. The existing building is not listed and a Certificate of Immunity from Listing was granted by the Secretary of State for Culture, Media and Sports on 8th January 2025. The site is not itself a listed building, nor a "non-designated heritage asset", and it is not within a conservation area, though it is adjacent to the following heritage assets:

- Leadenhall Conservation Area - located on the northwestern boundary.
- Grade II Listed 37-39 Lime Street - located on the northwestern boundary.
- Grade I Tower and Remains of Church of All Hallows Staining – located to the south east as part of the 50 Fenchurch Street development.

14. Further afield there are a number of heritage assets, most notably the Grade I Lloyds Building, the Grade II* Leadenhall Market, Grade II Lamb's chapel crypt and the Tower of London (World Heritage Site, Scheduled Monument and Listed Buildings).

15. Fen Court Garden, immediately to the north of the site, is the location of a former burial ground of St Gabriel's Church. In the 1960s, the area was changed to a paved public open space with shrubs and trees. The garden was further remodelled in the early 21st century and now includes seating areas and a memorial to slavery called "Gilt of Cain". Fen Court Garden is designated as Statutory Open Space.

16. In terms of public transport, the site is located within Public Transport Accessibility Level (PTAL) 6b (excellent), the highest rating available. The

scheme is well located to benefit from the numerous transport connections. Monument and Tower Hill London Underground Stations are approximately 360m south-southeast and 390m southeast of the site, respectively. Aldgate London Underground Station is approximately 480m northeast and Bank London Underground Station and Light Rail Services is approximately 540m northwest of the site. Liverpool Street Train Station, London Underground Station and Overground is approximately 600m north of the site.

17. The site is located within Flood Zone 1.

Relevant Planning History

18. The application site benefits from a significant amount of planning history and the most relevant are detailed below:

19. 130 Fenchurch Street (Fountain House) was original built by W H Rogers and Roy Fleming of the City of London Real Property Company during the 1950s. Planning permission was granted on 20 January 1955 for the following development "Erection of a new building at 125/133 Fenchurch Street, 1/4 (inc.) and 7 & 8 Cullum Street, 6 & 7 Fen Court & part of 35/37 Lime Street for use as offices with basement, restaurant & car park." (ref. 1797G).

20. Permission was granted on 24 November 2000 for: "Erection of two a storey extension in Cullum Street and change of use from offices (Class B1) to retail (Class A1 at part ground floor and basement level, external alterations, infilling of lightwell and podium level and installation of plant equipment with louvre enclosure at podium level, 8th floor and upper roof levels" (ref. 1797CE).

21. Both above applications were implemented, and these consents principally form the existing building.

22. Planning permission (application no. 14/00496/FULMAJ) was granted on 17th March 2016 for the demolition of the existing building and erection of a new building of two basements, ground and 17 upper storeys comprising office (Class B1) use [40,502sq.m GEA] and flexible retail (Class A1/A3) floorspace [558sq.m GEA] and associated cycle parking, servicing, storage and plant. [Total 41,060sq.m GEA]. This permission was not implemented.

23. Planning permission (application no. 16/00809/FULMAJ) was granted on 3rd August 2016 for the demolition of existing building and erection of a building

over two basement levels, ground, mezzanine and 18 upper storeys and a triple height plant storey [106.35m AOD] for uses comprising office (Class B1) [45,128sq.m GEA], retail (Class A1) and flexible retail space (Class A1/A3) [486sq.m GEA] with associated cycle parking, servicing, storage and plant. [Total 45,614sq.m GEA]. This permission was not implemented.

24. Subsequently, a s73 Planning Permission (19/00713/FULMAJ) was granted on 17 September 2020 in relation to previously granted permission 16/00809/FULMAJ for the following: Application under Section 73 of the Town and Country Planning Act to vary condition 38 (approved plans) of planning permission dated 29th March 2019 (16/00809/FULMAJ) to enable minor material amendments to the include: (i) revised facades to provide an alternative glazing solution including associated external changes; (ii) minor alterations to the internal layout of the building as a result of the proposed alternative glazing solution; and (iii) other minor associated changes. This permission was also not implemented.

25. The City of London Corporation received a request for an EIA Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the redevelopment of the site known as Fountain House, 130 Fenchurch Street on 20 Aug 2024. The scoping opinion was in relation to this proposed development and a formal response from the City of London Corporation was issued 22 January 2025. In summary, the response concluded that the approach to the Environmental Statement as set out in the Scoping Report was generally acceptable.

26. Finally, in terms of minor applications on site, planning permission for the *"Temporary change of use of part of the ground floor for culture use (Class F1)*" was granted on 25 October 2024 and this gave permission for the temporary use until 31 January 2026 where the floorspace will revert back to the former lawful use of 'Commercial, Business and Service (Class E) Use'.

Proposed Development

27. Under this submission planning permission is sought for the:

28. *Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and*

vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

29. The proposed scheme would seek to provide 69,553sqm (GIA) of floorspace comprising:

Proposed Land Use	GIA Proposed (sqm)
Office (Class E(g))	57,491 sqm
Culture (Class F1/E)	569 sqm
Public viewing gallery (Sui Generis)	644 sqm
Retail (Class E(a)-(b))	370 sqm
Plant/Back of House (BoH)	10,480 sqm
Total Proposed Floorspace	69,553 sqm

30. For clarity external areas, such as terraces, are not included within the above.

31. The existing Fountain House would be fully demolished to allow for the proposed development.

32. The proposed development seeks to provide a new building that would be formed by two adjoining towers: a north tower of 31 levels and maximum height of 135m AOD (approximately 119m above ground level), and a south tower of 34 levels plus plant mezzanine and maximum height of 161.46m AOD (145.86m above ground level). A three-level basement and basement mezzanine would cover the footprint of the Site, reaching a depth of -0.45m AOD (-16.45m below ground).

33. The tallest element would be positioned at the southwest corner along Fenchurch Street. Both towers would have a series of steps in building height: the north tower would step down to the north, and the south tower would step down from west to east.

34. Pedestrian access to the proposed development would be provided via a principal entrance on Fenchurch Street, with additional access points incorporated at Fen Court to the northeast. A new east-west pedestrian through route would be provided at ground level of the building which would seek to connect Cullum Street to Fen Court Garden and provide additional access to the building.

Office Floorspace (Class E(g))

35. The proposal seeks comprehensive redevelopment of the site to provide modern, Grade A, energy efficient office floorspace. The proposed office floorplates would range between 893 sqm and 1,575 sqm NIA and have the potential to be split into multiple tenancies to cater to a range of occupiers. Office space would be provided across levels 1-31 and the proposed development would have a series of terraces and amenity spaces for tenants to use which are not accessible by the public, including roof top terraces.

Culture (Class F1/E) and Public Viewing Gallery (Sui Generis)

36. In addition to office space, Level 17 would contain Culture Space and associated double height external terraces (Class F1/E), and Level 20 would contain a public viewing gallery, cultural space and an outdoor public terrace (Sui Generis).

37. At level 17 the public space, the Gallery, would consist of 569sqm of internal space proposed for Cultural (Class F1/E) use. Level 17 also has an external space (177 sqm in the form of double-height space) provision which would be associated with the cultural use.

38. At level 20, a public viewing gallery is proposed and a further ancillary cultural offer will be provided (which operates separately from the level 17 space), to provide activation to the viewing gallery (644sqm) and an external terrace (171sqm) (815 sqm in total).

39. Access is to be gained through a dedicated entrance lobby on Cullum Street, adjacent to the new route through, for both of the level 17 and 20 public areas.

Retail (Class E(a)-(b))

40. At ground level, retail/food and beverage space would be provided in addition to a lobby for the office use and the cultural/public viewing gallery. The proposed development would deliver 370sqm (422sqm when including plant) of new retail (Class E (a)-(b)) floorspace which would be located within the ground floor of the building. An independent retail unit would be provided within the new east-

west pedestrian route and there would also be further retail which would be integrated into the main office lobby on Fenchurch Street.

Public Realm

41. At ground floor level the facades are set back to increase the public realm and associated pavements widths around the site. The proposed development would be set back the ground floor façade line and create approximately 337sqm of accessible pathway round the building. Vehicle access to the site is proposed to be gained from Cullum Street where the delivery and servicing area would also provide a dual use and can be used as public realm with the potential for daytime food and beverage opportunities. One accessible parking bay would also be provided on-site within the servicing yard which is accessed via Cullum Street, and is in accordance with the London Plan.

Transport, Access and Cycle Parking

42. The development is proposed to be car free with the exception of one Blue Badge parking space. End of trip facilities for cyclists would be accessed via Cullum Street. A cycle ramp and a dedicated cycle lift suitable for larger and accessible bikes would provide access to the cycle parking location on basement level 1. A total of 860 long stay cycle parking spaces and 48 short stay cycle spaces would be delivered as part of the overall scheme.

43. The main pedestrian accesses to the building would be located on Fenchurch Street at the ground floor level, with a secondary entrance provided at Fen Court and the vehicle access to the site is proposed to be gained from Cullum Street.

Consultation

Statement of Community Involvement

44. The applicant has submitted a Statement of Community Involvement (SCI) prepared by Kanda Consulting. Public consultation took place across two stages from October 2024 to January 2025 and from February 2025 to March 2025. The consultation process was carried out in conjunction with pre-application meetings with the City of London Corporation (CoL), Historic

England, Historic Royal Palaces, Surveyor to the Fabric of St Paul's Cathedral and Eastern City BID.

45. The documentation details how Stage 1 sought to introduce the project team and the emerging proposals for the future of the site, giving stakeholders the opportunity to provide their feedback on the early design and help shape the detailed proposals. Stage 2 then sought to build upon the initial round of consultation and consult on the detailed proposals ahead of the submission of the planning application to the City.

46. The early engagement which took place between 29th April 2024 till 30th May The initial round of public engagement (Stage 1) took place between 10th December 2024 – 3rd January 2025. To promote engagement, a range of physical and online tools were used. These included introductory emails sent to 14 individual political and community stakeholders, a printed flyer sent to c.492 local residents and businesses, a dedicated consultation website that was visited 742 times, in person activities outside the building and at Fenchurch Street Station promoting the consultation and emerging proposals, two public exhibitions on the emerging proposals and an E-Newsletter was distributed, thanking residents for their attendance and asking them to provide feedback.

47. In total 10 responses were received regarding the Stage 1 emerging proposals survey. The majority of people (78%) who completed the feedback form indicated that they lived or worked in the area, whilst (22%) stated they were visitors to the area. The consultation feedback consisted of both quantitative and qualitative. In terms of the qualitive responses the following responses where received:

- Respondents agreed that the existing building is in need of investment and that this is a suitable site for redevelopment.
- There was a general agreement that the current building does not make a positive contribution to the local area.
- Feedback regarding cultural activities and amenities suitable for this location varied. Suggestions included the addition of a gym, a library, an exhibition space for art, and bars and pubs.
- Some respondents suggested that the building should be taller in order to add variety to the skyline.
- There was positive feedback amongst consultees regarding the design of the building.

48. The second phase of engagement took place between the 27th February 2025 and 14th March 2025. This phase of consultation consisted of emails sent to 14 individual political and community stakeholders, a printed flyer sent to 492 local residents and businesses, a dedicated consultation website that was visited 416 times, in person activities outside the building and at Fenchurch Street Station promoting the consultation and detailed proposals, two public exhibitions on the detailed proposals and three E-Newsletters were distributed, to promote the consultation, thank the community for their attendance, and to remind them to share their feedback via the online form.

49. There were 6 respondents to the survey by the time of its closure on 14th March 2025. In terms of the qualitive responses the following responses where received:

- Consultees welcomed the proposed design of the new building on the Site, noting that the proposals represented a refreshing change in design and materials when compared to other developments in the City.
- Similarly, consultees appreciated the building's articulated form, stating that it would provide new visual interest both within the Eastern Cluster and in views across the City.
- Feedback indicated a broad level of support for the Applicant's approach to the terraces, noting that mid-level height is in-keeping with other terraces in the area, such as the one at 120 Fenchurch Street and the proposed terraces at 50 Fenchurch Street.
- The Applicant's approach to better activating the ground floor through a range of uses, including new food & beverage uses, was welcomed by the majority of consultees.
- There was a broad level of support amongst consultees for the proposed pedestrian routes in and around the Site, in particular the new east-west route from Fenchurch Street Station through to Leadenhall Market.
- The majority of consultees and those that attended the public consultation events were broadly positive about the proposed cultural use and how this relates to the City of London's Destination City ambitions.
- Feedback surrounding the permanent cultural offer was mixed with various suggestions on activities that could take place in the space.
- The height and massing of the building were positively received again during the second round of public consultation, with respondents agreeing that the area is suitable for a landmark high-rise building and that the proposals are broadly in-keeping with the surrounding area

50. The Statement of Community Involvement can be read in full on the website and includes a full breakdown of responses as well as the circulated public material (i.e. Feedback Form etc).

Statutory Consultation

51. Following receipt of the application by the Local Planning Authority, it has been advertised on site and in the press and has been consulted upon validation in April 2025 for a period of 30 days. The application has been consulted upon twice as follows:

- On validation of the application in April 2024 for a period of 30 days.
- Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, for a 30 day period starting on 28 August 2025. This consultation covered some revisions to the design of the scheme and the request for updated information as a consequence of the revisions, including but not limited to updates to the Environmental Statement.

52. Copies of all received letters and emails making representations are attached in full and appended to this report and be read on the website. A summary of the representations received, and the consultation responses is set out in the table below.

Consultation Responses	
Active Travel England	No comment.
City And Hackney Public Health - Suicide Prevention	No objection.
City of London Aboricultural Officer	Concern raised over loss of tree.
City of London Access Officer	No objection subject to conditions.
City of London Air Quality Officer	No objection subject to recommended conditions.
City of London Transport Officer	No objection subject to conditions and obligations secured within a legal agreement.

	Response: Full comments highlighted and addressed within the Transport section below. Appropriate conditions and obligations secured as recommended.
City of London's District Surveyor (Fire)	No objection.
City of London's Environmental Health Department	No objection subject to recommended conditions.
City of London's Environmental Resilience Officer	No objection.
City of Westminster	No comment.
City Police - Counter Terrorism Security Advisor	No objection subject to condition.
Civil Aviation Authority (CAA)	The application has been assessed against safeguarding criteria, and we can confirm that we have no safeguarding objections to the proposed development. However, we would like to draw your attention to the following: CAA Building Notification As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'. CAA Crane Notification where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk) https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/ The following details should be provided before the crane is erected: • the crane's precise location

	• an accurate maximum height • start and completion dates **Response:** An informative would be attached setting out this advice.
Cleansing Services	Waste strategy proposed is acceptable and no objections.
Eastern City Business Improvement District	Support. We are grateful to the developer for their consultation and positive engagement with the BID through the planning process. We have shared our Public Realm Vision with them and drawn specific attention to the development's strategic location in the Eastern City, aligned with the project family routes set out in the document. We would urge consideration of these priority. Whilst the proposed project supports all of our principles outlined above, we specifically wish to draw attention to the following aspects of this application; New routes for pedestrians providing significantly enhanced connectivity, good alignment with the project family routes set out in our Vision; A significantly improved public realm experience to help reanimate this section of Fenchurch Street through new ground floor food and beverage uses, and a new pedestrian connection from Cullum Street to Fen Court, recognising the value of this as a green space in the area
Environment Agency	The Environment Agency (EA) has no objections to the proposed development but has provided advisory comments for consideration. Please consider the general advice on water resources, for which we recommend the applicant considers for this application. <u>Water Resources</u> Increased water efficiency in new developments potentially enables more growth to be realised without an increased

	availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants. We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority. **Response:** BREEAM issues are addressed below within the Sustainability section and secured via condition.
Gatwick Airport	No objection.
Historic England	The application site is within the setting of the Tower of London World Heritage Site (WHS), a heritage asset of exceptional and international significance. The proposals remain largely unchanged from the scheme we commented on at pre-application stage (4 December 2024) and involve replacing the current approx. 14 storey office building with a new 34 storey tower. The HIA provided indicates the new building would be visible in protected views of the WHS, adding incrementally to the growing cumulative impact of the Eastern Cluster on its

	significance and Outstanding Universal Value (OUV), as well as the local heritage context around Leadenhall Market. While the impact of this proposal would be modest and the level of harm low, we consider it could be reduced through a reduction in the height and mass. We recommend that you should only approve the scheme if persuaded that the harm has been sufficiently minimised and that the remaining harm is outweighed by public benefits. In making this decision you will need to give great weight to the conservation of the designated heritage assets. **Response:** consideration of the impacts identified in Historic England's response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, Designated Heritage Assets.
Historic England - GLAAS	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. An archaeological ES chapter and desk-based assessment accompanied the planning application (Mills Whipp 2025). An archaeological evaluation was also carried out on the site in advance of the planning application being submitted (PCA 2024). The ES and DBA identified that the site lies close to the centre of the Roman Provincial capital of Londinium, to the east of the Basilica – Forum complex. Substantial Roman buildings have been found in the area, most recently at 50 Fenchurch Street, and a Roman road may have crossed the site on the western side. In the late 14th century a garden was converted into a graveyard for St Gabriel's to the north of the site, although burials are not anticipated to extend onto

	the site itself. The whole site was destroyed in the Fire of London 1666 but soon rebuilt with dense houses, yards and alleys. Much of the site was destroyed in the Second World War. The present building was erected by 1958 with additions in 1970. The archaeological evaluation identified heavily truncated traces of Roman features in the south-western part of the side and on the east. In the north the basements were shallower but extensive modern foundations were present. Post-medieval and medieval deposits were found in this area and augering suggests Roman features may be present at depth. The proposed new basement floors will remove any surviving archaeological deposits across the site. Although the evaluation found material of Roman and post-medieval date, it did not identify any highly significant remains and therefore archaeological conditions are believed to be suitable to allow for excavation, recording and disseminatation of the remaining archaeology on the site. Recommended conditions. **Response:** Such conditions are recommended to be attached, and this response is addressed in the relevant section of this report below.
Lead Local Flood Authority	No objection subject to conditions regarding details of SuDS and SuDS management plan. **Response:** Such conditions are recommended to be attached, and this response is addressed in the relevant section of this report below.
London Borough of Islington Council	No objection.
London Borough of Lambeth	No objections.
London Borough Of Southwark	No comment.
London Borough of Tower Hamlets	No comment.

London City Airport	This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found to have the potential to conflict with London City Airport's safeguarding criteria. As such conditions are required for a Permanent Obstacle Lighting Scheme, Photovoltaic cells (Glint & Glare) Condition and CAA Crane Notification. **Response:** The matters raised are addressed via condition (as suggested and worded by the consultee).
Ministry of Housing, Communities and Local Government	No comments received.
NATS Safeguarding	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.
Natural England	No objections Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.
Network Rail	After reviewing the applicant's transport assessment, NR has no comments regarding Fenchurch Street and Moorgate Stations, as the impact on these stations is relatively low and there are no capacity concerns. However, concerning Liverpool Street Station, the transport assessment indicates that the majority of the additional rail trips will involve this station. NR would like to take this opportunity to remind the City of London our concerns regarding the forecasted growth in rail demand at Liverpool Street Station (LST). NR remains worried about the cumulative impact of multiple consented and proposed major developments in the immediate vicinity of LST, particularly concerning medium-term pedestrian flow and station concourse capacity. Currently, there is no committed or funded scheme to address the increasing pressure on

	pedestrian infrastructure within and around the station. This is a material consideration that should be weighed by the City of London when assessing the overall acceptability of ongoing developments in the area. We encourage the City to continue considering the potential allocation of its Community Infrastructure Levy (CIL) funds to address the collective infrastructure challenges created by cumulative growth. **Response:** Impact on Transport network is discussed in the relevant sections below. Officers note this response is a general non-site specific response, however this is noted.
Port of London Authority	No comment.
Royal Borough of Greenwich	No objection.
Surveyor To the Fabric of St Paul's	The proposals lie within the City Cluster, and thus within the setting of the Grade I listed Cathedral. In terms of view management, riparian views along the Thames and identified within the LVMF are of relevance. In addition, whilst not within the St Paul's Heights Policy Area, those local views identified are of relevance in terms of the backdrop and skyline setting of the Cathedral, as noted within the City's *Protected Views SPD*. Given the location of the site, it is noted that the scheme has potential to impact views along the Processional Way. ***The Processional Way*** We welcome the design response of the proposals in relation to avoiding impacts as appreciable along the Processional Way. In recent years we have begun to see a very positive shift in the way that proposals respond to this highly significant and sensitive aspect of the Cathedral's setting. This is matched by the evolving sophistication of the technology used to visualise and test proposals. The acknowledgement that the proposals will not be seen from *anywhere* along the Processional Way is therefore welcomed. We also now have a greater understanding of the role of the 300mm offset from the Fleet Street building line used for visualisations – and why the hard building line is not used in

	these instances. We still, however, seek assurance that Officers ensure that the scheme will not cause 'technical' visibility or any impacts along the Processional Way. As long as you are confident in the assessment methodology, we have no further comment. ***Contribution to the Cluster & Interaction with Emerging Policy*** The proposals will add a new tall building to the city cluster. As noted within the consultation meeting, those views of some relevance to the cathedral are those strategic and local views along the river corridor from the southwest. As discussed within our other representations on nearby schemes (see 60 and 70 Gracechurch Street), the Cathedral is interested in the overall design direction of the cluster in this regard. We are interested that City officers appear to take issue with our concerns relating to the urban design direction and form of the cluster. It seemed that Officers felt this was a matter which should be outside our role and interest. We would be happy to discuss this aspect of our commentary further. Our concern remains that a number of development proposals appear to deploy their design approach to 20 Fenchurch Street 'the Walkie Talkie' as a datum or target – seeking to create development that both forms a plateau in the overall form of the cluster. This development for 130 Fenchurch Street appears to be seeking to reach up to and envelop the 'outlier' of 20 Fenchurch Street. St Paul's feels that there is a collective 'urban design' discussion to be had about how the cluster is successfully formed and shaped as policy has been progressively opening up sites for substantial growth to the south and towards the river. This development process is happening very rapidly. The City are curious as to why St Paul's is interested in these townscape issues. Our view is that our locus does rightly consider the character and composition of key views of the Cathedral. These may also have heritage implications.

	This is of importance to those schemes discussed above given where they are located in relation to the Cathedral. However, it is also of relevance to 130 Fenchurch Street – given the proposals seek to build up to the height of the nearby consented 50 Fenchurch Street & the Walkie Talkie (the former here considered part of the baseline, though not yet complete). Whilst the proposals at 130 would be screened by the cumulative baseline, they still seek the same approach – using the Walkie Talkie as a 'target', rather than the earlier building remaining an outlier. There is of course planning history in the Inspector's judgements from 2009 regarding what was then judged as an anomaly in the formal planning and urban design of the Cluster. This is clearly also linked to emerging policy within the *City Plan 2040*, and thus part of wider conversations occurring to date. **Conclusions** From the information provided, we understand that perhaps the most prominent risk of heritage harm and adverse visual impact – as appreciable along the Processional Way, has been successfully avoided. As noted above, we seek assurance from Officers that this is the case. However, we do have wider queries about the future form of the Cluster that are of relevance to and are characterised by the proposals at 130 Fenchurch Street. We suggest that there can and should be a more express and transparent, public conversation around urban design issues relating to the Cluster at Planning Committee, as this is a more strategic matter that should not be determined on a case by case basis. **Response:** This is addressed in the following sections below: impacts of a tall building; architecture, urban design and public realm; St Paul's Viewing Points; and St. Paul's Cathedral. In summary, The designs have developed so that the height and form of the proposal would preserve the pre-eminent skyline setting of St Paul's in strategic views from the Processional Route.
Thames Water	Thames Water has raised concerns due to the development's proximity to strategic sewer and water mains. They request a

	condition requiring approval of a Piling Method Statement and Layout Plan before any piling begins, to prevent potential damage to underground infrastructure. Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that a condition be attached requiring all water network upgrades required to accommodate the additional demand to serve the development have been completed; or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied/ **Response:** The matters raised are addressed via condition (as recommended).
Transport For London	The proposed development supports active and sustainable travel, reducing car dominance in line with Healthy Streets indicators. The Active Travel Zone (ATZ) assessment and public realm enhancements including widened pedestrian space and new street trees are welcomed. Cycle parking provision and end-of-trip facilities are broadly compliant with London Plan Policy T5 and should be secured. The development is car-free, with no Blue Badge parking on-site, which aligns with Policy T6, subject to confirmation of accessible on-street provision. Servicing and delivery arrangements, including dual-use public realm and loading bay, are supported and should be secured via planning conditions. The Construction Logistics Plan (CLP) is broadly accepted in principle, noting that the City is the relevant highway authority, and Bus Stop Y outside 30 Fenchurch Street should be kept open throughout construction. Further detail is required on the length and positioning of any pedestrian diversions including full temporary Traffic Management plans showing on-street measures. The City should secure monitoring funding and

	any funding needed for temporary supporting highway works by their section 278 (s278) team. This is particularly important due to the close proximity of potentially simultaneous construction activity at 44-50 Fenchurch Street. The programmes for this development and that one should be co-ordinated to minimise impact; the current submitted CLP acknowledges the neighbouring site without detailed consideration for alignment with it. Improvements identified in the Active Travel Zone (ATZ) Assessment should be funded by the applicant. Further information is needed on a serious collision nearby, to confirm any further highway works mitigation required there. Planning obligations from the previous permission should also be increased pro rata and re-secured. Section 106 (s106) obligations are required to secure full long-term public access and access to the servicing area by out of hours cyclists such as night works, and disabled drivers, whenever possible, on request. This could also be addressed through the Delivery and Servicing Plan (DSP) and its supporting conditions. **Response:** This response is noted. A blue badge parking space is to be provided on site and the proposed conditions attached as recommended.
Transport for London (Crossrail Safeguarding)	No objection.

Letters of Representation

53. Given the location of the proposal within the City Cluster, the amount of surrounding residential properties is limited and in particular the immediate surrounding area devoid of neighbours. With that being said the residential properties (11 in total) within the wider vicinity were consulted and no responses where received at time of writing. A letter was received from the Eastern City

Business Improvement District, details of which are included within the table above.

Policy Context

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

55. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024, and has completed the formal hearings of its Examination in Public at the time of writing this report. 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 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

56. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of no or very limited weight and will not be referred to in this report.

57. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2025 and the Planning Practice Guidance (PPG) which is amended from time to time.

58. 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.

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

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

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

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

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

61. 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

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

62. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

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

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

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

66. Paragraph 104 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

67. 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*".

68. Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

69. Paragraph 118 states that "*All developments that will generate significant amounts of movement* should *be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored*".

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

71. 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."

72. 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.

73. 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...'

74. 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.

75. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net-zero by 2050. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

76. 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.

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

78. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.

79. 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.

80. 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*."

81. 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*."

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

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

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

83. 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*".

84. 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*".

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

Statutory Duties

86. 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).

87. 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).

Main Considerations

88. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.

89. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.

90. The principal issues in considering this application are:

a) The principle of development, including the appropriateness of the proposed uses.
b) The economic impacts/benefits of the proposal.
c) The impact of the of the development on the character and appearance of the area and the design of the building itself.
d) The impact on strategic views in the London Views Management Framework and on other strategic local views.
e) The impacts of the proposal on the setting and significance of heritage assets.
f) The impact of the proposal on existing public realm and the acceptability of the proposed new public realm.
g) The potential impacts of the development on buried archaeology.

h) The impacts of the development in terms of accessibility and inclusivity.
i) The impacts of the development in highway and transportation terms and cycle parking provision.
j) The impact of the development in terms of energy, sustainability and climate change.
k) The impact of the development on ecology and net biodiversity gain.
l) The environmental impacts of the proposal including wind microclimate, daylight, sunlight and overshadowing, air quality, building resource efficiency, energy consumption and sustainability.
m) The impact of the proposed development on the amenity of nearby residential and other occupiers.
n) The impacts in terms of security and suicide prevention.
o) The outcomes of the Health Impact Assessment.
p) The impacts of the development on fire safety.
q) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights.
r) The requirement for the development to secure financial contributions and other planning obligations.

Principle of Development - Economic Considerations

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

92. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.

93. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprise Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

94. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. That policy does not require a decision maker to assign a uniform level of weight- the weight to be ascribed to the economic benefits depends upon the nature and extent of the benefits in the light of any other planning considerations relevant to the assessment. The NPPF (at paragraph 87) also states that planning decisions should recognise and address the specific locational requirements of different sectors.

95. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 66,000 from 2021 to 2041. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

96. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to

sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

97. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design–led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.

98. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

99. In terms of the Local Plan 2015 Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sqm gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

100. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important

cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.

101. The emerging City Plan 2040 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1.2 million sqm NIA (1.6 million GIA) during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

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

103. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements.

104. The office demand in the City is current and pressing. Floorspace coming forward in the City will be of the highest standard, meeting the needs of occupiers across the City, including more agile working environments with lower workplace densities and higher amenity offices, implying a shift in the market in terms of demand for 'best in class' office space, focusing on environmental, health and well being, amenity provision and transport connectivity. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive

City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporations 'Destination City' vision for the square mile.

105. The proposed development would provide a primarily office led development, providing circa 3,610 number of full time jobs; as well as a material uplift in the office floorspace; namely 43,534sqm GIA, resulting a total of GIA of new Grade A office floorspace. Therefore, the proposed development would deliver on the City's strategic objectives and support its economic role, in accordance with development plan and the emerging City Plan. The anticipated economic benefits of the proposed development are material and significantly weigh in favour of the proposed development.

Proposed Uses

106. The proposed development would be mixed use. This section of the report provides an assessment of the acceptability in principle of the proposed land uses. The proposed scheme would seek to provide 69,553sqm (GIA) of floorspace comprising:

Proposed Land Use	GIA Proposed (sqm)
Office (Class E(g))	57,491 sqm
Culture (Class F1/E)	569 sqm
Public viewing gallery (Sui Generis)	644 sqm
Retail (Class E(a)-(b))	370 sqm
Plant/Back of House (BoH)	10,480 sqm
Total Proposed Floorspace	69,553 sqm

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

Provision of Office Accommodation (Class E(g))

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

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.

109. Adopted Local Plan Policy CS1 aims for a significant increase in new office floorspace in the City. This policy seeks to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver a minimum requirement of 1.2 million sqm NIA (1.6 million GIA) net of new office floorspace in the period between 2021 and 2040. The predominant use of the proposed development is as office space, comprising of 57,491sqm (GIA) of Office Floorspace Class E (g) (an uplift of 43,534sqm (GIA) of office floorspace on this site). The proposed office space is classified as Grade A office space.

110. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. This policy seeks to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver at least 1.2 million sqm net of new office floorspace in the period between 2021 and 2040.

111. The proposed office floorplates will range between 893 sqm and 1,575 sqm (NIA) and have the potential to be split into multiple tenancies to cater to a range of occupiers. Levels 01-31 contain office space with large floorplates that would provide open-plan space that wraps around a centre core, maximising natural light. A further northern core would also be provided to ensure sufficient evacuation and facilities for each floor. The proposed development has been designed so that it could be easily subdivided into two smaller tenancies to suit a wide range of tenants. The proposed office spaces are designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of interior and exterior environment amenity, floor area, and choice of outlook. This would accord with the emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

112. The proposed development would secure a substantial increase of best in class, next generation workspace in a highly sustainable location replacing the existing vacant low-quality office floorspace. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015

and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Provision of Retail Floorspace

113. Policy DM 1.5 encourages a mix commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also provided by policy OF1 of the emerging City Plan.

114. Strategic Policy CS20: Retailing seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

115. The west of the site, elevation along Cullum Street, is located within the Leadenhall Market Principal Shopping Centre (PSC) as defined by the adopted Local Plan 2015. Policy DM 20.1 of the Local Plan 2015 resists loss of retail, prioritises the PSCs for shops and seeks to provide new retail floorspace. The policy sets out the key criteria for loss of retail including the maintenance of shopping frontage predominance within PSCs, the contribution the unit makes to the function of the PSC, and the effect of the proposal to the area involved.

116. The south of the site, elevation along Fenchurch Street, is located within the Fenchurch Street Retail link. Policy DM 20.2 seeks to encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

117. Under the emerging City Plan 2040 the PSC is extended around the Cullum Street, Fenchurch Street and Fen Court frontage. Strategic Policy S5 and Policy RE1 are relevant to retailing and PSCs. Emerging Policy RE1 resist loss of ground floor retail frontage and/or floorspace and proposals for changes

between retail uses would be assessed against the contribution a unit makes to the function and character of the PSC, maintaining an active frontage, and the effect of the proposal on the area (size of the unit, length of the frontage, composition, distribution and location of retail uses and units within the frontage).

118. Officers note 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.

119. The existing site currently lies vacant in its entirety with the exception of a retail unit (café – Class E) and temporary meanwhile cultural use (Class F1) approved under planning permission reference 24/01139/FULL. Under previous assessments of the site, notably application 19/00713/FULMAJ, it was determined that the existing podium block had at one time provided approximately 1,487sqm (GIA) of mixed retail (Class E) space comprised of units over basement and ground levels.

120. While it is clear historically that the site at one point boasted a retail frontage this has since been lost due to vacancy over time and the building itself has largely become decommissioned. The only existing element of permanent retail floor space that exists currently on site is the café located on Cullum Street. Located within the PSC this retail unit provides approximately 193sqm of Class E(b) and has an active frontage of 8.6m.

121. Officers note that while the temporary meanwhile cultural use (Class F1) also currently provides active frontage within the PSC, planning permission 24/01139/FULL requires the removal of this on or before the 31st of January 2026 and as such this is not considered within the overall assessment of retail floorspace on site.

122. The proposed development seeks to deliver 370 sqm of new retail (Class E (a)-(b)) floorspace which would be located within the ground floor of the building (422sqm when including apportioned plant). An independent retail unit would be provided within the new east-west pedestrian route and there would also be

further retail which would be integrated into the main office lobby on Fenchurch Street. These two elements of retail would include frontages that would essentially 'bookend' the façade of the tower element onto Cullum Street. The remaining elements that would face onto Cullum Street (the PSC) would entail, the servicing area (which also has the potential to double up as cultural spill-out), the cultural space and viewing gallery lobby area and the 'End of Trip' facilities entrance.

123. The proposed development would therefore technically result in the loss of 1,117sqm of historical retail on site as whole. Policy DM20.1 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and that development should maintain a clear predominance of shopping frontage within Principal Shopping Centres. This is also echoed on DM20.2 for the retail link where a mix of shops and other retail use would be encouraged.

124. While there would be a loss of retail floor space within the PSC/Retail Link, this loss as a total would be akin to that previously considered acceptable under both 16/00809/FULMAJ and 19/00713/FULMAJ. While both applications have lapsed, these determined a loss of over 1,000sqm retail as acceptable due to the remaining quantum of street level floorspace and frontage which would continue to provide vitality and viability to the Leadenhall PSC and Fenchurch Street Retail Link. Under this application while the proposed retail provision would represent a slight decrease to that approved under 19/00713/FULMAJ (-76sqm), the proposed development would continue to provide retail within both the PSC and Retail Link. Therefore officers consider that the loss of retail on site has been accepted in principle historically under the same Local Plan.

125. The proposed retail component of the scheme and creation of active frontages would enhance the public interest and vitality of the street frontages on Cullum Street and Fenchurch Street and increase the permeability into the building through the creation of a pedestrian route. The proposed development would provide flexible retail floorspace at ground floor across key frontages which would be fit for purpose in the context of a changing retail market, while also being flexible and adaptable in layout to support of long-term vitality and viability of the Principal Shopping Centre and Retail Link. Additionally, the application would provide a new east-to-west pedestrian route linking Cullum Street (the PSC) to Fen Court Garden which would not only provide pedestrian permeability within the area but would also be provide a new opportunity for active frontages. When including the office within both calculations the proposal

would introduce a 138.73m frontage which would only resemble a 2.3m difference compared to that existing.

126. Furthermore, there is a focus in the emerging City Plan 2040 to transform Leadenhall Market to become a primary destination for visitors, capitalising on its unique heritage and nearby emerging attractions such as public elevated spaces. The expansion of the City Cluster workforce will increase the demand of retail activity in the surrounding streets. The emerging City Plan 2040, seeks opportunities to improve wayfinding in the area and better revealing the presence of Leadenhall Market itself, and to improve the accessibility of the area.

127. Aside from the retail offer the proposed development would provide a new visitor attraction of public elevated spaces in the surroundings of Leadenhall Market and increase the permeability around the PSC through the creation of a new pedestrian routes, therefore contributing to the vision of this area. The proposed development would also provide a new main arrival point for the elevated public spaces on the axis of the PSC and the new public route, directly opposite the new active frontage of the retail. The visitor uses (133.6sqm at ground floor and 1,213sqm at upper levels) would complement the retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access. During the day, there is also potential for a pop-up retail/cultural space within the new servicing space (126sqm) which is detailed within the cultural strategy and would be captured in the legal agreement. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster.

128. The combination of the proposed retention of retail specifically on the PSC and Retail Link, enhancement of the active frontages throughout and provision of significant cultural floorspace is considered to outweigh the loss retail stated above. In addition, in weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, close to the Eastern Cluster contributing to meeting the City's targets for increasing office floorspace. Other Local Plan objectives met include provision of a new publicly accessible viewing platform providing higher level views and public areas, in line with emerging City Plan policy. This principle of the technical loss of retail and subsequent

increase in office provision on site has been accepted previously on site and as such considered acceptable.

129. Furthermore, this loss is viewed in the context that the building itself, following the 2020 Use Class changes, transitioned into a general 'Use Class E'. As there are no restrictive conditions on site secured through historic applications, all of this existing vacant retail floorspace could be lost without the benefit of planning permission.

130. Officers note that under the emerging City Plan 2040 the PSC has been extended around the majority of the frontage of the existing building. While this would increase policy requirement, this would not alter the assessment above in the fact that there would still be a loss of retail, on the PSC and within the Retail Link.

131. In conclusion, the mix of uses would provide a complementary use to the offices and publicly accessible areas on the upper floors in accordance with Policy DM 1.5 as well as provision for other workers, visitors and residents of the City in accordance with the emerging City Plan 2040 Policy OF1. Whilst the proposed development would result in loss of retail on a PSC and Retail Link frontage, contrary to adopted Local Plan Policies CS20, DM20.1 DM20.2 and emerging City Plan Policy RE1, it is considered that proposed provision of flexible retail, provision of appropriate active frontage and provision of significant additional complementary uses would provide an enhancement to the vibrancy and vitality of the PSC, Retail Link and surrounding area. This would also be in compliance with the assessment found acceptable under the previous applications and as such considered acceptable by Officers.

132. A condition is recommended to secure retail uses falling within Class E (a/b), to prevent the change to any other use within Class E.

<u>Provision of Culture (Class F1/E) and Public Viewing Gallery (Sui Generis) Uses</u>

133. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:

- *Providing, supporting and further developing a wide range of cultural facilities.*

- *Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.*
- *Protecting existing cultural facilities where they are need.*
- *Providing visitor information and raising awareness of the City's cultural and heritage assets.*
- *Allowing hotel development where it supports the primary business or cultural role of the City.*

134. The emerging City Plan 2040 under policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.

135. London Plan Policy D9 part D seeks to incorporate free to enter publicly accessible areas in tall buildings. Policy DM10.3 of the Local Plan encourages high quality roof gardens and terraces where it does not cause other impacts with public access secured where it is feasible. Strategic Policy S8 of the emerging City Plan 2040 seeks to deliver publicly accessible spaces in tall buildings and emerging Policy DE4 requires all tall buildings or major developments to provide free to enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractions in the City and views from the skyline. Strategic Policy S21 (City Cluster) of the emerging Plan requires the provision of open spaces at ground level free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.

136. Policy DM 1.5 encourages mix commercial uses within office development. Complementary uses, include within others retailing, leisure, education and health facilities to contribute to the City's economy, character and appearance.

137. Strategic Policy CS22 supports the provision of health, social and educational facilities and opportunities for the City's residents and workers.

138. Functions of state health, education, creativity and cultural activities are also supported by Policy SD4 in the London Plan within the CAZ area.

139. The cultural/visitor offer within the proposal can essentially be broken down into two elements:

- The provision of a Cultural ‘Gallery’ (Class F1/E) and Terrace at Level 17; and
- A new elevated Public Viewing Gallery (Sui Generis) at Level 20

140. While two very much different provisions, the applicant has submitted a Cultural Plan for the proposed site to show how these are intrinsically intertwined in accordance with Policy CV2 of the emerging City Plan 2040. The 130 Fenchurch Street Cultural Plan presents a strategic vision for embedding culture within one of London’s most dynamic commercial districts.

141. The Cultural ‘Gallery’ (Class F1/E) would be located at Level 17 and consist of a 569sqm internal area with a 177sqm double height external terrace, 746sqm in total. The premise of this offering is to provide floorspace for contemporary art exhibitions with its own dedicate external space. The Gallery would host exhibitions, and installations while the Culture Garden would integrate public art, landscaping, and potential F&B opportunities in connection with the gallery. The vision of this Gallery is to be a space where art serves as a catalyst for exploring the urgent environmental and ecological themes.

142. The current temporary meanwhile cultural use, approved through planning permission 24/01139/FULL, has been used as a way of means testing the proposed cultural use over a temporary period on site. Through the current meanwhile use “Seed 130”, which opened to the public in March 2025 for a temporary period, the Applicant has established a rolling programme of cultural uses within the existing vacant building. The intention is that this research gathering project would inform the future curation of the cultural space. It also further illustrates that there is clear demand for cultural uses in the Square Mile and on the site specifically.

143. At Level 20 a new elevated Public Viewing Gallery (Sui Generis) is proposed which would consist of a 644sqm internal area with a 171sqm double height external terrace. The Public Viewing Gallery would offer internal and external spaces to views towards the west and south. Supported with an external terrace the viewing gallery is dedicated to the public and not in way connected to the office use within the building. This offering would be akin to the public viewing gallery located in surrounding buildings, notably adjacent at 120 Fenchurch, and would further add to the City’s network of publicly accessible elevated spaces. It would compensate for the partial diminishment of the westerly views from the garden at 120 Fenchurch which would be created by the scheme; these views would be re-provided, approximately, in the proposed Public Viewing Gallery.

144. Linking to the cultural space on level 17, the northwest portion (220sqm) of the Level 20 space is earmarked to be used as 'the Exchange'. This space would potentially be utilised by the future cultural organisations as an extension of the programming for the gallery, to host talks, panel discussions, workshops with art and design students, also utilising the location of the building and its views to the City of London. When not used culturally however this space would be retained as a continuation of Public Viewing Gallery.

145. Both Level 17 and Level 20 uses are accessed via the ground floor access from Cullum Street, adjacent to the new east-west access. The ground floor Cultural Space and Viewing Gallery lobby would provide lift access to these floors, and this area would also be able to facilitate security checks if required. The lobby has been designed to be double height while also providing views out to the existing Fen Court Garden to the east. There would also be potential for a pop-up retail space within the new under-croft servicing space which would need secured via any forthcoming permission.

146. Operationally, the Level 20 viewing gallery and terrace would be open between 10:00-19:00 (or nautical dusk, whichever is later) seven days a week. It has a capacity of 260 people (including staff), with a restriction on the number of people in the ancillary cultural space capped at 60 people within the total. Details of the management and operation of the Public Viewing Gallery (Sui Generis) would be secured under S.106.

147. Equally, in terms of the Cultural Gallery space at Level 17, a Cultural Implementation Strategy would be secured in the S106 agreement to secure a Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users. Furthermore, given the location of the Cultural Access Lobby at ground floor this could provide opportunities create a sequence of regenerative, well-being-led spaces within the development in conjunction with the Sustainability Strategy. Final details of the operation and management of the Cultural Space would be required by condition and within the S106 agreement.

148. The provision of the Cultural Gallery and Public Viewing Gallery would accord with policy which seeks to secure the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City and the proposal would contribute

towards the network of free viewing galleries across the City. It is considered that the proposal would provide a robust cultural offer for the site that would act as a new destination for the City in line with the Destination City Agenda, CS11 of the Local Plan 2015 and policy CV2 of the draft Local Plan 2040. The proposed Cultural Plan and its intended actions are welcomed and would be secured by condition and through the S106 agreement to ensure that the benefits are delivered in accordance with policy CS11 of the Local Plan.

Design And Heritage

149. The relevant local policies for consideration in this section are S10, DM10.1, DM10.3, DM10.4, DM10.8, CS12, DM12.1, CS12 CS13, CS14, CS16, DM16.2, CS19, DM19.1, DM19.2 of the Local Plan policies and HL1, S8, DE1, DE2, DE3, DE4, DE8, DE9, S10, AT1, S11, HE1, HE2, HE3, S12, S13, S14, OS1, OS2, OS3, OS5 of the emerging City Plan 2040 London Plan policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4,GG1-3, GG5, GG6, T1 and T2, and National Design Guide 2021 and NPPF 2024 (Achieving well-designed and beautiful places). Further guidance on the design of the public realm is contained within the City of London Public Realm SPD, the City of London Open Space Strategy SPD, and the City Public Realm Toolkit. This is in addition to the best practice guidance provided by the GLA.

Principle of a Tall Building London Plan D9 Assessment

150. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), >75m AOD) and London Plan D9 (A).

151. The application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.

152. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern

Cluster (CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).

153. The application site is located within the 'Eastern Cluster' policy area in the adopted Local Plan (CS7, fig G) and is not in an area identified as inappropriate for a tall building as shown on fig. N of this Plan. The application site is within the City Cluster Key Area of Change in the emerging City Plan 2040 (fig. 27) and the City Cluster Tall Buildings Area (fig. 15) of that Plan.

154. As the below assessment against D9 C and D shows, the proposal would have no harmful impacts on heritage, amenity or the skyline and the application site would therefore be a suitable site for a tall building in respect of policies CS7 and CS14 of the Local Plan and S12 and S21 of the City Plan 2040.

155. In respect of S12 (3), the contour rings relevant to the application site are the 160m AOD line directly to the south, the 140m AOD line which crosses the site and the 120m AOD line located to the west. The means that the proposal is required, in the language of policy S12 (3), to mediate successfully between 120m and 140m on the northern part of the site, to not breach the 140m line where this crosses the site, and to mediate successfully between 140m and 160m on the southern part of the site.

156. The proposal would not breach the 140m line where this crosses the site and, to the north, would successfully mediate between 120 and 140 through a series of terraces stepping down in a series of levels between 120m and 130m in height. To the south, the proposal would step upwards to a graceful crown with a distinctive, curvaceous profile that would swirl upwards to its highest point on the south-west corner. The majority of this part of the scheme would remain below 160m in height except the summit at the south-west corner, where the top of the glazed façade would terminate at 161.45m.

157. In the language of S12 (3), where a proposal is between the contour rings, it should successfully mediate between them and 'not exceed the next higher contour'. The next higher contour in this instance is the 160m ring to the south and the proposal would therefore exceed this height by 1.45m. This isolated and very marginal exceedance in height would draw a degree of conflict with the policy.

158. However, as the below assessment against D9 C and D makes clear, the proposal would meet the requirements of the policy as set out in the remainder of S12 (3), namely that it is thoughtfully designed, would contribute positively to

the skyline and townscape character, would contribute towards creating a coherent Cluster form and a varied and animated skyline, and would have architectural integrity.

159. Furthermore, the exceedance would not result in the proposal incurring conflict with views of any of the three Strategic Landmarks – St Paul's Cathedral, the Tower of London and the Monument – that the contour rings have been designed to protect.

160. As such, officers consider the scheme's very minor exceedance of the 'next higher contour' (160m) as academic in nature, with the objectives and spirit of the policy being complied with overall. Therefore, notwithstanding the exceedance, as a matter of planning judgement it is considered that the proposal would comply with S12 (3).

161. Taking all these matters into account, the proposal would accord with the locational requirements of London Plan D9 and the relevant parts of Local Plan policy CS7 and CS 14 and emerging City Plan policies S12 and S21.

Tall Building – Impacts

162. This section assesses the proposals against the requirements of policy D9 C (Impacts 1-3) and D (Public access) of the London Plan. The visual, functional, and environmental impacts are addressed in turn. Further assessment of the architectural approach and design details follow on below.

Visual impacts:

163. The proposal would be read as part of the consolidating City Cluster, helping to consolidate its southern fringe, particularly when viewed from Tower Bridge, Queens Warf and other southerly viewing points. The height and form of the proposal has been almost wholly shaped in response to St Pauls Cathedral and the Processional route where it would remain out of view; it has been amended following extensive pre-app discussions, including with Historic England, to ensure a sensitive relationship with the WHS, the Cluster, wider London skyline, historic skyline features, local views and the significance of strategic heritage assets.

164. The proposal has been designed with the future evolution and consolidation of the Cluster in mind, from strategic London-wide and riparian views, in addition to local closer-range viewing experiences.

165. The siting and height of the proposal, in addition to its refined elevations, have been carefully designed so that its stepping silhouette would add dynamism to the Cluster and be read as a positive architectural diversification of its southern edge which positively complements the cluster's overall composition.

166. Relative to the wider Cluster, the proposal would relate appropriately to the emerging and consolidating Cluster form, with its height of a scale commensurate with the stepping down from the apex of the Cluster at 22 Bishopsgate, and 1 Undershaft (consented) towards the river Thames. The variation in its top heights has also been chosen specifically to create gentle undulation among the rooftop heights of the existing and consented neighbouring towers along the southern fringe. Its height and form are considered to integrate and layer well with the overall composition of the Cluster. Such an approach to the future form of the Cluster has been informed by significant 3D modelling activity to ensure that the Cluster can develop and consolidate while minimising the possibility of harm to the City's strategic heritage assets.

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

- Undershaft: 309.6m (2024 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate 284.68m (resolution to approve)
- 99 Bishopsgate 253.5m (resolution to approve)
- 100 Leadenhall 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 30 St Mary Axe (the 'Gherkin'): 195m
- Leadenhall Court: 182.7m
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m
- 60 Gracechurch Street: 162m
- 85 Gracechurch Street: 147.9m
- 70 Gracechurch Street: 155m

The views of buildings from different distances:

168. Of the long range views D9 C (1; a; i), these have been tested in the THVIA April 2025 view Nos 1, 2, 3, 4, 5, A1, A2, A3, A4, B1, B6, B13, B23, B22, B24, B25, B26, B27, B28, B29, B30, B31 and include long range views from other London Boroughs, in addition to Strategic LVMF view points.

169. The impacts of the proposed development are discussed throughout the report and in detail in the Strategic View and Heritage sections of the report. In all relevant LVMF views, baseline and cumulative, the proposed development would preserve the setting of St Paul's Cathedral as the Important Landmark as well as the composition, features and characteristics of the LVMF views. In relation to long range views, the development would comply with Policy D9 C (1 a; i).

170. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are largely demonstrated in Views no. 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 , 19, 20 , 21, 22, 24, 25, A5, B2, B3, B4, B5, B8, B7, B9, B10, B11, B12, B15, B18, B32, B33 . In both baseline and cumulative scenarios, views from surrounding neighbourhoods, and across the river, the buildings' dynamic form, well-balanced proportions, and crowning top would make a striking contribution to the local townscape. The refined material palette would be entirely consistent with the Cluster, and surrounding streetscapes. Furthermore, its publicly accessible roof gardens and cultural space would be appreciable and legible within mid-range views as discussed in detail within the urban architecture and urban design section of the report. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).

171. In relation to immediate views, (London Plan D9 C (1; a; iii)), views no. 23, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, B16, B17, B19, B20, B21 illustrate the closer range views of the building and how the building is experienced at street level from along Fenchurch Street, Fen court Gardens, Lime Street, Cullum Street. Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall buildings with a landmark status. Equally, from Cullum Street, looking east, the new human-scaled and contextually designed new public route through to Fen Court gardens, in addition to the entrance to the Cultural space, would be experienced, and add richness to the pedestrian experience of these streets. The south-western edge of Fen Court Gardens would also be read as a successful and refined piece of contextual architectural design, taking on the hallmarks of neo-classical Edwardian architecture, which characterise the rest of the urban block.

172. To the south along Fenchurch Street, the building's base would be well-proportioned and articulated, with active edges, and a high degree of transparency, to activate this principal street frontage. While these immediate views would change, as the proposed building would be larger and wider than the existing, it would however have a positive relationship with the street, stepping in, and creating a vitality and activation through the public realm, in addition to creating a new public route. In relation to immediate views, the proposals would comply with D9 C (1; a; iii).

173. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would define the Cluster's southern edge and reinforce the Cluster's skyline form, which would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).

174. In relation to D9 C (1; c), the architectural quality of the facades is exemplary and would be maintained throughout its life span. In addition to its unique silhouette, the tower would be wrapped in a high-quality, well balanced facade, with successful proportions. As discussed in the architecture section of this report, officers consider that the architecture is well-considered , and of a high quality, which would be visually distinctive and an attractive addition to the skyline in itself, and is considered to comply with D9 C (1; c).

175. In relation to D9 C (1; d), a full assessment of impact on heritage assets is set out in the Heritage section of the report. Officers have not identified harm to any heritage assets. For the reasons set out in the detailed assessment of the architecture and urban design of the proposal, the proposal would positively contribute to the character of the area. As such, the proposal is considered to comply with D9 C (1; d).

176. In respect of D9 C (1; e) the proposal would be visible in relation to the Tower of London WHS as demonstrated by Views in the THVIA April 2025. The proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site, or the ability to appreciate it. This is by reason of its strategic

siting and scale within the long-established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 C (1; e).

177. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area as such, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).

178. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered to be minor adverse (not significant) as discussed in the relevant section of this report. Further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary). Subject to any necessary mitigation measures secured by S106 obligation, the proposed development would comply with Policy D9 C (1; g) of the London Plan.

179. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, and will be secured in detail via condition which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with Local Plan policy D9 C (1; h).

Functional Impact

180. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, these issues have been covered in more detail in the architecture and accessibility and inclusivity section of this report and are considered to be in accordance with London Plan policy D9 C (2; a).

181. The proposed servicing strategy would create a new vehicular access on Cullum Street to access a newly formed dual use area which would host blue badge

parking bays and be activated with public use outside of servicing hours. There are two servicing bays in this area to accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis has been provided demonstrating the manoeuvrering in and out of the servicing area. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.

182. The proposed permeable ground floor with the new pedestrian route though the building and the setting back of the building line on Fenchurch Street result in an increase in the amount of useable public realm around the perimeter of the site. Locations of entrances and access routes would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. The site has an excellent accessibility rating, with underground and rail stations in close proximity, as well as numerous bus routes and cycle route nearby in accordance with D9 C (2; c).

183. As discussed in the transport section of this report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as result of the development. The impact will require some intervention to the public highway which will be developed in detail as part of the S278/38 agreement and there would also be a S106 contribution. Such interventions comprise of reconstruction of the Fenchurch Street footway, provision of a raised carriageway on Cullum Street and associated tree planting which would be subject to feasibility studies, detailed design and consultations. The S106 agreement would require the developer to enter into a S278/38 agreement with the City of London to undertake any works to mitigate the impact of development in accordance with D9 C (2; d).

184. In particular, the provision of the office floor space, the flexible uses including retail and food and beverage and the multi-function cultural floor space would promote the creation of jobs, services, facilities and economic activity and will act as a catalyst for future growth and change in the locale in accordance with D9 C (2; e).

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

186. Overall, it is considered that the proposals would meet the functional considerations of Policy D9 C (2).

Environmental Impact

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

188. It is considered that the proposal would meet the environmental consideration of Policy D9 (C; 3).

Cumulative Impacts

189. As discussed in the preceding paragraphs, and within the architecture and heritage assessments below, the cumulative visual impacts of the proposal on consented and planned tall buildings in the area have been considered at every level, from macro skyline relationships (strategic views) to local streetscape details. The functional and environmental impacts have also been robustly assessed, in accordance with D9 C (4; a).

Public Access

190. The proposal would incorporate elevated public spaces at levels 17 and 20 providing cultural spaces and a view gallery orientated to the south-west. Level 17 would contain Culture Space and associated double height external terraces (Class F1/E), and Level 20 would contain a public viewing gallery, cultural space and an outdoor public terrace (Sui Generis). Both publicly accessible from the ground floor.

191. The proposal would accord with D9 (D).

Tall Building, Principle, Conclusion

192. Overall, officers considered the site to be appropriate for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9, and all relevant parts of Local Plan Policies CS7 and CS 14 and emerging City Plan 2040 policies S12 and S21.

Architecture and Urban Design

Existing Context and Building

193. The existing building on site, Fountain House, was constructed between 1954 and 1958, to the designs of W. H Rogers and Roy Fleming, with Sir Howard Robertson as consulting architect. Its principal component is the podium and tower, which was the first of its type in the post-war period in the City of London. The site has an irregular form, being connected to 34 Lime Street to the west along Cullum Street, and to the north, 4 Fenchurch Avenue. It also encloses the south and southwestern edges of Fen Court gardens.

194. In response to these different urban contexts, the building onsite is formed from a number of distinct but related elements. To the west along Cullum Street, the building reads as an 8 storey block, which forms a western wing to the tower and ties into this smaller-scale and finer-grained townscape of Cullum Street, much of which lies within the Leadenhall Market Conservation Area. Indeed, Fountain House marks the eastern boundary of the Conservation Area on Cullum street, and at ground level, with the exception of the entrance to the servicing bay, also continues the shopfront/retail character of the street.

195. The central and largest element, which primarily addresses Fenchurch Street, is the podium base and tower. The base is two storeys tall, with its elevations animated, given a human scale, and rhythm, by well-proportioned shopfronts which wrap its entire perimeter. The southern two corners of the podium are also chamfered which soften and provide additional public realm along Fenchurch Street, and its streets leading north. The primary entrance to the building is located in the centre of the Fenchurch Street elevation, via steps. Immediately above the entrance rises the 12 storey tower. The tower takes on a simple rectangular, cuboid form, with its narrowest face (3 bays wide) facing south and north, and its longest side (7.5 bays wide) running perpendicular to Fenchurch Street. The approach to the facades is similarly simple, being broken down into equally spaced vertical bays delineated by vertical bands of Portland stone, which contrast with the darker metal windows and spandrel panels within. The

tower has been extensively altered over the years, which includes the total replacement of the curtain walling and fenestration.

196. To the north, the tower element transitions into a 8 storey Portland stone building, to bridge into 40 Lime Street/No. 4 Fenchurch Avenue, which is a 10 storey stone faced building dating from the late 1930s, and a finer example of a modernist block, with more classical hierarchies and richer detailing. While this element of the subject site is relatively restrained, the change in approach is clearly driven by a desire to remain contextual and tie into the local townscape. This elevational approach also works well as a calm enclosure to Fen Court gardens.

197. A full Non-Designated Heritage Asset assessment is given in the Heritage section below, but it is concluded that Fountain House lacks the requisite interest and quality to be awarded this status. Historic England have also granted it a Certificate of Immunity (COI) from listing January 2025.

198. With the exception of the finer grain historic development to the west of the Site within the Leadenhall Market conservation area, the surrounding townscape, while varied in terms of architectural expression, is formed from large-scale, tall, commercial buildings that come to ground with strong/expressed bases and active frontage, the majority of which are designed as shopfronts, which unites the streetscape along Fenchurch Street and humanises its scale.

Proposed Design

199. The proposals seek to increase the density of office accommodation on the site, adding additional height and massing to the plot area, while also improving the architectural quality of the tower and the northwestern linking façade, joining 40 Lime Street and 4 Fenchurch Avenue. It would also provide two elevated public gardens, towards the middle of the southern tower, each supported by complementary café and art gallery spaces.

Massing and expression

200. The proposed development would have a unique envelope and silhouette, appearing as two interconnected tower elements which ascend in height to the south, while remaining invisible in views along the Processional route and St Pauls Cathedral. The massing has also been designed in response to the emerging massing diagram for the City Cluster Tall building area, and the scheme would (notwithstanding the slight 160m exceedance discussed above) successfully mediate between the contour heights of 120, 140 and 160m, helping

to consolidate the composition of the cluster while also adding to its richness through a diversification of its composite architectural forms.

201. The massing envelope has also been developed as a contextual response to local townscape. To the north, where the site forms part of an established smaller-scale historic urban block, and shares party walls with other buildings, the massing has been offset from its edges and height lessened, rising to a total of 130.10m AOD. Whereas to the south, the site is more independent, with more breathing space around its edges, and forms a principal address to Fenchurch Street, the opportunity to rise taller and be of a grander scale and profile has been taken. In addition to the crowning finish, discussed below, the prominence of the southern tower is amplified through the gentle curve given to its southern elevation, which echoes the curve of Fenchurch Street, as well as allowing for more breathing space to neighbouring developments, and introducing a unique and softer geometric form in the townscape.

202. Despite the composition of the proposed development as two tower elements, with the southern tower being the principal architectural moment (major) and the northern more subdued (minor), they share the same architectural design principles. In terms of massing, both have been designed to spiral upwards through a series of rising steps which volumes are carved from inset balconies, and rooftop terraces. Similarly, the elevations share the same high-quality glazed facades, which are broken down into four vertically stacked rectangular glazed bay modules (lightweight screens articulated and set off from the primary inner façade), that ascend across the facades and use the whole top fourth bay to oversail the massing and create distinctive and well-proportioned rooflines.

203. The northern tower's top floor is defined through an accelerating run of angled glass oversails, reaching its pinnacle on the south-western corner of the tower. True to the architectural language of stepping/spiralling, the southern crown would also be stepped in equal increments rising to it tallest point of 161.45m (AOD) on the south western corner. However, the design of the southern crown goes further, being formed from pleated, V-shaped sheets of glass, which wrap around all its edges. This diversity in profile is especially distinctive and dynamic through its assertive change in planes, which would reflect light differently and give a jewellery-like richness, much like a crown, to the top of the building. The crown would appear refined and beautiful, an object in its own right, as well as an enhancement to the southern boundary of the cluster and the city skyline.

204. For the northern tower, the interior of these roofscapes would be roof gardens for office occupiers, with BMU screened behind planting. For the southern tower,

the west, east and southern crown facades would screen the tower's plant spaces. However, the northern façade of the tower would be left unscreened, to avoid infringement into views of St Pauls Cathedral along the Processional Route from Fleet Street. The scale and quantity of the plant requirements proposed have been assessed, and the massing proposed represents an accurate projection of the building's requirements, in addition to the space required to house its BMU cradle. For the vast majority of views, the plant would be imperceptible; however, in long-range views from the east (HVIA view 23), the plant enclosure would be visible as well as from the viewing gallery at 22 Bishopsgate (THVIA view B19).

205. As such, a bespoke plant enclosure has been designed, with its massing following the principles established for the rest of the façade – being made up of four smaller stepping glazed modules. The lower of the two tiers would be faced with clear glazing with a shadow box behind, fully screening plant within, whereas the upper tier would use translucent frosted glazing – which would be more lightweight in appearance. With the exception of the BMU area, all of these boxes would be topped by metal fins, to screen plant from above, and ensure it is fully integrated into the architectural envelope. The final appearance and materiality of these will be secured via condition, in addition to the lighting strategy.

206. As aforementioned, the bodies of both towers are made up from a series of expressed rectangular glass bays, which would read as smooth/flush lightweight screens (with internal faming) articulated and set off from the primary inner façade, which give the proposed development an elegant vertical expression and assist in breaking down the lateral massing into smaller more slender components. Each of these bays would be framed with dark metal boarders and recessed channels along their vertical edges – giving shadow and definition to the expression of the modules. Each of these bays/screens would also be capped by a recessed balcony or terrace, which steps up a floor between each module. The horizontal reading of this, across the three layers where they are proposed, reinforces the spiralling/stepping expression for each tower, which modulates their proportions as well as providing interest through the inclusion of planting, which ascends from Fen Court garden to the tops of the towers, and would be legible from afar.

207. The middle run of terraces would be double height on the east and west corner, since these spaces form part of the public and cultural contributions of the development, where there would be a public viewing gallery and terrace garden at L20 and a cultural garden L17. The location of these terraces has been informed by and respond to the roof garden at 120 Fenchurch Street, with which

it would have a strong visually reciprocal relationship with, being part of a continuation of roof gardens at this elevated level. Importantly, the gardens at 120, and those proposed here, would have different urban roles and character, adding to the diversification of elevated public spaces in this part of the Cluster. Equally, the scale and corner locations of these spaces would reinforce their publicly accessible character and make them legible in both distant and local views.

208. The building's ventilation system is proposed to be fully mechanical, meaning that no part of the façade would be required for ventilation, and while the vast majority of the tower facades are glazed with integrated internal solar shading, or interior shadow boxes to conceal structure, there are some moments where additional solidity is proposed to the curtain walling system. In particular: the vertical seams, which mark the divide between the northern and southern towers, would have more robust dark metal framed windows; and the lowest northerly bay of the southern tower fronting onto Fen Court Gardens would incorporate projecting metal fins to give this area of the façade greater solidity, and a finer grain appearance in response to the character of the Gardens and its other enclosing elevations.

209. For the northern tower, the elevation enclosing Fen Court garden which directly adjoins 40 Lime Street and 4 Fenchurch Avenue, a Non-Designated Heritage Asset, takes on an entirely different character. Noting the necessity to remain contextual in this sensitive location, this façade would be faced primarily with light coloured stone, and given an expressly neo-classical hierarchy, with clear base, middle, and top. Each element of this façade would be elegantly proportioned, with robust, deeply modelled vertical stone piers, to reinforce its neo-classical character, along with the use of inset bronze spandrels which reference and blend features of the Edwardian Neo-Classical and early modern Beaux arts design found elsewhere within the Lime Street estate and adjoining urban block.

Base and Route Through the Site

210. The base of the building is divided by a new publicly accessible east-west route which connects Cullum Street to Fen Court gardens.

211. The southern tower's base is of a grander order, proportionate to the scale of the building above. These elevations are typically set in from the pavements to create approximately 337 square meters of accessible pathway around the building. Large V-shaped metal-clad columns, the widths of which align with the

edges of the glazed screens above, and echoing the geometries of the crown, are used to hold up the tower overhead. The majority of the base is wrapped by a fully clear glazed faceted façade, which would allow views into the building's interior.

212. On the north and western edges, the internal areas of the building would be in use as retail/cafe, and a publicly accessible coffee shop on the south-western corner adjacent to the office lobby. The primary entrances to the office accommodation would be through large barrel doors, one located centrally on the south, and a secondary entrance on the north-eastern corner. Notwithstanding the approved drawings for the elevations for the base of the building, a condition requiring further shopfront and entrance details, in addition to an integrated signage strategy, will be applied to ensure the publicly accessible areas of the building, are legibly expressed, and contribute to and continue the character of Cullum and Fenchurch Street.

213. To the north of the southern towers' ground floor plan, opposite Fen Court Gardens, the tightness of the pleating would increase to 1m panels, and every other facet of this glazing would be overclad in perforated metal panels – of bespoke pattern. This adaptation in the ground floor façade, to increase the level of solidity, is welcome and would positively enhance the sense of enclosure and reduce the light impact of the development on the gardens.

214. The northern towers base takes on a different character, both in response to the character and appearance of Cullum street, which it extends, and also the architectural character of the northern link façade which returns along the southern edge of the lobby to the cultural component of the scheme, and into the interior of the hybrid servicing/ disabled parking area. As such, all these elevations are clad in light coloured stone and punctuated with elegantly proportioned glazed bays with external projecting metal frames, that for the east and southern elevations of the cultural lobby, would provide views to its interior. Where these bays are blind within the servicing bays, they will be used as a gallery display art vitrines for the cultural space. The door to the cultural space is also a barrel opening to ensure parity of entry, while also creating a softened curved corner, to aid the legibility of the entrance to the cultural space within.

215. The elevational approach to the cultural offer is well considered and strikes the right balance between marking its presence prominently in the streetscape, while also being contextually relevant and rich, continuing the tradition of small, human-scaled alleys and lanes, which are characteristic of the City’s historic urban fabric.

216. A roller shutter has been proposed to close the servicing area outside of its hours of use. The intent for this is for it to be a bespoke piece of design, and notwithstanding the approved drawings, a condition detailing its full design and materiality full will be applied to the consent, to ensure it is of a high-quality appearance.

217. The new east-west pedestrian route and servicing area would be double height, with the exception of the bridge link which runs across its middle. Details of the soffits of both spaces are to be conditioned. The hardscape materials for the route through the site, in addition to the setback ground floors, would be paved with York stone, to be in keeping with the local City materials palette. Around the base of the larger tower columns, the material would change to rough natural stone as a raised ground feature, to demarcate the area of lower headroom at the base of the columns. Full details on size, format and paving orientation will be conditioned to ensure high levels of inclusivity. The undercroft servicing area and the resurfacing of Cullum Street will use granite sets, since these areas will be more heavily trafficked and therefore require more robust materials. Drop bollards are also proposed along the southern edge of the servicing area. Full details of these, and all other hard surface materials, including public facilities such as a drinking water fountain and litter bins, will be conditioned to ensure they are of a high quality appearance.

218. Two existing street trees along Fen Court would be affected by the development and will be protected during construction, while the recently planted Elm tree will be removed and replaced with two new elder trees. The street level tree planting, protection, and removal works will be secured by condition.

High Level Gardens

219. Level 17 provides a double height terrace directly opposite the gardens at 120 Fenchurch Street, creating a visual connection between the two developments. The terrace incorporates flexible space for cultural uses, integrated artwork and a variety of different seating types including linear benches with backrests and armrests, two tier bleacher seating, and wheelchair accessible positions. Seating and planters are arranged around a central flexible area to accommodate exhibitions and events. Soil depths of +600mm will support a verdant layered planting palette combining specimen trees, shrubs, perennials, groundcovers, seasonal accents, and climbers in structured vertical tiers to create depth, year-round interest, and enhanced biodiversity.

220. At level 18-20 a repeated palette of multi-stemmed trees along the southern elevation will visually connect the terraces on levels 17-20 with structural evergreens positioned for wind protection. Level 20 accommodates the Public Viewing Gallery, providing open views to the south and west framed by planting specimen trees. The design includes a central flexible area for movable furniture and installations with raised planters around the perimeter. Seating will cater to a diverse range of ages and abilities with wheelchair accessible spaces integrated into both the terraces and viewing areas.

221. Tenant linear terraces and balconies provide amenity space for office tenants while forming a key component of the “green spiral” concept that moves up the building. Terraces have been designed to facilitate wheelchair circulation and allow for tenant customisation. The uppermost terraces provide larger private amenity for office tenants with a layered planting palette of shrubs and biodiverse understory planting.

222. All planting, seating, and terrace safety measures for the high-level gardens will be secured via condition, requiring a full set of approved details. These will cover: soft landscaping layouts and species schedules, with seasonal interest, substrate requirements, and biodiversity value; specifications for all trees, including size, form, canopy spread, and tree pit design in line with British Standards; rainwater harvesting for irrigation; irrigation and nutrient delivery systems; urban furniture such as planters, seating, bins, and wildlife habitat structures; hard landscaping materials in accordance with the City Public Realm Technical Manual; landscape lighting; and a Landscape Management and Maintenance Plan for all soft and hard elements.

223. Suicide prevention measures have been integrated across all terraces and balconies through a combination of natural surveillance from internal offices, compliant handrails along planter and terrace edges (minimum 1.4 on private terraces and 2.8m on public terraces) and the use of deterrent planting along all accessible edges to inhibit climbing. Terrace layouts, furniture and raised planter positions have been carefully considered to maintain flexible usable spaces whilst reducing suicide risk. These measures are compliant with the City of London Suicide Prevention SPD and will be secured via condition.

Conclusions Architecture and Urban Design

224. The proposals would optimise the use of land, delivering high-quality office space, of the very highest architectural design quality. It would improve the site’s interfaces with, and contribution to its surroundings both through its architectural

expression, and the inclusion of a new route through the site which would connect Cullum Street to Fen Court Gardens. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1, GG2, GG3, GG5, GG6..

225. The proposed development would be a sophisticated interplay of expressive, elegant design, with the tower elements bestowed with unique crowning finishes that would enhance the City's skyline, and public elevated gardens signified within. Elevations on to Fen court Gardens are equally successful, where the eastern façade would be composed of high quality, contextually rich facades which transition into the prominent frontage of the cultural offer. These facades, within which seamlessly combine office, public, and cultural spaces, would create a visually compelling form which enhances the composition and visual quality of the City Cluster and would endow the proposals with a landmark quality, making it a fitting and distinguished addition to the City Cluster. This is in accordance with London Plan policies D3 and D5 City Plan policies S10,DM 10.1,10.3 and 10.8, and emerging City Plan 2040 policies S8 DE2, DE4, DE8 and HL1, and relevant sections of the NPPF and National Design Guide.

226. In terms of design and provision of public realm the proposals represent compliance with Policies,D3, D4, D5, D8, , T1 and T2 of the London Plan 2021, as well as CS3.3, CS10, CS16, DM10.1,DM10.3, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies OS1, S10, AT1, S8, DE2 and DE3, HL1 and S12 of the emerging City Plan (2040), and, The City of London Open Space Strategy SPD and the City Public Realm SPD. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm aspect of the proposals are considered by officers to be a benefit of the scheme.

Delivering Good Design and Design Scrutiny

227. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design.

228. In respect of D4B, the pre-application process including formal meetings, workshops using visual tools and site visits and has applied a holistic lens to the

design analysis to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.

229. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the service route layout, cycle routes and public realm development officers. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping. Wider engagement by the applicant is set out elsewhere in the report.

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

231. In respect of D4 D, the proposals have not been referred to an independent design review but have undergone a rigorous local "borough" process of design scrutiny as required by the policy. In addition, the applicants undertook preapplication engagement with St Paul's Cathedral, Historic England and Historic Royal Palaces.

232. In relation to D4 E, parts 1-6, there has been a "City" level of scrutiny comprising extensive officer topic-based reviews over multiple preapplications; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.

233. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity.

234. Overall, the application process has adhered to the intentions of London Plan D4 Delivering Good Design and officers consider that the relevant parts of the policy have been complied with.

Strategic Views and Heritage

235. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and CS14 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and

skylines. The Strategic Views referred to London Plan policies HC3 and HC4 are listed in Table 7.1 (pp. 293-4 of the London Plan). The Mayor's London View Management Framework (LVMF) SPG (the SPG) provides further guidance on the management of views designated in the London Plan. The City's Protected Views SPD gives further guidance on the implementation of policies relating to protected views.

236. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. The views selection was informed by extensive testing. The choice of visualisation types—render, wireline, and computer-modelled – and the division between verified and non-verified and appendix views, is based on the proximity and sensitivity of each view to illustrate the proposed development's impact. All viewpoints were agreed with officers.

237. Views within the THVIA depict the proposal in both existing/future baseline and cumulative development scenarios, the latter being presented in coloured wireline. Officers are aware that the submitted THVIA includes the 31-34 Bury Street scheme within the Cumulative Scenario. While this has since been formally refused by the LPA (20 March 2025), as the proposal is still within the formal timeframe for appeal, Officers consider it appropriate to remain within the Cumulative Developments for reference. This is not considered to have an impact on the method of assessment for the scheme.

238. Consultee responses and have been received from Historic England and St Pauls, which relate to the perceived impacts of the proposed tower on the OUV of the Tower of London World Heritage site, and on strategic views of St Pauls Cathedral. No objections have been raised. A commentary on these responses is discussed in detail below.

Tower of London World Heritage Site

OUV and Relationship to Setting:

239. The impact of the proposal on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes: (i) an internationally famous monument, (ii) landmark siting, (iii) symbol of Norman power and (iv) physical dominance (of the White Tower); and, to a lesser extent, (v) concentric defences,

(vi) surviving medieval remains and (vii) physical (historical) associative evidence.

240. Whilst the Tower of London comprises a scheduled ancient monument, various listed buildings and is within a conservation area (in the LB Tower Hamlets), it is considered proportionate and robust to consider the impact on OUV in order to draw a conclusion on the impact on these heritage assets.

241. The WHS Management Plan establishes a 'Local Setting', 'Immediate Setting' and non-spatially defined 'Wider Setting'; the proposal site is within the latter. The Local Setting Study (LSS) identifies those most representative views and/or viewing areas to and from the Tower of London which are deemed to exemplify the OUV and their components, with management guidance providing a baseline for assessing change. These representative views/viewpoints overlap with some LVMF viewing locations and these are assessed together here.

242. Importantly, the WHS Management Plan acknowledges the City Cluster as signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. Here is important recognition that the Cluster has an emerging, distinct identity and the relationship between the Tower and the Cluster is long-established, having existed for over half a century, forming a backdrop to many views of the Tower such as from within the Inner Ward.

243. In recognising the place of the Cluster in the Wider Setting, the Management Plan acknowledges (at para 7.3.18) that it will intensify as a distinct and separate element to the Tower. At para 7.3.27 it states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider (i) their effect on the established Cluster, (ii) the space between it and the Tower, and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

244. The intervisibility between the royal Tower and the commercial City, over which it was intended to command and defend from the river approach, is an integral part of the attributes (i) to (v) of OUV outlined above. Both the Tower and the City are ancient entities with a rich ceremonial life accrued through hundreds of years of existence, giving them a unique sense of place both central to and yet set apart from modern London. In the case of the City, that original commercial purpose remains and contributes to a relationship between the two entities that is nearly one thousand years old and therefore of unique interest.

245. The impact assessment set out below uses the assessment framework in the Mayor's London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS/UNESCO guidance.

Impact on OUV/Significance

246. The proposal would be visible within, and would therefore result in a change to, the wider setting of the WHS. However, change is not necessarily harmful. Views, including those identified within the LVMF view management framework, and ToL Local setting study, where the proposal will be experienced in conjunction with WHS are identified and assessed below.

247. Consultee responses have been received from Historic England, who have raised concerns regarding the scale of the proposed tower which has the potential to impact the setting of the Tower of London WHS. In particular, identifying that where the proposal would be marginally visible in the key view from within the Inner Ward of Tower of London WHS, and that this view is part of a kinetic experience and from other locations within the Inner Ward the building is likely to be more visible. This visibility is considered to add incrementally to the cumulative impact of tall buildings on the intimate experience of this part of the Tower of London, causing a further increase the relative prominence of the Eastern Cluster within the Inner Ward, leading to a low level of harm to the medieval remains attribute of OUV. However, HE also acknowledge that in LVMF's views the impact of the proposals would be neutral, being largely lost amongst the backdrop of existing towers within the City Cluster, and would therefore be unlikely to cause harm to the WHS's landmark siting and dominance attributes of OUV.

248. Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England on the proposal and conclude that there would be no harm to OUV.

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

249. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge). The LVMF SPG identifies that this location enables the fine details and the layers of history of the Tower of London to be readily understood. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th

and early 21st centuries, and earlier periods such as spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background, include the Cannon Street Towers, BT Tower, Centre Point and the Tate Modern (paragraph 182).

250. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187). The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (paragraph 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (paragraph 186).

251. In this view (THVIA View 13), the proposal would appear subtly to the west of centre within the Cluster, adding only a slim layer of built form between One Leadenhall and 50 Fenchurch Street. Its articulated crown and refined glass elevations would enhance the Cluster's composition. Due to its distance from the Tower of London (ToL), officers consider the viewing experience would remain largely unchanged, with the proposal complementing and consolidating the Cluster's distinct skyline. The World Heritage Site (WHS) would not be obscured or dominated, and key attributes of Outstanding Universal Value (OUV) including the White Tower's silhouette and its relationship to the Thames would remain unaffected, in line with LVMF guidance. The clearer, more coherent Cluster would contrast with the ToL's dominant riverside presence, reinforcing the legibility of their distinct skyline identities and supporting appreciation of the ToL's strategic and defensive character.

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

253. As such, in baseline and cumulative scenarios, the proposal would accord with the relevant aforementioned guidance and preserve the attributes of OUV as experienced in this view.

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

254. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflects over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.

255. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, which would be just to the west of centre in this viewing experience, it is not considered that the proposal would undermine the composition and characteristics of the view or those landmark elements. In this view the westerly two bays of the tower would be seen elegantly stepping up towards the west, with the pleats/folds in the towers crown offering texture, interest and refinement to the Clusters composition. Owing to the distance and location of the proposed development, the observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it.

256. The siting, height, and scale, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components in all baseline and cumulative scenarios.

257. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with

the visual management guidance (paragraphs 57, 418-422) and guidance contained in the Local Setting Study.

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

258. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.

259. Given the pre-eminence of the River Thames in the foreground of the view, which sees the ToL WHS on its eastern periphery, at significant distance from the Cluster, and the application site which only just within the viewing frame to the west/left, nestled between the 'Walkie talkie' and 50 Fenchurch Street as part of a consolidating cluster, it would not undermine the composition and characteristics of the view or those landmark elements within it. It would allow the observer a recognition and appreciation of the ToL as the Strategically Important Landmark.

260. The proposal would not affect the clear sky backdrop of the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, 'dominance' and silhouette of the White Tower.

Other LSS Views:
Inner Ward, Tower Green and the Scaffold Site (Views 14, and 16 and B9)

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

development should i.) respect that sense of place and ii.) ensure the buildings surrounding the Inner Ward remain the focus of the view.

262. Historic England have queried whether, in dynamic experiences of the Inner ward the proposal would be more visible than depicted in the THVIA and as a result add incrementally to the cumulative impact of tall buildings on the intimate experience of this part of the Tower of London, which in their view would further increase the relative prominence of the Eastern Cluster within the Inner Ward, leading to a low level of harm to the medieval remains attribute of OUV.

263. These viewing experiences have been assessed in a three-dimensional model and within views 14, and 16 and B9 of the THVIA. The proposal would, on the whole, be hidden behind the western range of enclosing buildings, having no visual impact. Where the proposal would come into view within the inner ward, this would be further back, on the approach to LSS view location 1 - THVIA View 14. This view represents the proposed development at its most visually prominent within the Inner ward. However despite this, only a very narrow sliver would be visible beyond 50 Fenchurch Street, and the rest of the Cluster, which forms the long-established backdrop of the Chapel of St Peter ad Vincula. The resulting impact on the composition of this view is therefore minimal, and where it would be seen, officers consider that the proposal would reinforce the existing composition of the City Cluster which has for decades been an established part of the backdrop of these views. Moving toward the Chapel towards LSS view point no. 1, in its immediate setting from the green, the proposal and rest of the Cluster moves out of view, ensuring the Chapel remains unchallenged and pre-eminent.

264. As such, Officers disagree with Historic England's assessment, and consider that the attributes of OUV would be preserved, in accordance with the guidance in the Local Setting Study, where the proposal would i.) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and ii.) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in terms of the overarching attributes of OUV while the relationship between the ToL set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct long-established backdrop entity.

Inner Curtain wall south

265. Local setting study view 4 recognises that this view is a 360 degree experience, the aim of which is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River. The associated guidance seeks to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

266. The proposal would again be predominantly occluded from view behind 50 Fenchurch Street (under construction), but as above, a slim portion of the tower would be visible in between 50 Fenchurch Street and 1 Leadenhall, to the west of the White Tower. As above, the proposed tower would assist in consolidating the Cluster's distinct urban form and separate long-established identity, and the White Tower, accentuated by its fortified, massive masonry crenelated walls, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while that relationship with the River and an appreciation of it as a historic gateway would be undiluted. In both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Inner curtain wall North

267. The Local Setting Study, in assessing views from the north Curtain Wall acknowledges that this is a 360-degree experience and demonstrates a clear contrast between the historic Tower and the modern city outside its walls. The identified aim is to i.) maintain views that reveal the relationship between the Tower and the City and ii.) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the Tower of London and the City to the north and that clear views of the concentric curtain walls should be preserved.

268. When viewed from west of Flint Tower, along the wall (THVIA View B10), the proposal would be entirely occluded from view by 50 Fenchurch Street. As such, the concentric defences would remain pre-eminent and an appreciation undiluted in these views under the baseline and cumulative scenarios, also in accordance with the guidance in the LSS.

Main entrance

269. The LSS acknowledges that this is a 360-degree experience which reveals the 'Tower's relationship to the river Thames and the City and emphasises the Tower's defensive architecture. The identified aims are (i) to maintain views which reveal the relationship between the Tower, the river to the south and the City to the north and (ii) enhance appreciation of the medieval military architecture of the Tower.

270. In the view from the Main Entrance (THVIA View 15), the top south west corner of the tower would be visible beyond Tower Place and behind 50 Fenchurch Street - which it would be substantially lower than. In this viewing experience, the proposed tower would, to a small degree, consolidate and strengthen the western profile of the Cluster. In the baseline and cumulative scenarios, both the Tower's relationship with the City and Thames and the qualities and pre-eminence of its defensive architecture and their appreciation would remain undiluted. In both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Other views and approaches

271. In other the views and approaches to the WHS identified in the LSS, as described above, the proposal would be either occluded in totality by other tall buildings within the Cluster, or heavily screened, such that its presence in these views retains their composition and integrity. The City Cluster has become an integral, long-established part of the setting and views of the WHS and the proposal would be consistent with this. In these other views and approaches, under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Conclusion on the Tower of London World Heritage Site

272. In baseline and cumulative scenarios, the proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3) emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV.

273. While Historic England have raised concerns about the way the proposal would add to the bulk of the Cluster, Officers disagree and contend that the additional massing the proposal would add to these viewing experiences would be so minor, and fleeting, that there would be very little cumulative impact, and that for the same reason, it would not fundamentally alter the Cluster's long-established visual relationship with the WHS.

274. Overall, the proposal would not harm the setting or significance of the Tower of London, whether in relation to the WHS or any of the component heritage assets which comprise it. The proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and significance, authenticity and integrity of the WHS, in accordance with Local Plan policies CS12, CS13 (3), City Plan 2040 policies S11, HE1, HE3, London Plan policy HC2 and HC4 and the associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and CoL Protected Views SPD.

London View Management Framework (LVMF) Impacts

275. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.

276. The site is located on the southern periphery of the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57 / 87 / 129 / 130 / 144 / 146 / 187). It is considered that the Cluster aids the observer's appreciation of the wider geography of London as a recognisable and important landmark. Officers consider it symbolises the historic commercial and economic heart of the capital, important in reading the wider socio-economic and cultural topography of London.

277. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several assessment points, these are discussed below.

London Panoramas

278. Designated London Panoramas at View 1A (Alexandra Palace), View 2A.1 (Parliament Hill), View 3A.1 (Kenwood), View 4A.1 (Primrose Hill), View 5A.1

(Greenwich Park) and View 6A.1 (Blackheath Point) are all assessed in the submission. In all views, the magnitude of change in these broad panoramas is considered negligible, with the site being almost fully occluded, or entirely occluded, by other development. As such, in these viewing experiences, it would accord with the relevant visual management guidance in the SPG by fitting within the prevailing pattern of buildings, consolidating the City Cluster which is identified as a landmark in these views, preserving their composition and the viewers' ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral.

River Prospects

279. Officers have assessed the extent of visibility of the proposed development in LVMF river prospect viewing experiences, both at pre-application and application stages.

280. In baseline conditions, the proposal would be readily visible from most westerly river prospect viewing experiences, notably Waterloo Bridge (15B.1-2) and Hungerford Bridge (17B.1-2), where its western elevation would sit just to the north of the 20 Fenchurch Street (Walkie Talkie), assist in consolidating the cluster's southern range, and complement the development of the emerging City Cluster as a coherent skyline entity. To the same end, in these views, the unique ascending silhouette of the tower's massing would be read in conjunction with its refined and elegant western elevation and crowning finish, also adding richness, dynamism and variation to the existing elevations of the Cluster.

281. However, owning to the site's position nestled towards the centre of the cluster, in the cumulative scenarios, from the majority of these viewing experiences (with the exception of London Bridge (11B.2) discussed above in relation to the ToL) the tower would be completely obscured by other tall buildings which have been consented on the western boundary of the Cluster – namely 60 and 70 Gracechurch street.

282. Officers consider that in both baseline and cumulative scenarios for all relevant river prospect viewing experiences, it would read at great distance from the identified Strategically Important Landmark/s – resulting in no change to overall composition of the views, and would not obscure, detract or dominate any identified landmark element within them, or draw tall buildings closer to St Pauls. The proposal would entirely preserve the ability to recognise and appreciate St Paul's, strengthening the composition and coherent urban form of an existing tall building cluster and would not obscure or detract from any landmark feature, in

accordance with the relevant visual management guidance in the SPG. The proposal would preserve the townscape setting of St Paul's in accordance with the visual management guidance.

Summary of LVMF Impacts

283. In the baseline scenario, there would be some minor enhancements to the River prosect views through the proposal's consolidation of the southern range of the City Cluster. During both day and night viewing experiences, the development will be perceived as a constituent element within the composition of the Cluster and would not command the focus within these views or distract unduly from other elements of their composition but be visually compatible with them after dark.

284. The proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks (St Pauls and ToL), in accordance with , London Plan Policy HC4, Local Plan Policy CS13 (1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.

285. The proposal would not harm the characteristics and composition of strategic views and would preserve St Paul's Cathedral and the Tower of London as the Strategically Important Landmarks in LVMF views.

City of London Strategic Views

286. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development.

St Paul's

287. The proposed development site is located within the southern periphery of the City Cluster, and as such falls outside of the St Pauls Heights policy area. The proposal is not located within the St Paul's Heights grid, would not be visible and would be out of scope of many of the Viewing Points identified in the Protected Views SPD (fig. 3).

288. On a strategic level, the height and form of the proposal has been shaped around the strategic heritage consideration of the Processional Route to the Cathedral from Fleet Street and to further consolidate a coherent Cluster form as a counterpoint to the Cathedral in these strategic riparian views, as assessed above.

289. From the Processional Route the envelope and been designed to be invisible and thus avoid any erosion of sky silhouette and space around the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance. The proposal would be entirely concealed by the Cathedral and the buildings lining the south edge of Fleet Street and Ludgate Hill along the route, and there would be no challenge to the primacy of the Cathedral (THVIA Appendix views A6-A10 and B14).

290. The Dean and Chapter of the Cathedral and Surveyor to the fabric have been consulted and raise no objection to the proposal. They have however questioned the assessment methodology which demonstrates its invisibility along the processional route. The methodology used in this case utilised highly advanced, accurate and detailed 3D modelling techniques – including kinetic video sequences, which informed the parameters of built form (including plant and rooftop exceedances such as balustrades) which could be developed while remaining concealed from views in all instances. The unique form of the tower is the direct result of this 3-dimensional visual testing process, which has also been demonstrated in verified views. This sophisticated methodology is now standard practice in such cases and officers are satisfied with the approach taken.

291. The proposal would cause no erosion of the setting of the Cathedral and would be consistent with Local Plan policy CS13 (2), draft City Plan 2040 policy S13 and associated guidance in the Protected Views SPD and LVMF SPG.

The Monument

292. The proposal site is outside the spatially defined views from the Monument which are protected under Local Plan policy. The proposal would be completely obscured in views from the north of the Monument viewing gallery by 20 Fenchurch Street; it would not be in the Monument's 'Immediate Setting' and would not therefore harm or obstruct important views from afar or locally.

Neighbouring Borough Views

293. The proposal's appearance in views from neighbouring boroughs has been considered, and tested as part of the THVIA, in addition, the proposal's impact in the views of heritage assets is detailed below. The views were selected on the basis of visibility. Views tested were:

- Islington Local View 4 | Archway Road (Point b) (THVIA View B30)
- Islington Local View 5 | Hornsey Lane Bridge, Archway Road (THVIA View B31)
- Lambeth Local Views SPD – Panorama i | Brockwell Park, viewing location c (THVIA View B24)
- Lambeth Local Views SPD – Panorama ii | Norwood Park (THVIA View B25)
- Lambeth Local Views SPD – Panorama iii | Gipsy Hill, viewing location ii (THVIA View B26)
- Lambeth Local Views SPD – Panorama iv | Knight's Hill, viewing location ii (THVIA View B27)
- Tower Hamlets Borough Designated View 2: Wapping Wall bridge (THVIA View B28)
- Tower Hamlets Whitechapel High Street, north of Altab Abi Park (THVIA View B33)
- Westminster WCC Metropolitan view 22, Dome of St Pauls from Somerset House River Terrace (THVIA View B29)

294. In all views the proposed development would be seen as a consolidating and constituent component of the City Cluster. In the case of Lambeth's long range panoramic views, where the proposed tower would be its most prominent and the full southern façade would be visible, it would be experienced as a dynamic and elegant addition to the Clusters southern foothills.

295. London Boroughs of Camden, Islington, Hackney, Lambeth, Greenwich and Southwark, were all consulted and have made no comment.

Historic City Landmarks and Skyline features

296. The proposal would have the potential to affect views of historic City Landmarks and Skyline Features. These have been assessed, and with the exception of the Tower of London discussed above, would have no, or highly limited, invisibility, such that their landmark contribution to townscape would be protected, in accordance with guidance of the Protected views SPD.

Conclusion on Strategic Views

297. The proposal has been sited in the City Cluster, seeking to consolidate strategic growth in areas with the least impact on pan-London and strategic views. In doing so, the proposal would preserve strategic views of and from the Tower of London World Heritage Site and the Monument, and of St Paul's Cathedral and its setting and backdrop.

298. In its role in consolidating the Cluster, the proposal would be a minor enhancement of the composition and characteristics of LVMF River Prospects.

299. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views.

300. It would preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral would preserve neighbouring borough views and would preserve views of relevant City Landmarks and Skyline Features.

301. Following rigorous assessment, the proposal would preserve all relevant strategic views in accordance with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policy HC2, HC3 and HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

Heritage

302. Comments on the impact of the scheme on settings of heritage assets have been received from Historic England, as well as other third parties. Officers have considered these representations carefully and afforded them considerable importance and weight. Where officers disagree with views expressed by statutory consultees, clear reasoning has been provided in this report.

303. Direct and Indirect Impacts on the setting and significance of listed buildings, conservation areas and non-designated heritage assets are assessed below:

Direct impacts

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

Non-designated heritage asset assessment

305. Officers have assessed the existing building against the criteria Historic England have suggested for selecting non-designated heritage assets, contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The criteria comprise: assets type; age; rarity; architectural and artistic interest; group value; archaeological interest; historic interest; and landmark status. The assessment is summarised below.

306. In terms of asset type, age, and rarity, as a purpose-built 1950's commercial tower, Fountain House was the first of its type in the post-war period in the City of London, and as such, the building holds a degree of interest. Equally, it holds a slight degree of historic interest by virtue of its architectural associations with W. H Rogers and Roy Fleming, and Sir Howard Robertson (acting as a consulting architect), the latter being a former President of the Royal Institute of British Architects and winner of the Royal Gold Medal for architecture. In terms of architectural and artistic interest, due to the wholesale changes made to the curtain walling system, and extensive loss of internal fabric from successive internal alterations, officers consider that the building has lost much of its design and aesthetic value. Officers also consider that in addition to the loss of original elevations and features, the building has insufficiently striking aesthetic value such that it is not considered to hold landmark status. In terms of group value – while it joins the corner with the Lime street estate and is of a modernist disposition, owing to the radically different building typology within this complete urban block, and the limited quality of its Portland Stone elevations, officers do not consider it to hold any group value with its surrounding townscape. Regarding archaeological interest, due to the modern materials and standardised construction methods used, the site offers no new or substantive archaeological information or interest.

307. In conclusion, while the building is of some slight historic interest as a modernist podium tower block designed by notable architects in the City, the building lacks sufficient interest across all relevant criteria to qualify as a non-designated heritage asset. It is relevant also to note that Historic England have granted it a Certificate of Immunity (COI) from listing January 2025. Therefore, its demolition is unobjectionable from a heritage perspective.

Indirect impacts

The Monument (Grade I and Scheduled Ancient Monument) THVIA 10, 11 and 12

Significance

308. The Monument to the Great Fire (“the Monument”), by seminal architect Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal containing inscriptions and base relief representative of the sociopolitical context in which it was built. The monument is also an early example of a purpose built public viewing gallery and visitor attraction, the scale and design of which was intended to be dominant over its surroundings and command a London-wide presence.

309. It is of exceptional architectural, artistic, historic and archaeological significance as a City and London-wide landmark, it also holds notable group value with other Wren designs across the City.

Setting

310. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

Impact

311. The proposal would appear in views of the Monument from The Queens Walk. THVIA View 11 shows the development to the right of the Monument between nos. 20 and 50 Fenchurch Street (currently under construction). The proposed development would introduce a new tall building towards the east of this view, although much of it would be obscured by the intermediary mid-rise buildings on Lower Thames Street and Byward Street and as such only part of the upper half would be visible with the crown of the building extending into the skyline. It would

appear lower in scale than both the foreground towers of 20 and 50 Fenchurch Street and as such would not significantly alter the existing skyline forming an infill within the established City Cluster, conforming to the established scale and form which steps down in height to the south.

312. The proposal would also appear in TVIA View 12 from The Queens Walk at City Hall and shows the development to the right of the Monument (which can be seen clearly within the skyline) between 20 and 50 Fenchurch Street. The proposed development would introduce a new tall building towards the west of this view, although much of it would be obscured by the intermediary mid-rise buildings on Lower Thames Street and Byward Street and half occluded by 50 Fenchurch Street and as such only half of the upper half would be visible. The tower in this view would not extend into the skyline and would be within the silhouette of larger towers in the background of the centre of the City Cluster. It would appear lower in scale than both the foreground towers of 20 and 50 Fenchurch Street sitting quietly within the established cluster, conforming to the established scale and form which steps down in height to the south. It would not alter the ability to appreciate The Monument which would remain unaffected in the skyline to the west.

313. Officers consider that while visible, the high-quality replacement building will not diminish the appreciation of the heritage asset and that there would be no harm to the setting or significance of the Monument as a grade I listed building and Scheduled Ancient Monument.

Tower Bridge (Grade I) Appendix B View B6, TVIA View 8

Significance

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

315. The building possesses very high architectural and artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings, and marriage of modern

functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London.

Setting

316. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

Impact

317. The proposal largely leaves the visual experience of Tower Bridge unaffected, including in views from the north, south and west. From Butler's Wharf and other views to the east, 50 Fenchurch Street would almost entirely screen the proposal from view.

318. The THVIA includes views from the River Thames on Millennium Bridge (THVIA View 8) and views from further east from Butlers Wharf (B6). Furthermore, 3D digital modelling techniques have been used in the assessment of the scheme and ensure a thorough analysis of the impacts on the setting and significance of Tower Bridge. Officers consider that the impact on views and setting of Tower Bridge has been fully assessed and the proposal would not result in harm to the setting and the significance of the grade I listed Tower Bridge.

St Paul's Cathedral (Grade I)

Significance

319. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even

international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting

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

321. Those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.

322. The ancient processional route of royal and state national significance along The Strand/ Fleet St, a ‘national spine’ of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation’s identity. This makes a substantial contribution to significance and an appreciation of it.

323. Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.

324. Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact

325. The proposal is located over 1km away from the Cathedral at the central southern portion of the City Cluster. Its long-range, strategic views presence and impact in relation to the Cathedral has been assessed in detail in the sections above along with 3D digital modelling techniques ensure a thorough analysis of the impacts on the setting and significance of St. Paul's Cathedral, which conclude that the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

Leadenhall Market (Grade II*) THVIA Views 26,33 and 34

Significance

326. Market complex of 1881 to designs renowned architect Sir Horace Jones, the City Surveyor. The Market comprises a series of roofed arcades disposed about a loosely cruciform plan (a layout preserving the medieval street alignment), with detached portions to the south, all lined with two storey units comprising shopfronts at ground level with offices/ancillary areas above. Of red brick and Portland stone dressings, the architecture is essentially classical, with much flamboyant renaissance-inspired detailing, and plentiful depictions of dragons and other references to the City Corporation.

327. The Market possesses a high level of historic interest for its status as descendant ultimately of the Roman Forum-Basilica, and subsequently the medieval Leaden Hall – as a gathering-place for mercantile activity; and for its associations with Sir Horace Jones, the City Surveyor who designed many accomplished market buildings for the City. Leadenhall was his last market building within the City's boundary.

328. The Market possesses a high level of architectural/artistic and historic interest for its memorable fusion of the medieval, irregular street plan with Jones's formal Market arcades, resulting in oblique, happenstance views and delightful

townscape juxtapositions. In this it was unique amongst Jones's City markets, the other two (Smithfield and Billingsgate) being more formally planned. Its high quality of design and construction illustrate the civic pride inherent in the planning and execution of such buildings.

329. Overall, the Market is considered to be of high significance.

Setting

330. Overall, the market draws a modest to moderate contribution from elements of setting to significance, in particular an appreciation of it. Most significance is intrinsic and inherent in the physical fabric, plan form and underground archaeology, rather than from setting.

331. To the west, south and east, the immediate setting of the Market is the Leadenhall Conservation Area in which it sits; the historic scale, architecture and urban grain of the CA provides a complimentary foil and sympathetic setting to the Market buildings. The same is true of the Bank Conservation Area lying further to the west across Gracechurch Street. These areas of setting support the historic and architectural/artistic significance of the listed building. Given the character of the market is somewhat self-contained, this wider historic environment makes a near moderate contribution to significance and an appreciation of it.

332. Located within the City Cluster of tall buildings, the setting of the Market to the north and east is of modern tall buildings; as set out in the assessment of the CA, these form a dynamic modern backdrop to the listed building, some of which are exceptional examples of commercial architecture of their time, such as the Leadenhall Building ('the Cheesegrater') and in particular the Lloyd's building, the group value with which the Historic England List Description for that building describes as ''wonderfully incongruous'' with some complementary 'nods'. This makes a modest contribution to significance and an appreciation of it.

Impact

333. Historic England has raised some concerns regarding the scale of the proposed tower, which has the potential to impact the setting of multiple designated heritage assets, including Leadenhall Market. They consider that the development would have an adverse impact on the local historic environment around Leadenhall Market, by merit of its significantly increased scale and massing.

334. They state that Leadenhall Market is currently experiencing a high degree of change, particularly in the scale of new towers being proposed around the central market halls, leading to an incremental erosion to the amount of natural light reaching the listed building. Historic England's comments are addressed below.

335. The application submission includes an Environmental Statement Volume I, Section 7 Ref: FCH-ARP-ZZ-XX-RP-EIA-000001 which covers daylight, sunlight and overshadowing. In the detailed assessment it covers impacts on Leadenhall Market and concludes that there would be a negligible impact overall with only additional shading from the Proposed Development in the morning between 8:00 GMT and 10:00 GMT from 21st March/September (equinox). During this time, however, these areas are already partially shaded by existing buildings and the additional shading from the Proposed Development would occur only for a short period of time. The rest of the year there would be no impacts. It was also concluded that the proposed development would have a negligible impact (not significant) on the hours of sunlight. The impacts of shadowing and hours of sunlight are not therefore harmful to the heritage assets setting, significance or result in any noticeable change to the experience of the internally naturally lit space of the central market halls.

336. The development would be seen in some local views with Leadenhall Market. THVIA View 26 shows a view from the roof garden of 120 Fenchurch Street looking west across the City. The Proposed Development would appear on the left side of the view, at close range given the location of the Site adjacent to 120 Fenchurch Street. It would replace 20 Fenchurch Street in framing the left side of the view and would obscure that building from sight. Looking downwards to the left of the Lloyds building can be seen the glazed roof of Leadenhall Market which is appreciated amongst taller buildings that surround the site and is very much a periphery building in the view.

337. More direct views of the development and Leadenhall Market can be had from the Entrance to Leadenhall Market from Leadenhall Place (THVIA View 33) and Bull's Head Passage looking east in (THVIA View 34).

338. The Proposed Development in THVIA View 33 would appear in the background of the view, in front of and partly obscuring 50 Fenchurch Street. It would be clearly understood to lie beyond the modern building at 10 Lime Street and the Lloyd's Building, at a slightly greater apparent height than the former and a lower apparent height than the latter. While a considerable new visual presence, in this context the Proposed Development would be consistent with the overall

character of the existing view, in which modern larger scale buildings are seen behind historic smaller scale buildings. The tower would appear distinct and separate from the lower scale buildings in the foreground, including Leadenhall Market where the existing more modest but taller buildings already form the backdrop to the view.

339. In THVIA View 34 The Proposed Development would be seen behind the modern extension to Forum House, in the near distance. The Leadenhall Market Building can be seen scaffolded and shrouded due to recent building works at the end of the passage. It would appear in front of 50 Fenchurch Street (under construction), at a broadly comparable apparent scale to that building, and obscuring it from sight. While it would represent a considerable change to the view from this particular viewpoint, the appearance of the Proposed Development behind smaller scale historic buildings closer to the viewpoint would be consistent with the existing character of the view and the local area more general.

340. The proposed design of the tower with the division into a north and south tower would be apparent from this viewpoint, providing it with a visually interesting form and breaking up its overall scale. The façade would be expressed as a series of glazed screens surrounded by metal frames, arranged to form slender vertical bays divided by vertical recessed channels, would help to break up the apparent scale of the Proposed Development and provide it with a vertically emphasised appearance. The horizontal terraces set within the bays and arranged in a ‘spiralling’ manner would also help provide the development with a distinctive and attractive appearance to the backdrop and termination of the view east along Bull’s Passage.

341. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views. The proposed tower would reinforce this characteristic.

342. The proposals would not harm the setting or significance of the grade II* listed Leadenhall Market buildings or the ability to appreciate it.

Lloyd’s Building (Grade I and Grade II) THVIA VIEW 33 and B17

Significance

343. The Lloyd's Building, designed by Richard Rogers Partnership (RRP) with engineers Ove Arup and Partners, opened in 1986. The stone façade, originally designed by Sir Edwin Cooper between 1925-1928 and listed at Grade II in 1977, is included in this assessment as it was integrated into the RRP building's design in the 1980s.

344. The Lloyd's building has historic interest as a highly inspirational late 20th century building by one of Britain's most significant modern architects for an internationally important organisation that successfully integrates the traditions and fabric of earlier Lloyd's buildings (including the Adam Room, originally from Bowood House and the 1925 Cooper façade).

345. The building has architectural interest as a prominent and high-quality example of high-tech architecture, with its design exemplifying architectural innovation, high quality materials and flexibility of plan throughout its impressive interior and exterior. The building's futuristic appearance and the clear architectural expression of different functional spaces contribute to a bold aesthetic.

346. Situated in the heart of the City, the Lloyd's Building forms a strikingly incongruous backdrop to many listed neighbouring buildings. It has notable group value with the nearby Grade II* Leadenhall Market, an important Victorian commercial building to which Lloyd's nods with its glazed atrium.

347. To its neighbouring buildings it presents a strikingly original aesthetic which has never been replicated in quite the same way within the Cluster. Its high-tech facades, shining metalwork panels and complex elevational design consistently draw the eye and make it one of the most standout buildings in the heart of the Cluster.

Setting

348. Such is its architectural singularity that the significance of Lloyd's relies very little on its setting. Tall commercial buildings define its immediate context, including the existing building on the site, the Leadenhall Building, 8 Bishopsgate, and 22 Bishopsgate to the north, the Willis Building and 52 Lime Street to the east, and 1 Leadenhall to the west. Most of these buildings make a neutral contribution to the significance of the Lloyd's Building. However, the Leadenhall Building, also designed by the Richard Rogers Partnership, with similar architectural elements such as exposed circulation and services is considered to make a low contribution to the Lloyd's Building's significance. The existing building on the

application site makes a neutral contribution to the significance of the Lloyd's Building, being one of many towers that surround it. St Helen's Square is also considered to make a neutral Contribution.

Impact

349. The proposed development can be seen in some close-up localised views adjacent to the Lloyd's Building in Leadenhall Place and in Lime Street opposite the Willis Building where the tower starts to reveal itself in kinetic views south along Lime Street from St. Helen's Square (THVIA Views 33 and THVIA B17. In each case it would be the top portion of the proposed development that would be seen with lower portions of the tower obscured by intervening development.

350. The Lloyd's Building occupies a prominent position within the City's commercial cluster and its immediate setting has much evolved in the 21st century to comprise numerous tall buildings which although do not contribute towards the heritage significance of the listed building, do form a positive part of its setting. The materiality and modern character of the proposed development would complement the Lloyd's Building whose original construction indicated the beginning of a new phase in the commercial and architectural development of the City.

351. As such, officers consider that the proposal would not result in harm to the setting or significance of Lloyds Building or the ability to appreciate it.

<u>37-39 Lime Street (Grade II) THVIA Views 32 and 33</u>

Significance

352. 37-39 Lime Street dates from 1929 and was designed by Leo Sylvester Sullivan with carved details by Henry Poole. The principal elevation to Lime Street is six storeys high and nine bays wide in a stripped classical style with carved neo-classical detail, faced with Portland stone. The tall ground floor base has a central pedimented entrance with carved stone detailing. Above are vertical strips of recessed windows separated by bronze spandrel panels, between close set verticals which step back above 4th floor level to end in anthemion finials. The two bronze-faced attic storeys are original.

353. The building has architectural and historic interest for its restrained neo-classical style with Art Deco influence and as a good example of an inter-war office building in the City of London.

Setting

354. Leadenhall Place and Lime Street form the principal setting of this listed building, the latter is of medieval origin and takes a meandering route to connect Leadenhall Street and Fenchurch Street. The buildings on either side of Nos. 37-39 are modern office buildings but are of similar scale such that they have a positive impact on its immediate setting along the historic route of Lime Street. The Site sits to the rear of the site but is occluded by the listed building and other buildings in Lime Street that it does not contribute to the listed building's setting.

355. The Lloyd's Building (Grade I) and the Willis Building, both close to the north, demonstrate the ongoing development of the City but otherwise do not contribute to the significance of the listed building. 30 St Mary Axe, 52 Lime Street and 20 Fenchurch Street are visible in longer views north and south along Lime Street and the top of 120 Fenchurch Street and the under-construction building at 50 Fenchurch Street are visible in views from Leadenhall Place towards the listed building looking east, providing an established wider setting defined by tall buildings.

Impact

356. The Proposed Development would be appreciated in the same views as the listed office building from Leadenhall Place looking eastwards in THVIA View 33 and from Lime Street looking northwards from the junction with Lime Street Passage in THVIA View 32.

357. The Proposed Development would appear in the background of the view, in front of and partly obscuring 50 Fenchurch Street (currently under construction) in THVIA view 33. It would be clearly understood to lie beyond the modern building at 10 Lime Street and the Lloyd 's Building, at a slightly greater apparent height than the former and a lower apparent height than the latter. While a considerable new visual presence to the rear of 37-39 Lime Street, in this context the Proposed Development would be consistent with the overall character of the existing view, in which modern larger scale buildings are seen behind historic smaller scale buildings.

358. The high-quality design of the Proposed Development with simple glazed facades with metal frames would form a calm backdrop for the historic building in the foreground, and the angling of the top edge of the uppermost glazed panels would provide the northern tower with a restrained yet distinctive crown.

359. Officers consider that the Proposed Development would not result in harm to the setting or significance of 37-39 Lime Street or the ability to appreciate it.

The Ship Tavern Pub, Lime Street (Grade II)

Significance

360. This classical mid-19th Century former public house is of architectural and historic interest, through its characteristic stock brick upper façade and traditionally proportioned and detailed frontage below. Its main significance is drawn from the physical fabric and prominent principal elevation to Lime Street.

Setting

361. Setting makes a lesser, moderate contribution to significance, in particular an appreciation of it. This derives from the group value with the adjacent complementary historic buildings to the eastern side of the street, as well as the red brick frontage of the market visible on Lime Street Passage, the latter echoing the proportions and Victorian character of the listed building.

362. The setting is also characterised by dramatic change in scale with a backdrop of the tall buildings of the City Cluster.

Impact

363. The development would be seen in the same view as The Ship Tavern on the junction where Lime Street Passage meets Lime Street. The upper portions of the north tower of the Proposed Development would be seen to the left of the view rising behind the Victorian buildings on the eastern side of Lime Street. The Ship Tavern to the right of the view is seen against a dramatic backdrop of 20 Fenchurch Steet. The Proposed Development would be consistent with the overall character of the existing view, in which modern larger scale buildings are seen behind historic smaller scale buildings. The tower would appear distinct and separate from the lower scale buildings in the foreground, where the existing more modest but taller buildings already form the backdrop to the view.

364. As such, officers consider that the proposal would not result in harm to the setting and the significance of The Ship Tavern public house or the ability to appreciate it.

St. Mary at Hill Nos. 6 and 7 (Grade II) THVIA View 24

Significance

365. Nos. 6 and 7 St. Mary Hill date from 1873 which was originally designed as a house and adjoining tea storeroom and warehouse for Sir Henry Peek. It was designed by Ernest George and Thomas Vaughan in an unusual, simplified Gothic style from yellow and red brick with Portland stone and granite dressings. It is four storeys with irregular openings. Rectangular openings to the stone ground floor, with columns and passageway.

366. The building has architectural interest as an early work of Ernest George and Thomas Vaughan in a High Victorian manner, with unusual, simplified Gothic style and historic interest as a late 19th century house in the City.

Setting

367. The west side of St Mary at Hill is characterised by a regularly defined building line, set on a narrow street. The position of the listed buildings embedded within this street frontage forms a positive aspect of their setting and, in the case of the neighbouring buildings of Watermans' Hall, 16 St. Mary at Hill, 6 and 7 St. Mary Hill, the Church of St. Mary and the Rectory at 8 St. Mary at Hill, these buildings can be considered to form an aspect of each other's setting that contributes to heritage significance.

368. The eastern side of St. Mary at Hill includes more modern, 20th century larger-floor plate buildings on consolidated plots.

369. The City Cluster and other larger scale buildings also characterise the local and wider setting of these buildings, with 20 Fenchurch Street in close proximity to the north and seen in many views looking north, together with some of the tallest buildings of the City Cluster such as the Leadenhall Building (as well as the Shard looking south). This contrasting wider modern setting does not detract from the heritage significance, or ability to appreciate the heritage significance of the 18th and 19th century buildings on St. Mary at Hill.

Impact

370. The top of the Proposed Development would be visible in the middle distance, behind the existing modern glazed building at 30 Fenchurch Street (THVIA View 24). While having a greater apparent height than 30 Fenchurch Street, it would

be consistent with the existing character of the background of the view and would appear distinct and separate from the historic buildings of St. Mary at Hill in the foreground which are experienced obliquely within the view.

371. The Proposed Development would represent a noticeable change to the view, consistent with its existing character with the tower appearing as part of the emerging cluster as a backdrop. In the cumulative view One Undershaft can be seen rising up behind the clockface of St. Mary at Hill reinforcing this relationship.

372. Notwithstanding the above the full significance of 6 and 7 St. Mary Hill is better appreciated in close view and as such would continue to be seen in the context of Watermans' Hall and 16 St. Mary at Hill, The Rectory and the Church of St. Mary retaining its relationship with its existing historic context.

373. As such, officers consider that the proposal would not result in harm to the setting and the significance of 6 and 7 St. Mary Hill or the ability to appreciate it.

St. Mary at Hill No. 8 Rectory (Grade II) THVIA View 24

Significance

374. The Rectory building dates from 1834 and incorporates a late 17th century vestry. The building is five storeys in height and built from yellow stock brick with vertical sliding timber sash windows and pedimented entrance. The stuccoed vestry element above a modern garage entrance to the right of the façade.

375. The Rectory has architectural and historic interest as an early 19th century residential building, incorporating earlier 17th century elements, one of a small number of surviving residential buildings of this period in the City.

Setting

376. The west side of St Mary at Hill is characterised by a regularly defined building line, set on a narrow street. The position of the listed buildings embedded within this street frontage forms a positive aspect of their setting and, in the case of the neighbouring buildings of Watermans' Hall and 16 St. Mary at Hill on one hand, and of 6 and 7 St. Mary Hill, the Church of St. Mary on the other, these buildings can be considered to form an aspect of each other's setting that contributes to heritage significance.

377. The eastern side of St. Mary at Hill includes more modern, 20th century larger-floor plate buildings on consolidated plots.

378. The City Cluster and other larger scale buildings also characterise the local and wider setting of these buildings, with 20 Fenchurch Street in close proximity to the north and seen in many views looking north, together with some of the tallest buildings of the City Cluster such as the Leadenhall Building (as well as the Shard looking south). This contrasting wider modern setting does not detract from the heritage significance, or ability to appreciate the heritage significance of the 18th and 19th century buildings on St. Mary at Hill.

Impact

379. The top of the Proposed Development would be visible in the middle distance, behind the existing modern glazed building at 30 Fenchurch Street (THVIA View 24). While having a greater apparent height than 30 Fenchurch Street, it would be consistent with the existing character of the background of the view and would appear distinct and separate from the historic buildings of St. Mary at Hill in the foreground which are experienced obliquely within the view.

380. The Proposed Development would represent a noticeable change to the view, consistent with its existing character with the tower appearing as part of the emerging cluster as a backdrop. In the cumulative view One Undershaft can be seen rising up behind the clockface of St. Mary at Hill reinforcing this relationship.

381. Notwithstanding the above the full significance of The Rectory is better appreciated in close view and as such would continue to be seen in the context of Watermans' Hall, 16 St. Mary at Hill, 6 and 7 St. Mary Hill, and the Church of St. Mary St. Mary at Hill retaining its relationship with its existing historic context.

382. As such, officers consider that the proposal would not result in harm to the setting and the significance of the Rectory at 8 St. Mary's Hill or the ability to appreciate it.

<u>Adelaide House, King William Street (Grade II) THVIA Views 10 and 11</u>

Significance

383. Adelaide House, built by Sir John Burnet and Tail in 1924-5 is a large, steel framed office building of 11 storeys, faced in Portland Stone and granite, with archaic Greek and Egyptian style decorative motifs. Its significance lies in its high

architectural quality, historic interest as an art deco office building and its setting on the north east side of London Bridge and the River Thames.

Setting

384. Adelaide House is located at the north-eastern bridgehead of London Bridge, and as such has a prominent position in cross river views and from the bridge itself. Its monumental form and striking architectural details are fully appreciable from these vantage points to the south. It is appreciated within the lower scale of the riverfront buildings, with the tall buildings of the City Cluster in its backdrop. It derives group value with the wide number of early 20th century and mid to late 19th century buildings which inform a key layer of the City's history and characterise large parts of the townscape. The tall buildings in proximity to Adelaide House, most locally 20 Fenchurch Street, but also the wider profile of the fuller Cluster in views from the south, do not diminish the setting, or heritage significance; or ability to appreciate that significance as a noteworthy example of 1920s commercial architecture in the City.

Impact

385. Views 10 and 11 of the THVIA illustrate the visual impact of the Proposed Development on the listed building. Within these views the eastern cluster provides a backdrop to and above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views and The Leadenhall Building, 22 Bishopsgate and Tower 42 appearing prominently behind.

386. The proposed development would add a high-quality element to the wider setting of the listed building within the cluster between nos. 20 and 50 Fenchurch Street. The stepped form of the tower and its distinctive crown would be seen against the skyline. The proposal would be an extension of the existing eastern setting, where a collection of tall buildings which make up the City Cluster can be seen. The addition of the proposal would maintain the character of the backdrop and would not harm the setting or significance of the listed building.

387. The tall buildings of the Eastern Cluster do not detract from the ability to appreciate its significance.

388. As such, officers consider that the proposal would not result in harm to the setting and the significance of Adelaide House or the ability to appreciate it.

<u>Custom House, Lower Thames Street (Grade I) THVIA View 16</u>

Significance

389. Custom House is a very large and imposing neo classical riverfront building of Portland stone. It was built 1813-1817 by David Laing and rebuilt by Robert Smirke in 1825. It is of high architectural and historic significance, connected to its function as an office for the collection of customs and excise taxes. Its open foreground setting on the river contributes to its significance and enables the appreciation of the architectural qualities in long views from the south bank and bridges over the River Thames.

Setting

390. Its immediate setting is characterised by the riverfront commanding prominent riparian views from the south bank. The adjoining buildings vary in scale and period and are of contemporary and classical design forming an important group with the former Billingsgate Fish Market to the west.

391. The wider backdrop setting to the north features the tall buildings of the City Cluster, creating a dramatic contrast in scale and form.

Impact

392. In addition to THVIA view 12 and B4, officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including Custom House and the proposals have been subjected to a robust and thorough assessment.

393. The proposal would be visible in the backdrop of Custom House and form part of its existing characteristic City Cluster wider setting but would not appear in close proximity. 20 Fenchurch Street is a prominent feature in the background setting of the listed building along with the emerging 50 Fenchurch Street which is currently under construction. In a position from the south bank where the Custom House would lie in axis on St. Martins Walk, the upper portion of the proposed development would be visible in a gap between existing and consented tall buildings. This is a minor addition in the background of the view within the established cluster, and the high quality of the proposed design will add richness to the overall composition.

394. The significance of the setting of the listed building and the setting's contribution to the significance of Custom House would not be harmed by the proposals due

to the distance and high architectural quality of the new tower. This will cause no harm to the setting or significance of the Custom House or the ability to appreciate it.

Former Billingsgate Market, Lower Thames Street (Grade II)

Significance

395. Billingsgate Market, by Horace Jones, was built in 1872 as the City's fish market. Its significance lies in its French 17th century classical style architecture, in brick with attractive Portland Stone dressings as well as its historical uses. Its riverfront setting contributes to its significance.

Setting

396. Its immediate setting is characterised by the riverfront commanding prominent riparian views from the south bank. The adjoining buildings vary in scale and period and are of contemporary and classical design and forms an important group with Customs House to the east.

397. The wider backdrop setting to the north features the tall buildings of the City Cluster, creating a dramatic contrast in scale and form and is dominated by the form of no. 20 Fenchurch Street.

Impact

398. The proposed tower would be visible in the backdrop of the former Billingsgate Market forming part of the City Cluster in the wider setting but would not appear in close proximity. Twenty Fenchurch Street is a prominent feature in the background setting of the listed building along with the emerging 50 Fenchurch Street which is currently under construction. In a position from the south bank where the Custom House would lie in axis on St. Martins Walk, the upper portion of the proposed development would be visible in a gap between existing and consented tall buildings. This is a minor addition in the background of the view within the established cluster, and the high quality of the proposed design will add richness to the overall composition.

399. In addition to THVIA view 11, officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including former Billingsgate Market and the proposals have been subjected to a robust and thorough assessment.

400. The proposed tall building would form part of the typical change in scale and would not harm the setting or significance of Billingsgate Market or the ability to appreciate it.

1 Cornhill (Grade II) THVIA View 22

Significance

401. A grand Classical building of rusticated Portland stone with an iconic rounded corner supporting dome, built in 1905. Its significance lies in its high architectural quality and landmark presence in views looking east from Bank Junction and Cheapside.

Setting

402. It is situated at the junction of Cornhill and Lombard Street within the Bank Conservation Area and as such is neighboured by a broadly cohesive and contemporaneous 19th century townscape informed by a similar datum and a commercial typology with an often Classical architectural style.

403. The wider setting is characterised by the visibility of tall, modern buildings which is part of its character and does not detract from the significance of the listed building.

Impact

404. The City have carried out a thorough analysis of the impact of the proposals on views, including from Poultry, via the use of 3D modelling and digital technology to enhance the assessment of the scheme. In the view from Poultry, looking towards the curved corner formed by no.1 Cornhill the proposed development would appear in the background to the right of its dome.

405. The introduction of the proposed development in the wider setting (THVIA View 20) would not affect the significance of the listed building. From Bank Junction the upper levels of the western elevation of the Proposed Development would be visible in the background of the view in combination with 20 Fenchurch Street. It would be legible as part of the established urban background of tall buildings and would form a high-quality and slender addition to the background skyline. The foreground buildings would remain the focus of the view.

406. In the cumulative scenario the Proposed Development would be visible in combination with 85 Gracechurch Street, 60 Gracechurch Street and 70 Gracechurch Street, further defining and characterising the background skyline of the City Cluster. The proposals would not harm the setting or significance of 1 Cornhill or the ability to appreciate it

St. Margaret Pattens (Grade I) THVIA View 24

Significance

407. The Church of St Margaret Pattens dates from 1684 to 1689 and was designed by Sir Christopher Wren. The building has a rectangular plan with the north aisle terminated by a north-west tower which is topped by a tall gothic octagonal spire. The exterior is largely of stone, some of which has been painted. The south elevation is partly obscured by Nos. 43-45 Eastcheap and has a doorway at its western end, topped by a segmental pediment.

408. The church is of exceptional architectural and historic interest as a good example of a post-Great Fire Wren church. Its polygonal spire although Baroque in date is remarkably medieval in appearance and was described by Pevsner as one of Wren's best spires. Its historical value is enhanced by the fact that it is still used for its original purpose. It represents a good example of Wren's later City church work when much was delegated to Hawksmoor, then Wren's assistant. The church has communal value as a place of worship. It is one of only a few City churches to have escaped significant damage in the Second World War.

Setting

409. The Church of St Margaret Pattens is surrounded by development on all sides with the substantial 20 Fenchurch Street located immediately to the west, and the large 30 Fenchurch Street (former Plantation Place) directly to the north which occludes the Site from views looking north from St. Mary At Hill (THVIA 24). 122 Leadenhall Street is also visible in the background of the church in views along Rood Lane. Despite the presence of surrounding tall buildings, the church retains its prominence in the immediate townscape by virtue of its corner position and tall spire. The surrounding modern mid-rise and tall buildings do not contribute to the significance of the listed building but have created an established contrasting modern setting.

Impact

410. The top of the Proposed Development would be visible in the middle distance, behind the existing modern glazed building at 30 Fenchurch Street (THVIA View 24). While having a greater apparent height than 30 Fenchurch Street, it would be consistent with the existing character of the background of the view and would appear distinct and separate from the Church of St Margaret Pattens and the historic buildings of St. Mary at Hill in the foreground.

411. The Proposed Development would represent a noticeable change to the view, consistent with its existing character with the tower appearing as part of the emerging City Cluster as a backdrop. In the cumulative view One Undershaft can be seen rising up behind the clockface of St. Mary at Hill reinforcing this relationship. The spire of the St Margaret Pattens would not be impacted by the Proposed Development and it would continue to be clearly read in the skyline terminating the view northwards along St. Mary at Hill.

412. As such, officers consider that the proposal would not result in harm to the setting and the significance of St. Margaret Pattens nor the ability to appreciate it.

Church of St. Mary at Hill (Grade I) TVIA View 24

Significance

413. The Church of St. Mary at Hill dates from 1670-76 and was designed by Sir Christopher Wren. The west tower and flanking lobbies were added by George Gwilt in 1787-88 when the plaster vault ceilings were likewise renewed. The church is nearly square in plan, with four columns supporting a cross barrel vault and low dome with a lantern. To St Mary at Hill, the elevation is painted, with a central blind venetian window, flanked on either side by tall round-arched stained glass windows and a projecting bracketed clock to the southern end.

414. The church has historic interest as a post-Fire Wren City church and architectural interest in particular for its Byzantine inspired plan form.

Setting

415. The immediate setting of the Church of St Mary at Hill is characterised by the intimate scale of Lovat Lane to the west, and the closed character of St Mary at Hill to its east. It lies within the Eastcheap Conservation Area. To Lovat Lane, views towards the church are limited due to the narrow route and its curvature. To St Mary at Hill, there is no access to the church and as such it has a rear character.

416. The west side of St Mary at Hill is characterised by a regularly defined building line, set on a narrow street. The position of the church is embedded within this street frontage with other historic buildings, in the case of the neighbouring buildings of Watermans' Hall and 16 St. Mary at Hill and the Rectory at 8 St. Mary at Hill on one hand, and of 6 and 7 St. Mary Hill on the other, these buildings can be considered to form an aspect of each other's setting that contributes to heritage significance.

417. The eastern side of St. Mary at Hill includes more modern, 20th century larger-floor plate buildings on consolidated plots.

418. 30 Fenchurch Street (former Plantation Place) directly to the north occludes the Development Site from view and as such it does not contribute to the church's setting. The City Cluster and other larger scale buildings characterise the local and wider setting, with 20 Fenchurch Street in close proximity to the north and seen in many views looking north, together with some of the tallest buildings of the City Cluster such as the Leadenhall Building (as well as the Shard looking south). This contrasting wider modern setting does not detract from the heritage significance, or the ability to appreciate the heritage significance of the Church of St. Mary at Hill.

Impact

419. The top of the Proposed Development would be visible in the middle distance, behind the existing modern glazed building at 30 Fenchurch Street (THVIA View 24). While having a greater apparent height than 30 Fenchurch Street, it would be consistent with the existing character of the background of the view and would appear distinct and separate from the historic buildings of the Church of St. Mary at Hill and other historic buildings in the foreground which are experienced obliquely within the view.

420. The Proposed Development would represent a noticeable change to the view, consistent with its existing character with the tower appearing as part of the emerging cluster as a backdrop. In the cumulative view One Undershaft can be seen rising up behind the clockface of the Church of St. Mary at Hill reinforcing this relationship.

421. Notwithstanding the above the full significance of Church of St. Mary at Hill is better appreciated in close view and as such would continue to be seen in the

context of Watermans' Hall and 16 St. Mary at Hill, the Rectory and 6 and 7 St. Mary Hill retaining its relationship with its existing historic context.

422. As such, officers consider that the proposal would not result in harm to the setting and the significance of Church of St. Mary at Hill or the ability to appreciate it.

Church of St Magnus the Martyr (grade I) THVIA 11

423. By renowned architect Sir Christopher Wren, of Portland Stone, it replaced an earlier church on the alignment of the Old London Bridge, comprising a landmark arrival monument on approach to London from the south. Re-built post-Fire, 1671-1687, it comprises a galleried rectangular aisled nave and defining west tower, one of Wren's most elegant, which is multi-staged and crowned by a hexagonal arcaded lantern, lead dome and steeple.

424. The church has architectural interest as a Wren church with later steeple and historic interest as the site of a medieval church which stood at the northern end of old London Bridge and as a post-Great Fire church. Despite the loss of the Old and re-orientation of the new London Bridge, and considerable setting change as London developed (and then declined) as a major international port, it still makes a medium contribution to significance as a result of a prominent relationship with the River, in particular on the old alignment of London Bridge from the Queen's Walk, and on approach from Gracechurch Street. The strong architectural and historic relationship with the Monument, also by Wren, adds to that significance.

Setting

425. The church is situated between the River Thames and Lower Thames Street, close to the northern end of London Bridge. Historically, the church on this site stood at the northern end of the old London Bridge. Today, the church is surrounded on all sides by 20th century commercial buildings, with large floor plates; it is neighboured by Adelaide House to the west, and St Magnus House to its east. The northern side of Lower Thames Street is similarly characterised by larger scale, commercial buildings. As such, the church is hidden from view from the northern end of London Bridge. The lantern and dome are seen in cross-river and wider views in conjunction with The Monument to the north (THVIA View 11).

426. The Development Site is occluded from view by intervening development and does not contribute to the church's setting.

427. The tall buildings within the City Cluster define the background skyline in views from the south bank, forming part of the wider setting of the listed building. The element of setting which contributes to the heritage significance of the church is its survival in its original location, indicative of its long history within the City. The evolving City Cluster does not detract from its heritage significance or appreciation of it.

Impact

428. The Development Site would be seen at distance from Church of St Magnus the Martyr from the south bank of the Thames (TVIA View 11). The view shows the Proposed Development to the right of the view which would appear in the middle distance, between the tall buildings of 50 Fenchurch Street (under construction) and 20 Fenchurch Street. The proposed tower would add to the layered quality of the view, appearing as part of the City Cluster of tall buildings, which forms a distinct background layer of townscape in the view and behind the Northern and Shell Building and St. Magnus House, which form an intermediate layer of medium rise townscape.

429. The proposal would preserve the setting and significance of the Church of St Magnus the Martyr and the ability to appreciate it.

St Dunstan in the East (Grade I) THVIA View B12

Significance

430. The listed building includes a tower and steeple by Wren, constructed between 1695-1721 and the ruins, following bomb damage, of a later church, built between 1817 to 1821, based on designs by David Lang. In 1967–71, the ruins of the church were transformed into a garden, incorporating the restored Wren tower.

431. The surrounding environment of the church has changed over time, with the churchyard now playing a significant role in the appreciation and understanding of the church, making a positive contribution to its significance.

432. The church's steeple is a material record of work in reconstructing city churches following the Great Fire. Views of the steeple of St Dunstan in the East, including from the riverside, as well as views shared with other Wren churches— St

Margaret Pattens, and St Mary-at-Hill, including from the Monument Gallery—also contribute to the church's understanding and significance.

433. The building has high historic and architectural interest as a ruinous early 19th century church, featuring a post-Fire steeple and tower designed by Wren.

Setting

434. The ruins of the Church of St Dunstan in the East lie within their associated garden but otherwise within a more modern setting informed by commercial buildings mostly dating from the 20th century onwards. There are clear views along aligned routes towards the tower from the south at Lower Thames Street, from the east along Cross Lane, and from the north along Idol Lane.

435. This modern setting of larger floorplate commercial buildings, particularly to the south and west do not contribute to the ability to appreciate and understand the heritage significance of the Church ruins within its garden setting. The prominent form of 20 Fenchurch Street is visible in the background of views of the church tower from St Dunstan's Hill, forming part of its backdrop. These modern elements of setting do not contribute to significance.

Impact

436. In View B12 of the THVIA the proposed development would introduce a new tall building to the north of the ruins and to the east of the tower and spire of St Dunstan in the East. It would form part of the southern part of the City Cluster with 50 Fenchurch Street to the east (under construction) and 20 Fenchurch Street to the west. In the cumulative scenario the proposed development would also be seen with 100 Leadenhall rising up within the background.

437. The foreground church of St Dunstan in the East would remain the focus of the view. The visible part of the proposed building would read as a continuation of the existing City Cluster, set in the distant background, visually separated from the church. The church tower and spire would still be able to be appreciated in the skyline and would remain unaffected by the proposed development.

438. The proposed development would not harm the setting or impact upon the heritage significance of this listed building of the ability to appreciate it.

<u>Church of All Hallows By The Tower Grade (I) if you have time THVIA B11</u>

439. The church was burnt and destroyed in WWII and was largely rebuilt to designs by Seeley and Paget. The brick tower dates from 1658-59. Elements of 15th century surviving aisle walls also. The two-storey northern porch and vestry dates from the late 19th century/early 20th century in an ornamental gothic style. Some of the original fittings from the old church survive including the canopied stone monument to Sir John Cooke dating from 1477. All Hallows also contains rare standing Anglo-Saxon fabric and Roman remains of a house with a tessellated floor surviving beneath the tower.

440. The church has architectural and historic interest as a post-Fire Wren City church, as much for its post-war rebuilding by Seeley and Paget, reflective of the changes to the built fabric of the City following WWII damage. The building also retains important surviving fabric from the Saxon and later medieval periods.

Setting

441. The setting is principally informed by its proximity and relationship to the Tower of London, and its modern day location on Byward Street which is a busy road route. To the east, Tower Hill Terrace informs an area of hardscape, which permits a clear visual span between the Church and the Tower to its east. It is otherwise surrounded by commercial buildings of a contrasting scale, Tower Place East informs its southern setting to the south of Gloucester Place. To the north of Byward Street, modern commercial buildings line the northern side of the road, ranging in architectural style and age.

442. The wider setting to the north and west of the church is informed by the tall buildings of the City Cluster. In particular, 20 Fenchurch Street is visible in the backdrop of the church tower in views from Gloucester Court and the public realm adjacent to the Tower of London.

Impact

443. THVIA View B11 shows that the proposed development would be largely occluded by 50 Fenchurch Street (under construction) and other intervening development including Minster Court with only a small portion of the top of the eastern part of the Proposed Development visible to its right and in the background. The foreground church of All Hallows by the Tower would remain the focus of the view.

444. Changes in its wider setting at the Site would not alter this immediate context, the ability to appreciate the listed church, or the character of its established wider setting as informed by the City Cluster.

445. The Proposed Development would have no effect on the heritage significance of this listed building, or the appreciation of that significance.

Conservation Areas

Leadenhall Market Conservation Area

Significance

446. The Leadenhall Market Conservation Area is a small conservation area centred on the Leadenhall Market and Lime Street and bounded by Gracechurch Street to the west. A small portion of the Site sits adjacent to the boundary of the Leadenhall Market Conservation Area where the western most edge wraps around the north west corner of the Site.

447. The Roman Forum-Basilica, the centre of the Roman town, was located between Cornhill and Leadenhall Street extending across Gracechurch Street, and its eastern half was therefore within the conservation area. The Forum was not only the centre of civic administration but also used as a market place. In the medieval period a lead-roofed mansion, known as the Leadenhall, was located on the site of the Forum and Sir Hugh Neville, the Lord of the manor allowed the grounds of the mansion to be used for a market. The Corporation of London acquired the land in the 15th century and Leadenhall became the most important London market.

448. In the 19th century, as the City became increasingly a focus for financial services, the bustling market stalls were deemed unruly and undignified in their present location. The Corporation of London eventually ruled that the meat and hide markets should be removed and that a new arcade be constructed to house the poultry market. The new Leadenhall Market was designed by Sir Horace Jones, City Architect, and was completed in 1881. The existing routes through the market place were retained, leading to a crooked cruciform shaped arcade.

449. The Market is Grade II* listed and underwent a programme of improvements in 1990-1. The other main route in the conservation area is Lime Street, which dates from the 12th century. Its development is intimately linked with the market and it remains connected.

450. The buildings in the conservation area date largely from the 19th century, when the market was redeveloped but the street pattern is far older, surviving from the early medieval period.

451. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance of the Conservation Area as derived from the vibrancy of the historic market, shops, the characterful Medieval street pattern, small scale of buildings, streets and spaces in dramatic contrast to the immediate setting.

Setting

452. Buildings on the western side of Gracechurch Street within the Bank Conservation Area are complementary to the scale and general appearance of buildings within the Leadenhall Conservation Area. Similarly, some buildings immediately east of it, the building at 40 Lime Street/ 4 Fenchurch Avenue, Sackville House on Cullum Street and other buildings on the northern side of Fenchurch Avenue, can be considered complementary to the buildings within the Lime Street and Fenchurch Street part of the conservation area.

453. Other than these elements of setting, there is typically a strong contrast between the small and well-preserved historic area covered by the Conservation Area and surrounding modern commercial and financial buildings. The Lloyds Building lies immediately to the north-east of the Conservation Area, with the taller Willis Building and 52 Lime Street adjacent. Some of the tallest buildings in the City, including the Leadenhall Building, 22 Bishopsgate and 8 Bishopsgate are 100-150m north of the Conservation Area. 20 Fenchurch Street lies opposite the southern boundary of the Conservation Area. The recently completed tall building at 40 Leadenhall Street lies to the Conservation Area's east, as does the lower modern building at 120 Fenchurch Street. The existing building on the Site, Fountain House, lies directly east of the Conservation Area. This post-war building does not form a positive aspect of the Conservation Area's setting.

454. The narrow approaches to the Market are a key component of views within the conservation area; the cruciform pattern of the Market building allows for important local views in and out. Each of these four arms is terminated by a Grade II listed building; terminating Whittington Avenue is 147-148 Leadenhall Street, terminating Leadenhall Place is 37-39 Lime Street, terminating the southern arm of the Market is the Ship Tavern and, glimpsed at the termination of the west arm of the Market, is the Gateway to the yard of St Peter's Church

on Bishopsgate. Large scale or tall buildings of post-war or modern origin therefore form an existing part of the immediate, local and wider setting of the Conservation Area.

Impact

455. Historic England has raised some concerns regarding the scale of the proposed tower, which has the potential to impact the setting of multiple designated heritage assets, including Leadenhall Market Conservation Area. It was considered that the development would have an adverse impact on the local historic environment around Leadenhall Market, by merit of its significantly increased scale and massing. Historic England go on to state that Leadenhall Market Conservation Area is currently experiencing a high degree of change, particularly in the scale of new towers being proposed around the central market halls, leading to an incremental erosion to the amount of natural light reaching the listed building. Historic England's comments are addressed below.

456. The application submission includes an Environmental Statement Volume I, Section 7 Ref: FCH-ARP-ZZ-XX-RP-EIA-000001 which covers daylight, sunlight and overshadowing. In the detailed assessment it covers impacts on Leadenhall Market and concludes that there would be a negligible impact overall with only additional shading from the Proposed Development in the morning between 8:00 GMT and 10:00 GMT from 21st March/September (equinox). During this time, however, these areas are already partially shaded by existing buildings and the additional shading from the Proposed Development would occur only for a short period of time. The rest of the year there would be no impacts. It was also concluded that the proposed development would have a negligible impact (not significant) on the hours of sunlight. The impacts of shadowing and hours of sunlight are not therefore harmful to the heritage assets setting, significance or result in any noticeable change to the experience of the internally naturally lit space of the central market halls.

457. Other heritage assets within the conservation area have been considered separately in the Heritage Section of this report including no.27 Lime Street (The Ship Tavern) and 37- 39 Lime Street. In each case it was concluded that the proposed development would not result in harm to their setting or significance or the ability to appreciate them.

458. The proposed tall building would be sited outside of but immediately adjacent to the Leadenhall Market Conservation Area and so would be a prominent new presence in some views into and out of it. Given the enclosed nature of the

Conservation Area, the proposals would have limited intervisibility with the market itself. The streets and spaces of the Conservation Area, which are characterised by a dramatic context in scale beyond its extents, would have a similar character and experience to the existing condition.

459. The proposal would appear most notably in views looking eastwards along Cullum Street, as demonstrated in view 35 of the THVIA. In this view the Proposed Development would be seen at the end of this east west stretch of Cullum Street. It would appear in front of 50 Fenchurch Street (under construction) and obscure that building from sight. While it would represent a substantial change to the view from this particular viewpoint and would appear in a dominant manner the appearance of the Proposed Development behind smaller scale historic buildings closer to the viewpoint would be consistent with the existing character of the view, albeit an intensification of it and with the character of the local area more generally. The buildings along Cullum Street are robust in appearance and form part of strong and consistent street frontages, and the Proposed Development would appear distinct and separate from them in this view, the proposals would clearly read as sitting beyond the extents of the medieval street pattern, in the immediate foreground of this view, the more historic character and appearance of the conservation would retain its primacy.

460. The Proposed Development's distinctive form and high quality of design would enhance the view over the existing configuration and the improved permeability provided by the new pedestrian route through to Fen Court Garden, which is visible in this view, would be a positive effect. This new route builds on the traditions of courts, alleys and quieter routes which characterise the Conservation Area and would enhance the pedestrian experience providing a new route and connection through to the conservation area.

461. Other views in which the tower would be seen from within the Leadenhall Market Conservation Area are from Leadenhall Place in THVIA View 33, Bull's Head Passage in THVIA 34 and the corner where Lime Street Passage Meets Lime Street in THVIA View 35. In each case the proposed development can be seen as part of the backdrop to lower scale buildings. The Proposed Development in these views would appear distinct and separate from the lower scale buildings in the conservation area and read as sitting beyond the extents of the medieval street pattern and the more historic character and appearance of the conservation would retain its primacy in these views.

462. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market Conservation Area or the ability to appreciate it.

Eastcheap Conservation Area

Significance

463. This conservation area straddles Eastcheap and extends south as far as Lower Thames Street. The conservation area is located approximately 110m from the Site, to its south-west, at their closest points.

464. The layout and plan form of the conservation area reflects its Saxon and medieval origins, with a series of lanes leading north from the Thames towards the City's principal thoroughfares and markets, although this relationship with the river has been severed by the 1960s widening of Lower Thames Street. Many of the building plots within the conservation area are narrow, reflecting their medieval predecessors. There are three churches in the conservation area, their spires and towers key focal points.

465. The Eastcheap Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance as an area as follows: An area which retains it irregular layout of medieval streets either side of the principal thoroughfare of Eastcheap, leading down to the River Thames; An area with strong historical connections to Billingsgate Market and the Thames; An area with significant survivals of post-Fire development including three Wren churches; A collection of notable listed buildings, as well as numerous unlisted buildings of high architectural quality from different periods; An area characterised by commercial and warehouse buildings; [and] An area of high archaeological potential for remains of all periods, where important Roman and medieval remains have been recorded.

Setting

466. The immediate setting of the Conservation Area includes tall and large-scale modern buildings. The 37-storey building at 20 Fenchurch Street lies to the immediate north and east of the Conservation Area, and the large-scale modern office buildings at 30 Fenchurch Street (formerly Plantation Place, 16-storeys) and the Minster Building (12-storeys) also border it. There is a strong sense of enclosure along Eastcheap, due to the scale of buildings lining that route. Views of tall buildings within the local and wider setting are possible along streets

aligned north-south within the Conservation Area. One of the key views mentioned in the SPD: 2. View north from St Mary at Hill to St Margaret Pattens Church, looks north in the direction of the Site. The City Cluster forms part of the backdrop of the Church in this view (THVIA View 24) although the development site is not seen within the view.

467. Large scale or tall buildings of post-war or modern origin therefore form an existing part of the immediate, local and wider setting of the Conservation Area.

Impact

468. The proposed tall building is not located in the conservation area, and it is situated on the north side of Fenchurch Street some way from the boundary but would impact on the setting of the Eastcheap Conservation Area in views looking north along St. Mary at Hill (THVIA View 24) and from Lower Thames Street looking northwards towards St. Dunstan in the East (THVIA View B12). The height, massing and architecture of the proposed building is typical of what characterises the existing wider setting and would not harm the character, appearance, setting or significance of the Eastcheap Conservation Area or the ability to appreciate it.

Creechurch Conservation Area THVIA View 23

Significance

469. The Conservation Area comprises the area bound by Bevis Marks to the north and is located approximately 200m from the Site, to its north-west, at their closest points.

470. The historic and architectural interest of the Conservation Area derives from a varied townscape and history with strong and visible connections to the Roman and medieval City. Anchored in three diverse and architecturally significance places of worship Bevis Marks Synagogue, St Katherine Cree, and St Botolph Aldgate, the area is closely associated with the Holy Trinity Priory, still evident in the modern street pattern, including historic open spaces of different scales and functions.

471. At the heart of the Conservation Area, is a characterful group of late 19th and early 20th century warehouses on Creechurch Lane and Mitre Street which are fine examples of a now rare building type in the City, with a number considered to be non-designated heritage assets.

472. The historic interest of the area is strengthened due to its enduring associations with the Jewish community since their resettlement in London in the 17th century, highlighted by Bevis Marks and the sites of the First and Great Synagogues. The area juxtaposes contrasting architectural scales against the backdrop of the City Cluster's tall buildings.

Setting

473. The immediate setting of the Conservation Area comprises a variety of scales and styles of buildings with modern development being prevalent. Tall buildings of the City Cluster including 70 St Mary Axe, 30 St Mary Axe, 100 and 110 Bishopsgate form part of the immediate and wider setting of the Conservation Area to the west. In general, this juxtaposition of contrasting architectural scales of the Conservation Area against the backdrop of the City Cluster's tall buildings, defines the setting and contributes to the significance of the Conservation Area. The existing building is immediately on the boundary and clearly visible and is not considered to make any contribution to the significance of the conservation area.

Impact

474. Views of the proposed development are very limited from within the conservation area due to the intervening towers of the City Cluster which occlude it from view. The location where the tower can be seen is from southern edge of the conservation area along Aldgate High Street and parts of Aldgate Square (THVIA View 23). The top of the Proposed Development would appear in the centre of the image, behind the lower part of 40 Leadenhall. It would appear in front of 20 Fenchurch Street and largely obscuring that existing tall building from view, and in the sky gap between the under-construction 50 Fenchurch Street and the taller part of 40 Leadenhall Street, at a lower apparent height than both.

475. The expression of the Proposed Development elevations as a series of slender vertical bays would be appreciable to some extent in this view, as would the three dimensionally 'folded triangles' at the top of the south tower which would provide the Proposed Development with a distinctive crown. Some areas of plant would be visible above the crown from this direction, enclosed in a mixture of translucent glazing and shadow box such that they would be unobtrusive.

476. The Proposed Development would represent a relatively small change to the view, consistent with its existing character of the taller buildings of the City Cluster.

477. The height, massing and architecture of the proposed building is typical of what characterises the existing wider setting and would not harm the character, appearance, setting or significance of the Conservation Area or the ability to appreciate it.

Lloyds Avenue Conservation Area

Significance

478. This is a small conservation area located approximately 100m from the Site, to its east, at their closest points. The Conservation Area is of architectural, historic, artistic and archaeological significance. This significance is summarised in the Lloyd's Avenue Conservation Area Character Summary and Management Strategy SPD as:

- an area with a rich history spanning a number of periods, relating to the medieval church of St Katherine Coleman; the East India Trading Company; and Lloyd's Register of Shipping centred around the irregular sweep of Lloyds Avenue, redeveloped in the Edwardian period into a fashionable row of larger speculative office buildings in the then established traditional City livery of Portland Stone-faced free classism then associated with serious and dependable.

- the landmark presence (in architectural and historic terms) is the Lloyd's Registry of Shipping occupying the corner at the northern end, in addition to its remarkable extension by Richard Rogers in the livery of his practice and in the sort of dramatic contrast which is at the heart of the City Cluster. the SPD references the private sunken garden on Northumberland Alley outside the conservation area which contributes to the peaceful and secluded character of the alley and contrasts to the busy thoroughfare of Fenchurch and classical grandeur of Lloyds Avenue.

Setting

479. The natural topography provides a range of views into, out of, and within the conservation area. Taller buildings including the eastern cluster are often glimpsed in the background and terminate Northumberland Alley and Lloyds Avenue particularly 30 St Mary Axe. These contrasting visual experiences provide a dramatic change in scale and a setting which contrasts the historic with the contemporary City as a centre for trade and commercial activity. These

elements of setting make a neutral contribution to the significance of the conservation area but have townscape value.

480. The southernmost fringe is defined by Fenchurch Street Conservation Area and the railway arches, and this provides an intimate industrial and enclosed setting which makes a positive contribution in terms of the historic expansion of this part of the city through industry and trade.

481. Largely the site is framed by 1980s and more contemporary commercial buildings which make a neutral contribution to significance the exception to this is the private sunken garden and street trees and greenery to the Northumberland Alley are noted in Lloyds Avenue Conservation Area SPD. This is a soft and lush fringe to the eastern boundary which is loosely related to the former Rangoon Street, and this enhances the has more peaceful and secluded townscape character of the alley in contrast to the busy thoroughfare of Fenchurch Street, but does not contribute to the historic, architectural, or artistic values of the conservation area which are central to significance.

Impact

482. Views of the proposed development are very limited from within the conservation area due to the narrowness of Lloyds Avenue where the existing buildings occlude the view of the existing Site and proposed tower. The location where the tower can be seen is from northern edge of the conservation along Fenchurch Street where the proposed development would come into view as the viewer walks east to west.

483. The top and southern façade of the Proposed Development would start to appear behind 120 Fenchurch Street opposite the emerging tower at 50 Fenchurch Street of similar height.

484. The expression of the Proposed Development elevations as a series of slender vertical bays would be appreciable to some extent in this view, as would the three dimensionally ‘folded triangles’ at the top of the south tower which would provide the Proposed Development with a distinctive crown.

485. The Proposed Development would represent a relatively small change to the view, consistent with its existing character of the taller buildings of the City Cluster.

486. The height, massing and architecture of the proposed building is typical of what characterises the existing wider setting and would not harm the character, appearance, setting or significance of the Lloyds Conservation Area.

Non-Designated Heritage Assets

487. Non-designated heritage assets are buildings, monuments, sites, places, areas, or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritages assets.

488. The guidance in Historic England's Advice Note 7: Local Heritage Listing has been used to assess whether there are assets on the site or in the area that have potential for non-designated heritage asset status. Numbers 40 Lime Street and 4 Fenchurch Avenue and Fen Court Garden were identified to have such status as a result of that scoping exercise.

40 Lime Street and 4 Fenchurch Avenue THVIA Views 30 and 31

Significance

489. The office block was designed by Henry Tanner junior and constructed between 1939 and 1940 to replace a series of office buildings of the late C19. The building is faced in Portland stone to the street-facing elevations and glazed brick to the rear. Granite surrounds to the principal entrances, several with bronze panel reveals. Above the frontispiece are the carved arms of the Carpenters' Company, who laid-out the street at the end of the C19. At the corners, the building is chamfered, with double-height architraves with projecting keystones and a stylised sculptural relief panels featuring a Medieval ship motif, set between the first and second-floor windows. This pattern is repeated on the principal façade and side returns. There are three principal storeys, with six stepped-back upper storeys five of which are original to Tanner's design, the top floor having been added in 1968.

490. The building has significance as a building designed by a notable architect of commercial office buildings in London. The building has architectural and historic interest for its stripped Neo-Classical style with Art Deco influence and as a good example of an inter-war office building in the City of London. Lime Street emerged as the dominant centre in the City for maritime insurance and related financial services for shipping companies and was likely the influence for the Medieval ship motifs found on the building. The building also has group value

with the adjoining office block, 37-39 Lime Street (Grade II) of a similar scale, which was built in 1929 and makes a positive contribution along the historic route of Lime Street.

Setting

491. The office block is located outside of the of the Leadenhall Market Conservation Area, with the boundary drawn on its south side along Lime Street. It occupies an irregular shaped end plot between Lime Street, Fenchurch Avenue and Fen Court, immediately east of the Lloyd's Building and adjoining 37-39 Lime Street (Grade II) to its south. The building encloses Fen Court Garden to its rear on its north and western sides which has been identified as another non-designated heritage asset.

492. Lime Street, Fenchurch Avenue and Fen Court Garden form the principal setting of this building, Lime Street is of medieval origin and takes a meandering route to connect Leadenhall Street and Fenchurch Street. Numbers. 37-39 (grade II) sits adjacent to the building to the south and surrounded by modern office buildings including The Lloyd's Building (Grade I) and the Willis Building, both close to the north, demonstrate the ongoing development of the City. 30 St Mary Axe, 52 Lime Street and 20 Fenchurch Street are visible in longer views north and south along Lime Street and the top of 120 Fenchurch Street and the under-construction building at 50 Fenchurch Street are visible in views from Leadenhall Place towards the listed building looking east, providing an established wider setting defined by tall buildings.

Impact

493. The Proposed Development would be appreciated in the backdrop of the office block from Lime Street and the corner with Fenchurch Avenue THVIA View 30 and from Fenchurch Avenue opposite Fen Court in THVIA View 31.

494. The Proposed Development would appear in the background of the view, in front of and partly obscuring 50 Fenchurch Street (currently under construction) in THVIA view 31. While a considerable new visual presence to the rear of 40 Lime Street and 4 Fenchurch Avenue, in this context the Proposed Development would be consistent with the overall character of the existing view, in which modern larger scale buildings are seen behind historic smaller scale buildings.

495. The high-quality design of the Proposed Development with simple glazed facades with metal frames would form a calm backdrop for the non-designated

heritage asset building in the foreground, and the angling of the top edge of the uppermost glazed panels would provide the northern tower with a restrained yet distinctive crown.

496. Officers consider that the Proposed Development would not result in harm to the setting or significance of 40 Lime Street and 4 Fenchurch Avenue or the ability to appreciate it.

Fen Court Garden Including Three Chest Tombs THVIA View 30

Significance

497. Fen Court Garden is a small open space to the west of Fen Court and immediately north of the Site. The garden occupies the site of the former St. Gabriel Churchyard, the church having been lost in the Fire of London in 1666. Several tombs from the former churchyard remain and have been incorporated into the open space with later relandscaping, benches and planting. The garden now houses the sculpture Gilt of Cain, a memorial to victims of the Slave Trade by Michael Visocchi and Lemm Sissay, unveiled by Archbishop Desmond Tutu in 2008.

498. Fen Court Garden and the remaining chest tombs within it are of heritage significance for their location on the site of the former St. Gabriel Churchyard and as a physical link to that historic use.

Setting

499. Fen Court Garden is surrounded on all sides by 20th century, post-war and modern buildings of medium to large scale, with the pedestrian route of Fen Court located to its east. As a hard landscaped space with modern sculpture and furniture, it no longer resembles a churchyard, with the chest tombs the main reminder of this former use. The principal aspect of setting that contributes to its significance is its largely enclosed nature, which has been the case since the rebuilding after the Great Fire of London.

Impact

500. Historic England has raised some concerns regarding the scale of the proposed tower on Fen Court Garden. They state that Fen Court is a small space which is highly susceptible to loss of light and encroachment from surrounding development. The increased height and bulk of the proposed tower appears

likely to further restrict the natural light reaching this space, when considered in relation to the existing podium and tower.

501. The application submission includes an Environmental Statement Volume I, Section 7 Ref: FCH-ARP-ZZ-XX-RP-EIA-000001 which covers daylight, sunlight and overshadowing. In the detailed assessment it covers impacts on Fen Court and concludes that the Proposed Development would result in a significant adverse overshadowing effect to Fen Court Garden. Notwithstanding this it should be noted that 50 Fenchurch Street (currently under construction) alone would result in the same impact (none of Fen Court Garden receiving two hours of direct sunlight on 21st March) and result in the same significant adverse overshadowing effect. Once 50 Fenchurch Street is complete, the Proposed Development would sit within its shadow. No more harm to Fen Court in terms of shading and sunlight would therefore result beyond that which has already been previously approved at 50 Fenchurch Street.

502. The Proposed Development would be seen directly to the south of Fen Court Garden and west of Fen Court, and behind 120 Fenchurch Street and 4 Fenchurch Avenue in THVIA View 30.

503. The backdrop of the southern end of the garden will change significantly with the proposed new tower. The southern end of the garden will remain enclosed by development however where there is currently a podium element of two storeys the townscape gap above will be enclosed by the tower. This will lose much of the townscape gap appreciable from within the garden except for the access road of Fen Court.

504. While it would represent a substantial change to the view from this particular viewpoint, the appearance of the Proposed Development would be consistent with the existing character of the local area with smaller scale buildings and open spaces seen against the backdrop of the towers of the City Cluster.

505. Fen Court Garden would be more enclosed by the proposed development but unchanged in footprint except for improved access the proposed pedestrian link to the southwest corner with Cullum Street providing a more direct route. The monuments, planting, hard landscaping and memorial, which contribute greatly to the significance of the NDHA, would remain unchanged with no physical alterations proposed to the space.

506. The Proposed Development’s distinctive form and high quality of design would enhance the view over the existing configuration and the improved permeability

provided by the new pedestrian route through to Fen Court Garden, which is visible in this view, would be a positive effect. This new route builds on the traditions of courts, alleys and quieter routes which characterise the Conservation Area and would enhance the pedestrian experience providing a new route and connection through to the conservation area and will provide greater access to the garden.

507. The proposed development is not considered to cause harm to the setting or significance of the Fen Court Garden.

Other Heritage Assets

508. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate and unrealistic to assess them all.

509. Officers have undertaken a scoping exercise to explore the intervisibility quality of association/disassociation of the proposals with designated heritage assets in the surrounding locality, to discern the potential for impacts. This assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance.

510. Some assets were scoped in and these have been fully assessed above. In accordance with paragraph 201 of the NPPF a number of heritage assets were scoped out of further assessment, accounting for their significance and contribution of setting to that significance.

511. This is because they either would have nil to very limited intervisibility with the proposals, with any perceptible visual change amount to a *de minimis* visual effect, or because there would be clear visual disassociation between the asset and the proposal, with the latter being, while visible, clearly belonging to background layers of modern city development – a presence that might be seen but crucially not *felt* as part of the experience of the significance or setting of that asset.

512. In all cases it was, for these reasons, judged by officers that the proposals would have no potential impact. The assets scoped out include:
    - 7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):

- Church of St Edmund the King, Lombard Street (Grade I)
- 13-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II*)
- Church of St Michael Cornhill (Grade I)
- Church of St. Peter Cornhill
- Church of St Clement, (Grade I)
- Church of St Edmund the King (Grade I)
- Church of St Mary Woolnoth (Grade I)
- Church of St. Olave (Grade (I)
- Mansion House (Grade I)
- St Peter Upon Cornhill (Grade I)
- Chapel Royal of St Peter ad Vincula (Grade I):
- Royal Exchange (Grade I)
- Merchant Taylors Hall (Grade II*)
- No. 10 Trinity Square (Formally Listed as Port of London Authority Building) (Grade II*)
- Tower and Remains of Church of All Hallows Staining (Grade I)
- 66 and 67 Cornhill (Grade II)
- 2a; and 23 and 25 Eastcheap (Grade II)
- 48 Bishopsgate (Grade II)
- 40 Threadneedle Street (Grade II)
- Iron Gates in St Benet's Place (Grade II)
- 4 Brabant Court (Grade II)
- St. Mary at Hill No. 16 (Grade II)
- St Mary At Hill Nos 17 And 18 (Watermen's Hall) (Grade II*)
- 2-3 Philpot Lane (Grade II)
- 7-8 Philpot Lane (Grade II*)
- 81-82 Gracechurch Street (Grade II)
- 7-9 Gracechurch Street (Grade II)
- 20-21 Billiter Street (Grade II)
- 71 Fenchurch Lloyds Register (Grade II*)
- 38 Lombard Street (Grade II)
- 39-40 Lombard Street (Grade II)
- 27 Great Tower Street (Grade II)
- Barbican (Grade II, Grade II* RHPG)
- Finsbury Circus CA and RPG (grade II)
- Bank Conservation Area

- Various listed buildings not referenced in the assessments above within the Eastcheap, Guildhall, Finsbury Circus, St Helen's Place and Tower Conservation Area (London Borough of Tower Hamlets).

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

Conclusion on Heritage

514. The proposals would preserve the special architectural and historic interest, significance and setting of all relevant designated heritage assets and identified non-designated heritage assets in the vicinity identified in the THVIA, and the settings or significance of the Leadenhall Market, Eastcheap, Creechurch, Lloyds Avenue Conservation Areas.

515. The proposal would not harm the setting of any designated and non-designated heritage assets and would not detract from LVMF, townscape, riverscape, skyline, protected views and views into and out of the surrounding conservation areas and would therefore comply with Local Plan policies CS12, CS13 and DM12.1, emerging City Plan 2040 policies S11, S13, HE1, and London Plan policies HC1, HC2, HC3 and HC4.

Archaeology

516. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest. The City of London Local Plan 2015 states that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks

517. The site does not contain any Scheduled Monuments and it does not lie within a Designated Archaeological Area (as defined by the Ancient Monuments and Archaeological Act 1979). 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 states that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

518. An archaeological ES chapter and desk-based assessment has been submitted as part of the planning application (Mills Whipp 2025). An archaeological evaluation was also carried out on the site in advance of the planning application being submitted (PCA 2024).

519. The ES and DBA identified that the site lies close to the centre of the Roman Provincial capital of Londinium, to the east of the Basilica – Forum complex. Substantial Roman buildings have been found in the area, most recently at 50 Fenchurch Street, and a Roman road may have crossed the site on the western side. In the late 14th century a garden was converted into a graveyard for St Gabriel's to the north of the site, although burials are not anticipated to extend onto the site itself. The whole site was destroyed in the Fire of London 1666 but soon rebuilt with dense houses, yards and alleys. Much of the site was destroyed in the Second World War.

520. The present building was erected by 1958 with additions in 1970. The archaeological evaluation identified heavily truncated traces of Roman features in the south-western part of the side and on the east. In the north the basements were shallower but extensive modern foundations were present. Post-medieval and medieval deposits were found in this area and augering suggests Roman features may be present at depth. The proposed new basement floors would remove any surviving archaeological deposits across the site.

521. The Greater London Archaeology Advisory Service have reviewed the application and upon review are satisfied that although the evaluation found material of Roman and post-medieval date, it did not identify any highly significant remains. Therefore, archaeological conditions are proposed to secure a written scheme of investigation, a detailed programme of works, a programme for delivering positive public benefits (should any items be found) and a scheme to secure appropriate foundation designs.

522. With regard to the ES and the potential significant effects of the proposed development for well-preserved Roman structural remains of high heritage significance general development may result in a direct, permanent, major adverse significant effect. Equally, for isolated Roman residual finds of low heritage significance development may result in a direct, permanent, moderate adverse significant effect.

523. As buried heritage assets are an irreplaceable resource, it is standard practice within the planning system to implement measures to mitigate any level of adverse effect on a buried heritage asset, including effects considered 'minor adverse' and 'negligible'. While the potential impact to these assets are hypothetically considered major adverse (significant) the proposed conditions recommended by GLAAS would seek to identify any assets in place and protect them therefore preventing any significant impacts.

524. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

Public Access and Inclusivity

Policy Context

525. 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 emerging City Plan 2040 policy HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.

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

Arrival at the Site

527. The site is well-served by public transport, including London underground from Bank and Monument, national rail links from Fenchurch Street and Cannon Street and buses from Eastcheap, Cannon Street and King William Street. It is noted that neither Bank or Monument are step free and the closest step free

underground station is Liverpool Street Station, all public transport nodes exceed the recommended 50m travel distances without a rest.

528. Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. The closest taxi rank is located on Mincing Lane which is approximately 100m from the site. No specific drop-off points are identified as part of the proposal however informal drop-off anticipated along Cullum Street which is within 50m of the site.

529. The walking distances from key public transport nodes and on-street carparking exceed the recommended 50m without a rest. It is therefore recommended that opportunities for such resting points with accessible seating are explored, at maximum intervals of 50m along the approaches to the building from key points of arrivals. Exploring such opportunities and their feasibility is therefore included within the scope of the s278 and s106 agreement being secured.

530. An accessible parking space would be provided on site within the loading bay accessed directly off Cullum Street. The parking space would be for staff only and visitors to the building would be expected to use the two existing on-street parking spaces along Mincing Lane approximately 100m south of the site. Officer users would be able to access the office entrances by exiting the building and moving around the building externally via either Cullum Street or the new public route. Further details of management and design of this entry point and potential Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.

531. A Travel Plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.

532. Continuing provision of the existing Blue Badge space in the area during construction is important provided it is safe for use, and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Public Realm

533. A new publicly accessible route is proposed through the city block, creating a step free route between Cullum Street and Fen Court Garden. The new route would be sloped to ensure there is level threshold into the retail entrances and

cultural entrance. The new route would be designed to be welcoming and safe, through the integration of lighting, natural surveillance from the active ground floor uses and clear slight lines. Further detail would be secured via condition

534. The setting back of the building at the lower levels would create more generous pavement widths around the base of the building. Where new thresholds are created these will be level and step free. The new public realm should be designed in line with the Mayors Public London Charter and further detail regarding the hard and soft landscaping will be secured via condition.

Cycle and End of Trip Facilities

535. The long stay cycle parking would be accommodated on the mezzanine of basement level 01 and is access via a sliding door directly off Cullum Street. The internal access to the cycle store is via cycle lift, one lifts is provided, and two staircases. All gates and doors along the route would be automated and sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users. Further detail would be secured via condition.

536. Routes from the cycle store to end of trip facilities, located on basement 01, would be via steps and dedicated end of trip shuttle lift. Access from the cycle store and EoT facilities to the office receptions on either ground or mezzanine would be via the dedicated EoT shuttle lift, providing a logical and accessible route. All doors along routes would be automated or power assisted. Two accessible showers would be provided directly off the EoT lounge lobby, in close proximity to the lifts, providing an accessible shower, toilet and lockers, further detail would be secured by condition.

537. Short stay cycle parking would be accommodated in the public realm around the base of the southern block, with a mixture of standard and accessible Sheffield stands.

538. It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. 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.

Entrances and Arrival Experience

539. London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to in line with inclusive-design best practice guidance.

Office

540. The primary office entrances along Fenchurch Street and Fen Court are formed by two large drum barrel doors. The use of automated large drum doors would provide entrances into the office which are easily identifiable and allows a wide range of people to use the same entry point independently without additional effort, separation or special treatment.

541. The ground floor office lobby is arranged over two levels which are navigated via five steps or retracting staircase platform lift. The platform lift should be designed for independent use any associated signage and wayfinding should be logical and inclusive. Further detail will be secured by condition and the IAMP.

542. 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.

543. Due to limited space at ground floor not all lifts come to ground, and office users would either access the lift cores via the security gates at ground floor or via the mezzanine level reception. Prior to the security line the mezzanine level reception is accessed either by steps or escalator and no step free route is provided prior to the security line. Step free access to the mezzanine level reception would be via the southern lift core access via ground floor. Users who require access to the northern lift core would be required to transfer at the mezzanine level, users would not be required to navigate the security barriers more than once. Wayfinding and management of the lifting strategy will be secured via condition and IAMP to ensure the routes are logical and easily identifiable.

544. 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 would be provided through condition.

Cultural Provision

545. The primary entrance to the cultural spaces would be via a drum door located on the corner of the north building along Cullum Street adjacent to the new public route through the building. The security line will be located internally and is formed of a double leaf swing door, this door should be automated, and further detail will be secured via condition. From the entrance lobby visitors will be transported up to either level 17 or 20 via two lifts. The access to both the cultural space and level 20 viewing terrace have been designed to be welcoming, inviting and inclusive with security at a minimum under the current security threat. The access and experience will be required to meet the aspirations of the Mayors Public London Charter and further details on inclusion measures will be provided within the IAMP.

Retail and F&B

546. The entrances to both the retail unit and the F&B spaces associated with the ground floor office would be formed of double leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Further detail will be secured via condition to ensure that the entrances are easily identifiable and logical.

547. The F&B unit is arranged over two levels which are navigated internally via two step or a platform lift. The platform lift should be designed for independent use any associated signage and wayfinding should be logical and inclusive. Further detail will be secured by condition and the IAMP.

Vertical Movement

548. 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. Both the cultural and office accommodation will be served by two FF lifts and two EVAC lifts. Further detail

regarding the design, management and maintenance of all lifts will be secured via condition.

Evacuation and Fire Safety

549. All fire escape routes are step free through the use of EVAC lifts, slopes and ramps. All gates and doors along the route would be automated sized in accordance with Approved Document M and ramps and corridors would be sized accordingly to allow a minimal 1500mm clear width and handrail in line with Approved Document M and K.

550. Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

Horizontal Movement

551. 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.

Terraces and Landscaping

552. Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.

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

554. All terraces should be designed to meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

555. Spend areas for assistance animals are not currently identified but will be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

Office

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

557. Two types of terraces are proposed with linear terraces at lower levels and larger terraces at upper levels. The linear terraces would have no fixed furniture and where loose furniture is introduce this should ensure that a minimum clear width 1500mm is maintained. The balustrade height around the linear terraces would be formed of 900mm planter with a 500mm mesh screen above.

558. The larger terraces found levels 28, 29, 30 and 31 would have integrated fixed seating into the planters, this seating should be designed to incorporate a range a seat heights, backrests and armrests. Where loose furniture is introduced, this should ensure that a minimum clear width 1500mm is maintained. The balustrade would be fully glazed and at a minimum height of 1500mm allowing for opportunities to views out from the terrace for a range of users.

559. Further detail regarding the planting strategy and balustrade design will be secured via condition to ensure that there is an equal opportunity to a view and that the planting is not overly scented and that unwanted touch is avoided.

Cultural Provision

560. The terrace doors out onto public viewing terrace and cultural terrace are formed of double leaf swing doors and single leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via IAMP.

561. The detailed design for the level 17 terrace and level 20 public viewing terrace should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. Where seating is integrated into the planting it would be designed to allow wheelchair users to sit alongside and transfer. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

562. The balustrade height around the public terraces would be formed of 600mm planter with a 2200mm glazed screen above, allowing for opportunities to views out from the terrace for a range of users.

Sanitary Facilities

563. Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry.

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

Office

565. It is confirmed that an accessible toilet will be provided within the ground floor office reception lobby prior to the security line. The upper levels will cluster the sanitary provision around the cores, providing both ambulant and accessible toilets. The sanitary provision varies in location, arrangement and provision as you move up the building. The sanitary provision for the office floor accommodation would provide a mixture of gendered and non-gendered WC's in accordance with approved document Part T and at least one accessible WC and two ambulant WC's per floor. Further detail will be secured via condition.

Cultural Provision

566. The sanitary provision for the cultural space includes three toilets including one accessible on each of the upper levels of accommodation, no sanitary facilities are provided at ground floor and no baby changing facilities have been included. Further detail regarding how baby changing facilities, ambulant toilets and ground floor sanitary facilities can be integrated will be secured via condition.

Retail and F&B

567. Both the retail unit and the F&B unit would have a single accessible toilet which is accessible from the entrance level, further detail will be secured via condition.

Cultural Provision

568. The proposal includes internal and external cultural space at level 17 and level 20 including a public viewing terrace.

569. The internal arrangement of the cultural space should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured by condition, the IAMP and S106.

570. An end-user has not been identified for the culture use and conditions are imposed to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

571. An obligation for Inclusive Procurement has been made under the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

Signage and Wayfinding

572. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of ‘two senses’. Details of signage and wayfinding will be secured by condition.

Access and Inclusivity Conclusion

573. The proposal has been designed to ensure that the site meets the highest standard of inclusive design in line with Local Plan DM10.8 and London Plan Policy D5. In order for the proposed office, retail and cultural uses to fulfil its goal of being an inclusive and welcoming place to work and visit, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the accessibility of the site in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Inclusive Access Management Plan, it is

considered that the proposal accords with the access related policies outlined above.

574. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Highways and Transportation

Surrounding Highway Network, Site Accessibility and Proposed Development

575. The site is situated on the southern edge of the City Cluster, within a designated tall building zone. It is bordered by Fen Court Garden to the north, Fen Court to the east, Fenchurch Street to the south, and Cullum Street to the west. Along its northern boundary, the site shares a party wall with adjacent properties within the Lime Street Estate and 34 Lime Street.

576. Fenchurch Street serves as an important east-west thoroughfare, connecting Aldgate in the east with Gracechurch Street to the west. Gracechurch Street, in turn, functions as a key north-south route within the local area. The site benefits from excellent public transport accessibility, with numerous bus stops, underground, and mainline train stations nearby. Additionally, a network of pedestrianised streets and alleyways provides convenient shortcuts and links to surrounding urban amenities.

577. The existing site comprises of an office development of approximately 13,957 sqm (GIA), including ancillary retail space at ground floor level. It also features a basement car park with 20 spaces and servicing facilities, accessed via Cullum Street. In 2019, planning permission (reference: 16/00809/FULMAJ) was granted for a redevelopment scheme, although this consent lapsed in 2022. The approved proposal included around 36,500 sqm (GIA) of office space (Use Class E(g)(i)) and approximately 450 sqm (GIA) of retail space (Use Class E). The scheme incorporated a ground floor service yard accessed from Cullum Street, where—due to the street's constrained layout and in line with existing conditions—servicing vehicles would have been required to reverse into the yard.

578. *Comparison of Existing and Proposed GIA*

Use Type	Existing GIA (sqm)	Proposed GIA (sqm)
Office (Class E9(g))	13,957	57,491

Culture (Class F1/E)	n/a	569
Public viewing gallery (Sui Generis)	n/a	644
Flexible Retail	n/a	370
Retail (Ancillary)	Included in office	450
Plant		10,480
Total	*13,957*	*69,553*

579. The proposed development would demolish all existing buildings and structures to redevelop the site and provide a total floor area of 69,553sqm GIA, comprising 57,491sqm office floor space.

Trip Generation – Pedestrians

580. The trip generation methodology has been developed using a combined data from Census and the TRICS database, supplemented by manual adjustments to mode share distributions. The existing site, including the ground floor retail unit, has been assessed as employment-generating floorspace. It is assumed that trips associated with the retail component primarily consist of incidental pedestrian visits.

581. Mode share data for all journey purposes during the AM and PM peak periods has been extracted from TRICS for office-related arrivals and departures. To ensure the methodology reflects local travel behaviour and public transport accessibility, the TRICS-derived mode shares have been adjusted using data from the 2011 Census 'Method of Travel to Work' dataset. This approach is consistent with methodologies adopted in previously approved developments within the area, thereby ensuring continuity and comparability in the assessment process.

582. The adjustment of transport mode shares was based on Census data for the City of London 001 MSOA. Rail-based trips were split into 41% London Underground and 59% National Rail. Bus, cycling, and walking shares remained as per TRICS data. All other modes were proportionally adjusted using Census data to better reflect local travel patterns. Peak period trip rates are detailed in Table 6-4 of the transport assessment.

Table 6-4: Existing site Total Person Trip Rates (per 100sqm) and Total Person Trips (13,957sqm GIA)

TIME	TOTAL PERSON TRIP RATES			TOTAL PERSON TRIPS		
	ARRIVALS	DEPARTURES	TOTAL	ARRIVALS	DEPARTURES	TOTAL
AM Peak	3.3	0.4	3.6	455	49	504
PM Peak	0.2	2.8	3.1	536	62	598
Daily Total	**11.1**	**11.0**	**22.1**	**1,555**	**1,532**	**3,087**

583. The proposed development is expected to increase pedestrian activity along the adjacent footways. To ensure a robust and methodologically sound assessment, the analysis has been based on the net trip generation figures presented in Table 4-4 as shown below and extracted from the transport assessment. This approach focuses on the net change in pedestrian movements rather than the total number of trips, providing a more accurate reflection of the development's potential impact on the pedestrian network.

584. During the morning peak period, the development is projected to generate approximately 2,445 total additional trips, of which 1,941 are net new pedestrian movements. These figures include trips made on foot, including those accessing nearby public transport facilities.

585. Trip distribution across the local pedestrian network has been determined using origin-destination data from the Census.

586. The projected office travel demand was estimated using the same total person trip rates applied in the assessment of the existing conditions. The forecast number of employee and visitor trips associated with the office use is presented in Table 6-9, as extracted from the submitted Transport Assessment.

587. Due to the small scale of the retail unit, it is anticipated that it would primarily attract pass-by pedestrian trips, and as such, has not been assessed in detail. This approach has been considered acceptable.

588. The public space is expected to operate with varied opening hours. However, it is not anticipated to generate significant demand during traditional peak periods. Most visitors are expected during evenings and weekends, with travel predominantly by sustainable modes.

Table 4-4: Forecast Development Pedestrian Trips by Mode - AM Peak (08:00 – 09:00)

MODE OF TRAVEL	AM 0800-0900			PM 17:00 -18:00		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Underground, metro, light rail or tram	557	12	569	442	10	452
Train	813	18	832	639	14	653
Bus, minibus or coach	245	5	250	194	4	198
Taxi	7	1	8	5	1	6
Motorcycle, scooter or moped	0	0	0	-4	-1	-4
Driving a car or van	0	0	0	-5	-1	-6
Passenger in a car or van	0	0	0	-1	0	-1
Bicycle	298	14	312	253	14	267
On foot	287	188	475	228	148	376
Total	**2206**	**239**	**2445**	**1751**	**190**	**1941**

Table 6-9: Forecast Total Trips (67,694sqm (GIA))

TIME PERIOD	ARRIVALS	DEPARTURES	TOTAL
AM Peak (08:00 – 09:00)	2,206	239	2,445
PM Peak (1700 – 1800)	137	1,929	2,066

Pedestrian Comfort Levels (Pedestrian Footway Assessment)

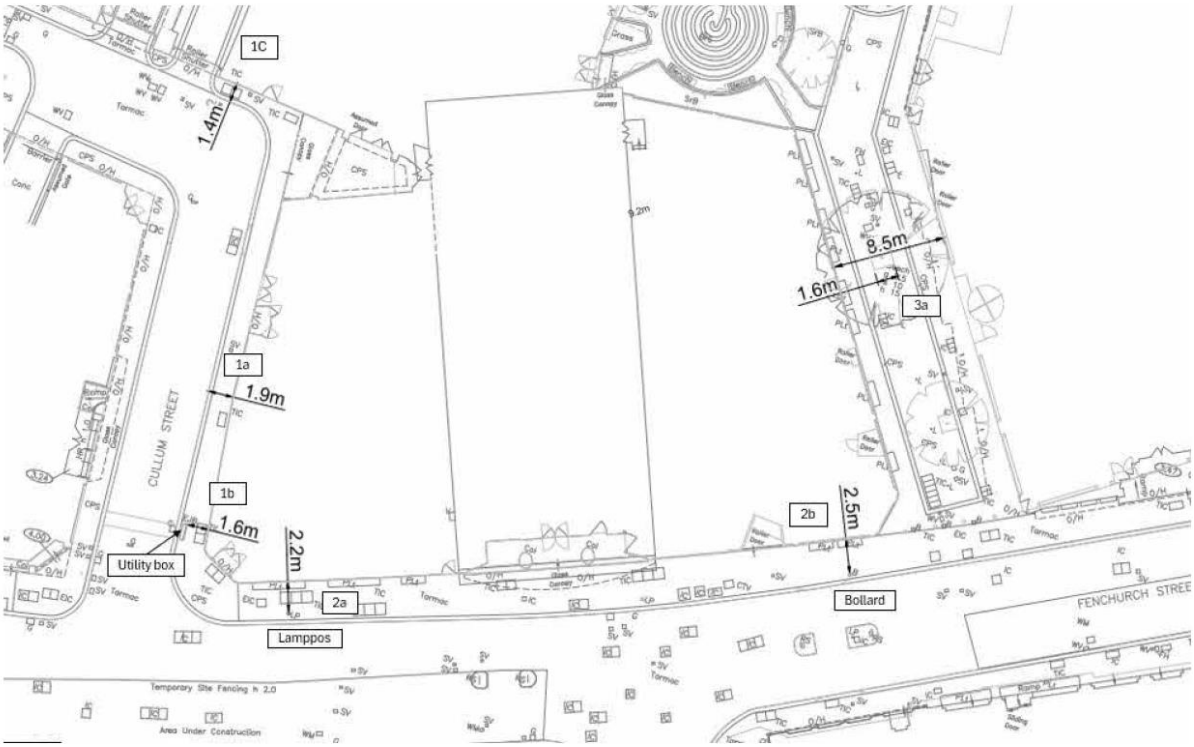
589. Pedestrian Comfort Level (PCL) is a measure used to assess how comfortable and safe a pedestrian environment is, particularly in terms of space and flow. It is commonly used to evaluate footway conditions and ensure they meet the needs of pedestrians.

590. PCL levels range from A to E, representing varying degrees of suitability for pedestrian movement. These levels are categorised as: comfortable, acceptable, at risk, and unacceptable/uncomfortable.

591. The PCL assessment was included within a comprehensive section of the transport assessment, to determine the existing and proposed comfort levels in the vicinity of the development. The assessment followed Transport for London's (TfL) guidance document Pedestrian Comfort Level Guidance v2 (2019).

592. The figure below (extract of the transport assessment) shows the PCL assessment locations and associated footway widths for the existing situation.

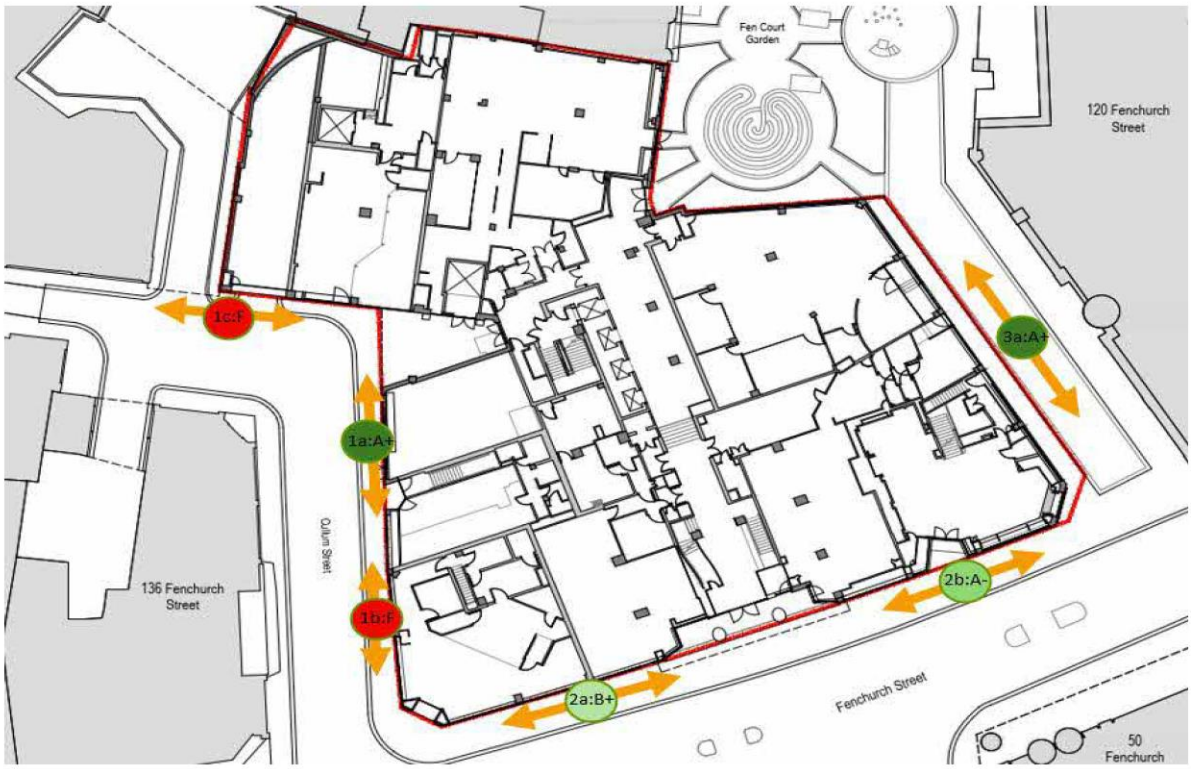
Figure 4-1: Footway Assessment Locations and Existing Widths



593. Footway widths were surveyed at four strategic points around the site, capturing both standard dimensions and any pinch points where relevant. These measurements reflect the current building lines and the full extent of the footway, as shown in the table below and on table 4.6 from the transport assessment.

Location	Existing Width	PCL Width	AM Peak Flow	AM Peak Crowding	AM Peak PCL	Lunchtime Peak Flow	Lunchtime Peak Crowding	Lunchtime Peak PCL	PM Peak Flow	PM Peak Crowding	PM Peak PCL
1a	1.9	1.5	256	2.8	A+	379	4.2	A	215	2.4	A+
1b	1.6	1.2	256	3.6	F	379	5.3	F	215	3	F
1c	1.4	1	256	4.3	F	379	6.3	F	215	3.6	F
2a	2.2	1.8	1052	9.7	B+	1066	9.9	B+	1092	10.1	B+
2b	2.5	2.1	1052	8.3	A-	1066	8.5	A-	1092	8.7	A-
3a	6.9	6.1	830	2.3	A+	822	2.2	A+	741	2	A+

Figure 4-6: 2024 Base Pedestrian Flows Diagram



594. In the existing scenario (as shown above), all footways, except for the pinch point on the eastern side of Cullum Street (sections 1b and 1c), achieve a Pedestrian Comfort Level (PCL) of C+ or higher. However, Cullum Street (1b, 1c) consistently records a PCL of F across all time periods due to congestion caused by the pinch point. Fenchurch Street (sections 2a and 2b) maintains a PCL of B+ to A-, indicating moderate pedestrian volumes. Meanwhile, Fen Court (4a) achieves a PCL of A+ throughout the day, reflecting a high level of pedestrian comfort.

595. In the proposed (2040 baseline) scenario, all footways—except the eastern side of Cullum Street (1b, 1c)—achieve a Pedestrian Comfort Level (PCL) of C+ or higher. Cullum Street continues to experience a PCL of F due to congestion at a pinch point. Fenchurch Street (2a, 2b) sees increased pedestrian flows but maintains a PCL of B+, while Fen Court (3a) consistently achieves A+. Overall, pedestrian flows rise across all locations compared to 2024, but comfort levels remain stable, with Cullum Street being the only area with poor performance. See below extract diagrams of the transport assessments.

Figure 4-8: Future Footway Widths

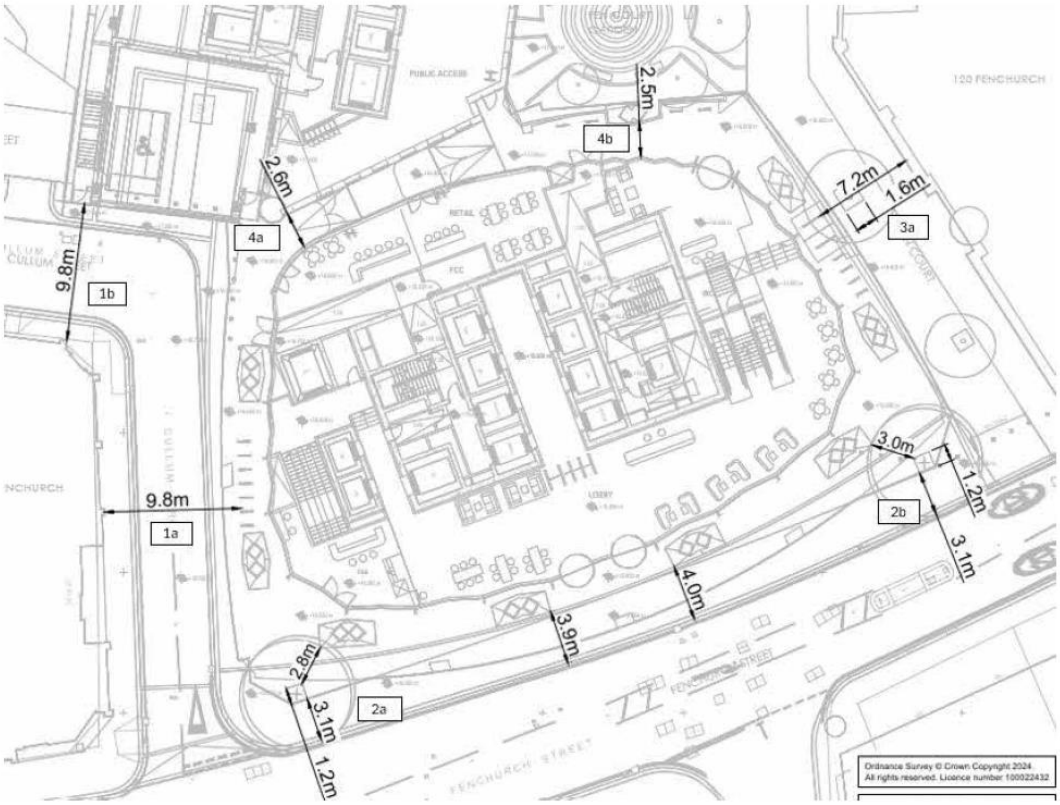
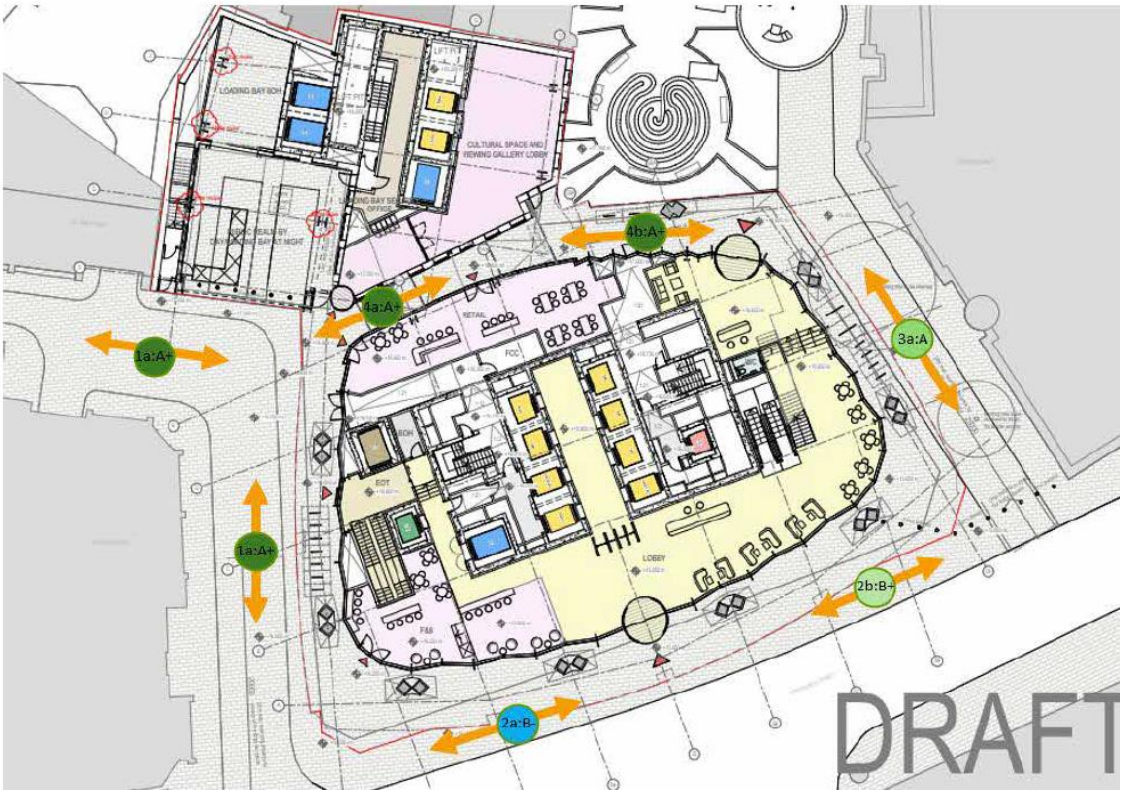


Figure 4-9: 2040 Base Pedestrian Flows Diagram



596. The proposed development would transform Cullum Street into a raised shared space designed to accommodate all road users, enhancing both accessibility and the pedestrian experience. It would also create a pedestrian-only link between Cullum Street and Fen Court, along with improvements to Fenchurch Street. The footways fronting the site would benefit from increased width, incorporating both public highway and private areas. Figure 4-8 illustrates the proposed future footway widths.

597. These improvements would be delivered as part of a Section 278/38 Agreements and are designed to mitigate pedestrian impacts while significantly enhancing walking conditions in the surrounding area. They also support broader transport sustainability objectives by improving the quality of the pedestrian environment around the site.

598. Below are the proposed PCLs (extract of the transport assessment) following the highway improvement works.

Table 4-5: Future Base 2040 with Development – PCL Footway Assessment

PCL PARAMETERS			AM PEAK			LUNCHTIME PEAK			PM PEAK		
Location	Existing Width	PCL width	PCL Flow	Crowding	PCL	PCL Flow	Crowding	PCL	PCL Flow	Crowding	PCL
1a	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
1b	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
1c	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
2a	3.1	2.7	2452	15.1	B-	1780	11.0	B+	2310	14.3	B-
2b	3.1	2.7	1561	9.6	B+	1366	8.4	A-	1548	9.6	B+
3a	5.6	4.8	1258	4.4	A	1069	3.7	A	1111	3.9	A
4a	2.6	2.2	245	1.9	A+	178	1.3	A+	231	1.8	A+
4b	2.5	2.1	245	1.9	A+	178	1.4	A+	231	1.8	A+

Table 4-6: Base 2024 vs Future Base 2040 with Development – Comparison

BASE 2024				FUTURE BASE 2040			
1a	A+	A	A+	1a	A+	A+	A+
1b	F	F	F	1b	A+	A+	A+
1c	F	F	F	1c	A+	A+	A+
2a	B+	B+	B+	2a	B-	B+	B-
2b	A-	A-	A-	2b	B+	A-	B+
3a	A+	A+	A+	3a	A	A	A
N/a	.	.	.	4a	A+	A+	A+
N/a	.	.	.	4b	A+	A+	A+

599. The proposals are considered acceptable as they align with the current transport strategy objectives by supporting the creation of a high-quality public realm that is inclusive, accessible, and enhances the experience of walking, cycling, and wheeling. Complementing this, Policy CS16 focuses on improving public transport, streets, and walkways by enhancing the public realm to support pedestrian movement and safety, including the development of new pedestrian routes.

Trip Generation – Servicing and Delivery

600. Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure would be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions. Refuse and recycling vehicle trips to be made outside of peak hours: 7:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00. Depending on the proposals evening servicing can be considered.

601. The existing site comprises an office development of approximately 13,957 sqm (GIA) with ancillary retail accommodation at ground floor level. The existing site has a basement car park with 20 spaces and basement servicing facilities, with access taken from Cullum Street.

602. The Proposed Development would demolish all existing buildings and structures to redevelop the site and provide a total floor area of 69,553sqm GIA, comprising 57,491sqm office floor space.

603. The CoL Loading Bay Ready Reckoner tool has been used to estimate the daily number of servicing vehicles that the Proposed Development may generate, and in the absence of survey data for the existing site, the same tool has also been applied to assess the current office development.

604. Servicing rates based on CoL parameters: 0.22 trips per 100 sqm per day for office use and 1.35 trips per 100 sqm per day for retail use have been applied to the Proposed Development's floorspace, with elevated public spaces assessed using retail rates.

605. This development includes an initial proposal for 50% consolidation, capped at 99 vehicles per day (net change of 68 one-way trips). The aim is to reduce deliveries by 75%, with a future target of 90% consolidation, as achieved in similar City of London schemes.

606. This strategy involves combining multiple deliveries and collections into fewer, larger movements to enhance efficiency and reduce environmental impact, contrasting with the current unconsolidated delivery approach at the site.

607. The current servicing strategy allows unrestricted vehicle access via Cullum Street to a basement car park and servicing area, with deliveries occurring throughout the day and no consolidation measures in place.

608. The proposed strategy introduces off-site freight consolidation in line with City of London (CoL) policy, aiming to reduce delivery volumes by 75%, with a future target of 90%, as achieved in similar schemes.

609. All deliveries, except those made by cargo bikes, would be restricted to overnight hours (11 pm–7 am) to minimise conflicts with pedestrians and cyclists. Deliveries and servicing would be pre-booked, and personal deliveries would not be permitted. During the day, the area would be served by a Blue Badge bay, managed by a facilities management company. The bay's management details would be secured through the Section 106 Agreement.

610. During the day, cargo bikes can use the servicing yard as seen in the below image and extracted from the transport assessment. Vehicle access would be limited to an 8m rigid lorry, which must reverse into the site, while smaller vehicles like Transit Vans can manoeuvre in forward gear.

Figure 5-1: Proposed Servicing Arrangement



611. The proposed development would include two dedicated loading bays within the service yard, designed to meet servicing needs while allowing safe vehicle manoeuvring and forward egress onto Cullum Street, as confirmed by swept path analysis. A Road Safety Audit of both the Cullum Street improvements and servicing strategy raised no safety concerns.

612. If planning permission is granted, a Delivery and Servicing Management Plan (DSMP) would be secured through the Section 106 Agreement and monitored for five years. To avoid conflicts with delivery and servicing activities and to comply with the permitted hours of use, it is recommended that refuse and recycling collections be integrated into the same system that manages delivery and servicing slots.

613. The allocated slots for refuse and recycling can be reviewed periodically to suit different parts of the development, but any changes must be agreed upon in advance by all parties occupying the site. This approach ensures that the loading and parking area is managed within designated times and accommodates varying operational needs. Further details regarding refuse and recycling arrangements, such as identifying collection points without interfering with other

building activities, would be secured as part of the DSMP via a Section 106 obligation.

614. These proposals comply with the City of London Local Plan 2015, specifically Core Strategic Policy CS16 and Development Management Policies DM16.5 and DM16.6, which promote sustainable, coordinated, and conflict-free servicing strategies.

Cycle Parking

615. The existing site currently lacks any dedicated cycle parking, including both long and short stay spaces.

616. The Proposed Development would deliver a total of 860 long stay and 48 short stay cycle parking spaces.

617. The long stay provision, located at basement level 1, includes a mix of 43 accessible spaces (5%), 43 Sheffield stands (5%), 648 two-tier racks (75%), 39 vertical racks (5%), and 88 active travel lockers (10%). This provision exceeds the 19% mode share requirement, ensuring compliance with current policy.

618. To further support active travel, high-quality end-of-trip facilities would be provided, including lockers, showers, and changing rooms, with a ratio of one shower/changing room per 12 cycle spaces.

619. The layout of the cycle parking at basement mezzanine 01 and the end-of-trip facilities at basement level 1 are illustrated in Figures 3-16 and 3-17 below (extract from the transport assessment), respectively.

620. In accordance with the London Plan, a total of 48 short-stay cycle parking spaces are required. The proposal includes 30 short-stay spaces (provided via 15 Sheffield stands) and four accessible spaces (via two enlarged Sheffield stands) within the site boundary. Additionally, 18 active travel lockers for visitors would be installed adjacent to the public area accessed from Cullum Street. This is shown in Figure 3.18, circled in red. The racks are located within private areas and not on the public highway.

Figure 3-16: Basement Mezzanine- 1 Cycle Parking

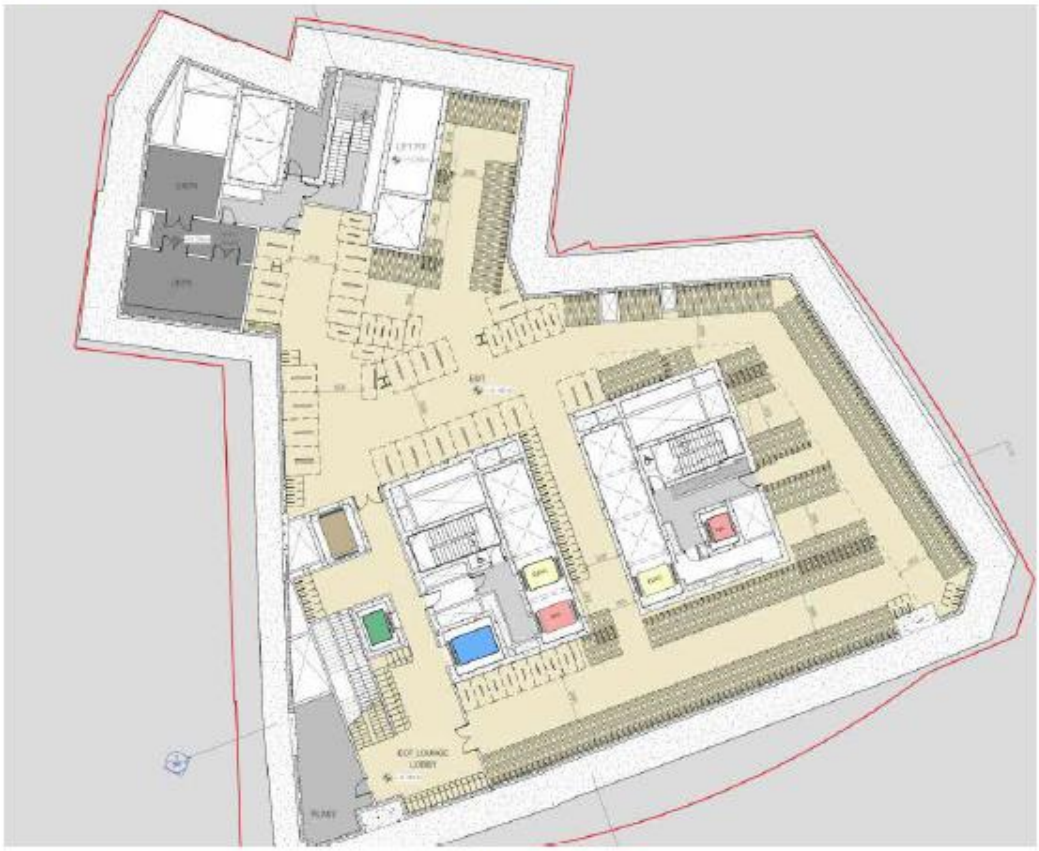
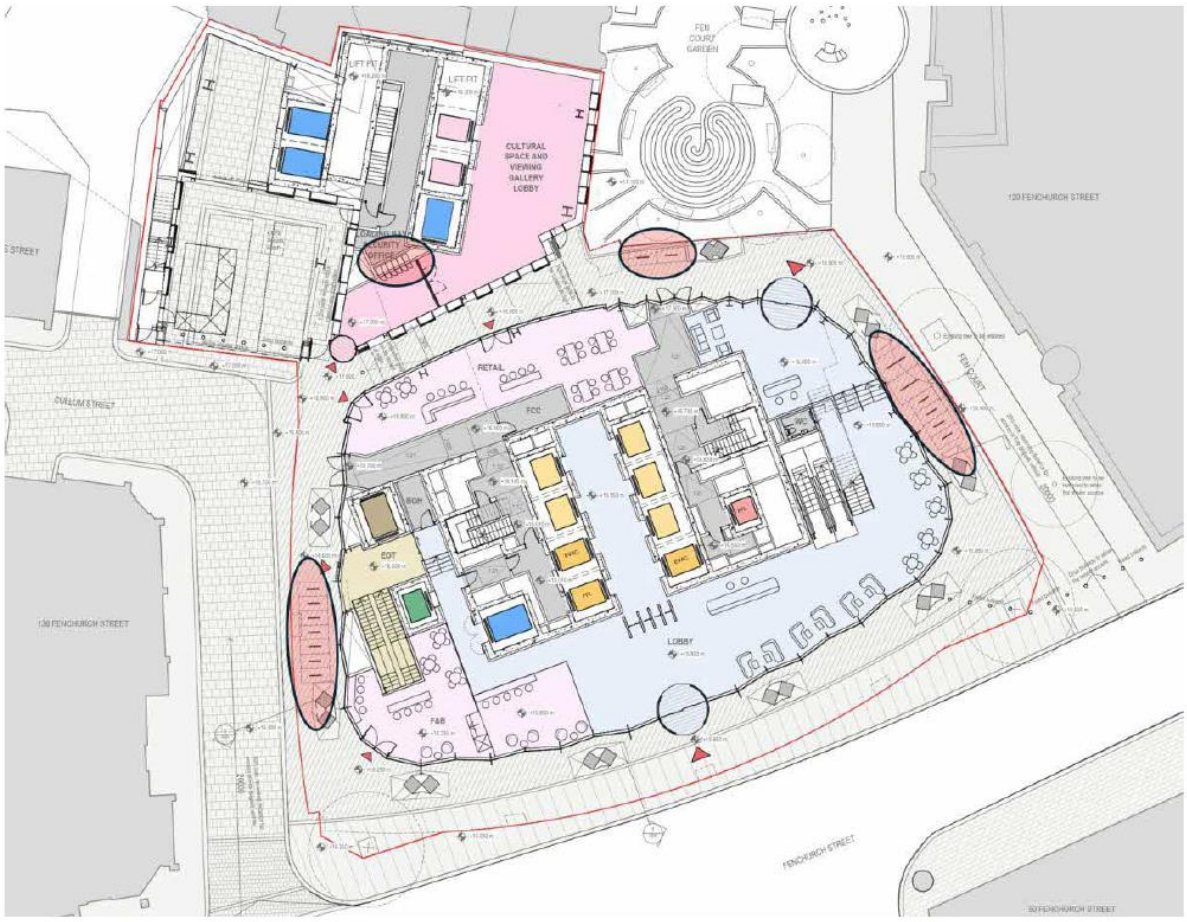


Figure 3-17: Basement 01 - End-of-Trip Facilities



Figure 3-18: Short-Stay Cycle Parking



Car Parking (Blue Badge)

621. The basement car park and servicing yard, accessed via Cullum Street, provides 20 car parking spaces. The entire City of London is designated as a Controlled Parking Zone (CPZ), with restrictions in place from Monday to Friday between 07:00 and 19:00, and on Saturdays from 07:00 to 11:00; no restrictions apply on Sundays. Along Fenchurch Street, double yellow lines prohibit parking, and intermittent single and double yellow kerb markings further restrict stopping and loading. Disabled parking bays are available on Mincing Lane, approximately 150 metres south of the site, and on London Street, around 200 metres to the east. These bays permit parking for up to four hours on weekdays, with no time limits on weekends, as shown in figure below.

Figure 3-20: Proposed Blue Badge Bay



622. The Proposed Development would be car-free except for one accessible parking bay located within the servicing yard accessed via Cullum Street, in accordance with the requirements of the London Plan.

623. The accessible parking space would be available for use between the hours of 07:00 to 23:00 when servicing is not taking place and would be privately managed, being available for building users only.

624. Based on the above, the current approach to car parking is supported and based on encouraging sustainable travel choices and improving access for those with mobility needs. This is in accordance with Policy VT3 of the Draft City Plan 2040.

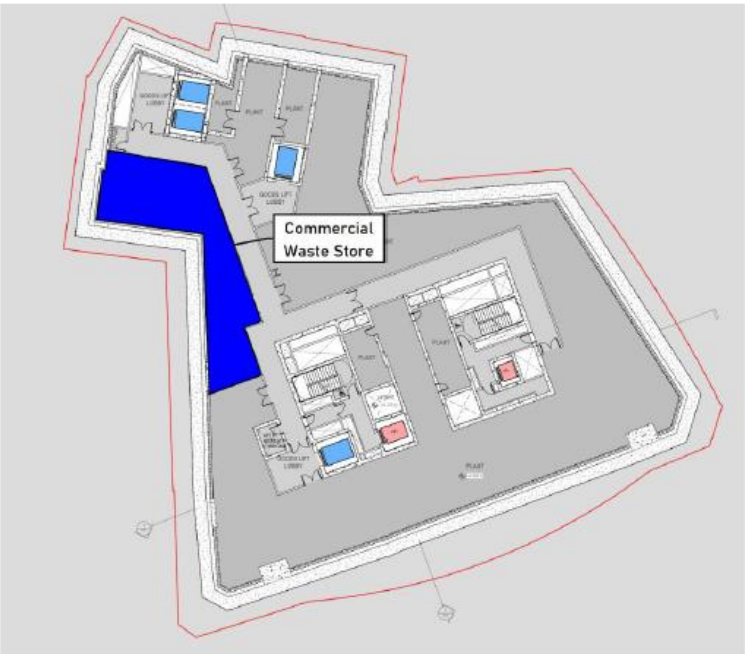
The Refuse Management/Waste Strategy

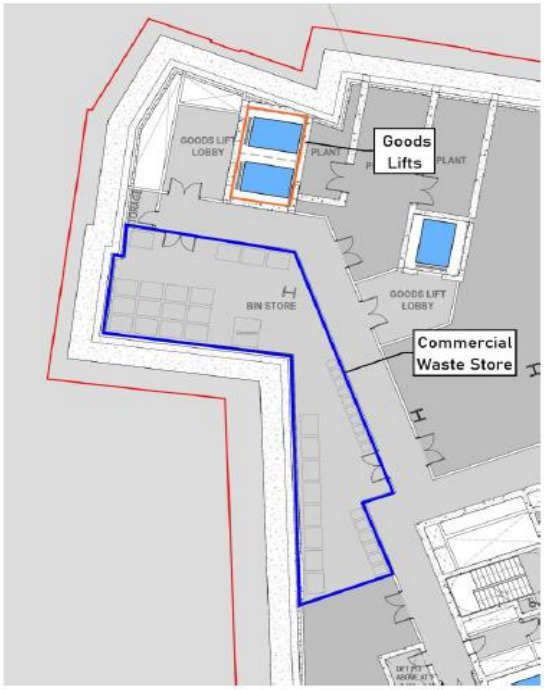
625. The waste storage area for the proposed development would be located in the basement and brought up to ground floor level for collection during overnight servicing hours (23:00–07:00), in accordance with the servicing strategy. Waste collection would be managed through the Operational Waste Management Strategy (OWMS) submitted as part of the planning application. Waste collection vehicles would access the dedicated service yard via Cullum Street.

626. The proposed commercial waste management strategy aims to deliver a high-quality service to tenants while complying with relevant guidance. All waste

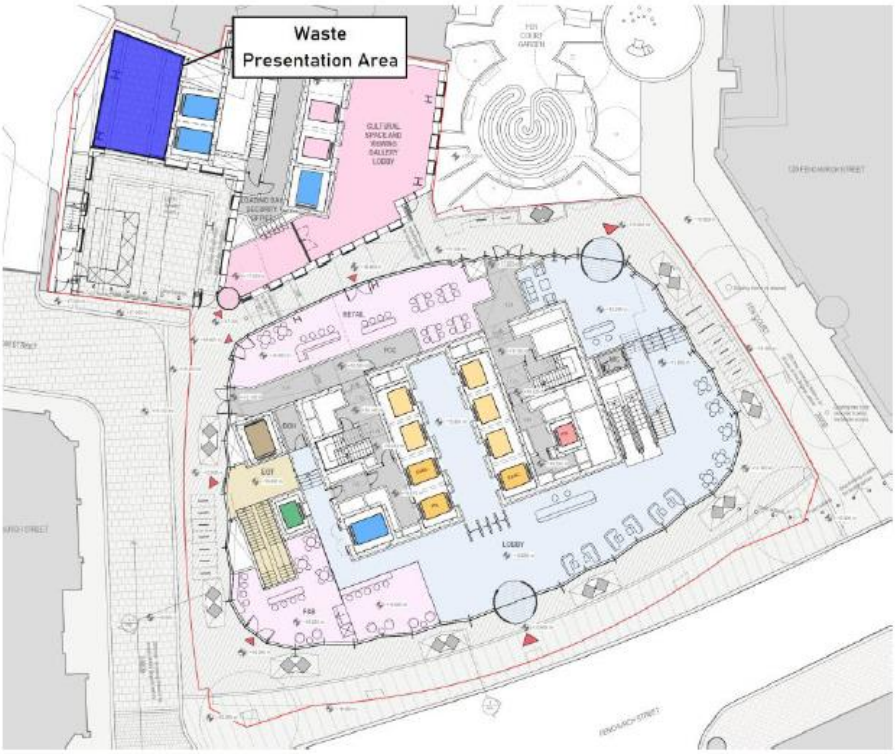
storage and presentation facilities would be designed in accordance with British Standard BS5906:2005, incorporating features such as a nearby water point for wash-down, sealed and easy-to-clean surfaces, a suitable floor drain, and adequate lighting and ventilation. Commercial tenants would maintain temporary internal waste storage areas to enable segregation at source.

627. In office areas, an on-site Facilities Management (FM) contractor would collect segregated waste using appropriate trolleys and transport it via service lifts and corridors to the commercial waste store at Basement Level 01. Retail tenants would transfer their segregated waste to the same store outside of peak hours. A dedicated commercial waste store is located at Basement Level 02, where all residual waste, dry mixed recyclables (DMR), food waste, and glass waste generated within the development would be stored prior to collection. The location of this store and its configuration is illustrated in the figure below. The proposals have been agreed upon with the City of London.





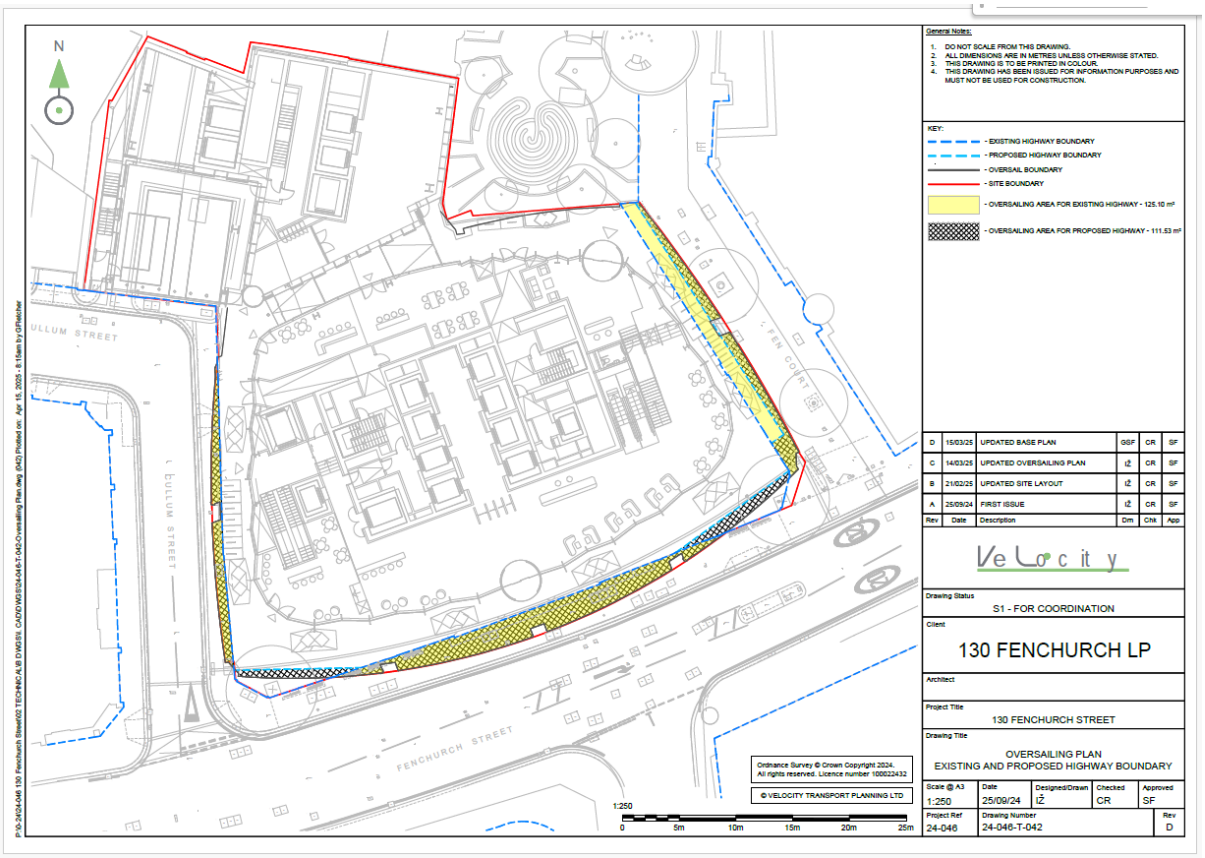
628. The Proposed Development would have separate waste streams collected multiple times weekly by a licensed contractor. The on-site facilities management (FM) team would use service lifts to move bins from the basement to a designated ground-level presentation area near the loading bays. Two goods lifts ensure reliability during maintenance or breakdowns. Waste would be presented in timed windows within approved servicing hours, without placing bins on public highways. Collection vehicles, no longer than 8 metres, would access the site via Cullum Street. The route for moving bins would comply with BS5906:2005 standards. After collection, bins would be returned to the basement by the FM team.



Oversailing/Undersailing

629. Structures that permanently oversail the public highway must be licensed by the local authority, typically in accordance with Sections 177 and 179 of the Highways Act 1980.

630. This development proposes both oversailing and undersailing, which are subject to the licences mentioned above, as referenced in Drawing No. 24-046-T-042.



Highway Boundary - Stopping Up and Adoption

631. As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders. The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent.

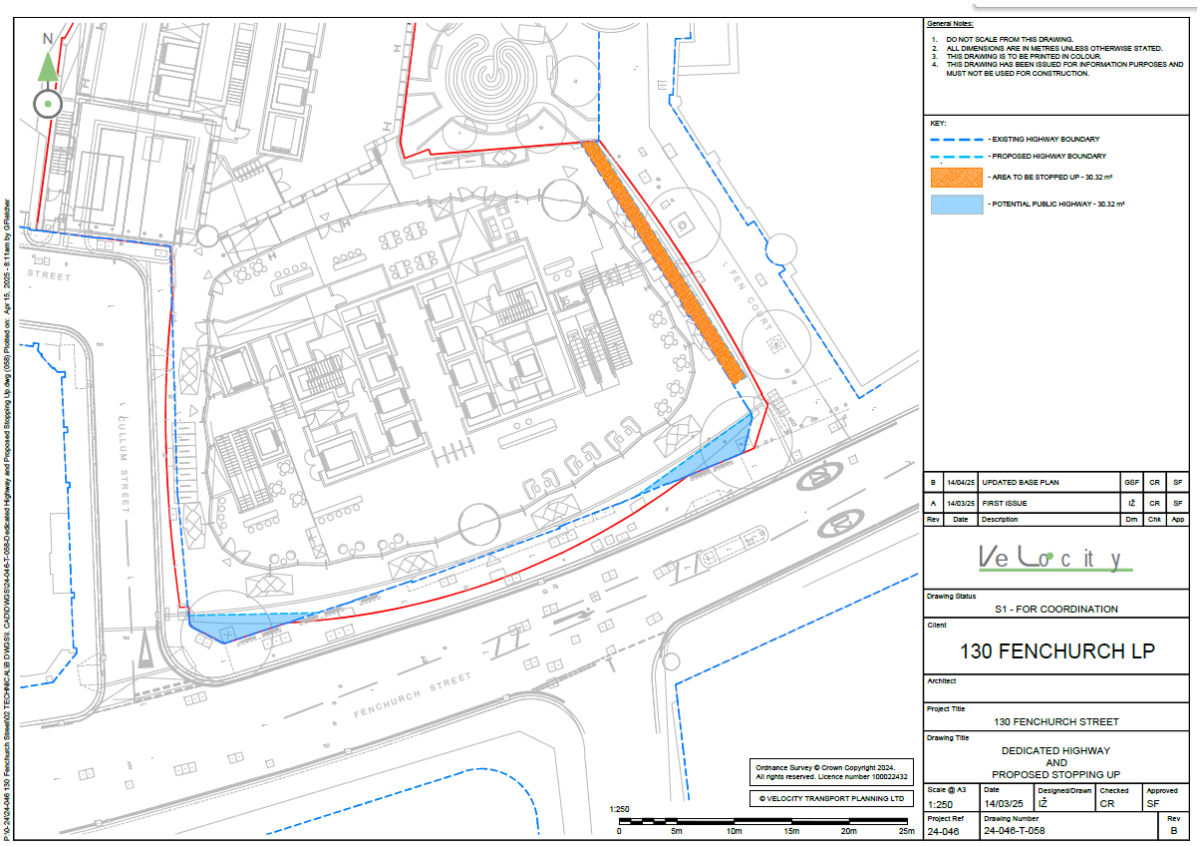
632. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so to enable development to be carried out. That process would be carried out under separate procedures from the considerations of the applications currently before you.

633. Areas of privately owned land can alternatively be ‘offered up’ for adoption as public highway, for instance, for the creation of a new ‘estate road’ to be adopted and maintained by the local authority.

634. The submitted application includes proposals (Dwg No. 24-046-T-058) to stop up a section of the public highway located within the site boundary. The area in question encompasses the footprint of structural columns that would be positioned within the public highway and has been extended to establish a more coherent and rationalised highway boundary along Fen Court.

635. To compensate for the loss of public highway, two areas along Fenchurch Street are proposed for adoption, ensuring that the total area dedicated to public highway remains equivalent to the land being stopped up. In addition, the proposals would deliver a significant increase in permissive path, enhancing pedestrian connectivity and contributing to wider public realm improvements.

636. The area proposed to be stopped up on Fen Court measures 30.32 sqm, with an equivalent area to be re-dedicated as public highway. Furthermore, 315.95 sqm would be provided as permissive path—privately owned land that would remain accessible to the public.



Highways Works - Section 278/38 Agreements

637. The proposed public realm enhancements surrounding the site aim to improve pedestrian experience and connectivity through widened footpaths, the

introduction of two new street trees along Fenchurch Street, and the provision of short-stay cycle parking.

638. The building line along Fenchurch Street would be set back to create a broader public realm, including a new permissive path. A new pedestrian route is proposed between Cullum Street and Fen Court, offering a more direct connection and easing foot traffic on Fenchurch Street; this route would be closed overnight between 23:00 and 07:00.

639. Cullum Street would feature a shared surface treatment to prioritise pedestrians during the day while accommodating servicing needs at night. The service yard would serve as a multifunctional space, supporting accessible parking, managed by the facilities team under an Accessible Parking Management Plan, and overnight servicing.

640. These improvements are expected to enhance pedestrian comfort along both Cullum Street and Fenchurch Street. The development aligns with Healthy Streets principles by offering shade and shelter, places to rest, and engaging public features, ultimately delivering a significant upgrade for current and future non-motorised users.

641. As part of the City's Transport Strategy Delivery Plan for 2025/26 to 2030/31, a Healthy Streets Plan is currently being developed for the area surrounding Fenchurch Street Station. This plan includes proposed upgrades and extends south to the River Thames, encompassing Eastcheap and the Monument junction.

642. It would provide a framework for public realm enhancements and traffic management to support the wider Transport Strategy. These initiatives form part of a rolling programme of small-scale interventions at targeted locations across the City. Over the course of a three-year period, raised carriageways would be introduced on side streets in this area to reduce road danger, improve accessibility, and enhance the walking and cycling experience. Additional schemes would be developed as the programme progresses.

643. This development would contribute towards the vision above, via a Section 278 scheme for highway improvement works related to this development, providing an accessible area for walking, cycling, and wheeling.

644. The scope of the Section 278 works would include (but are not limited to):

645. *Fenchurch Street*

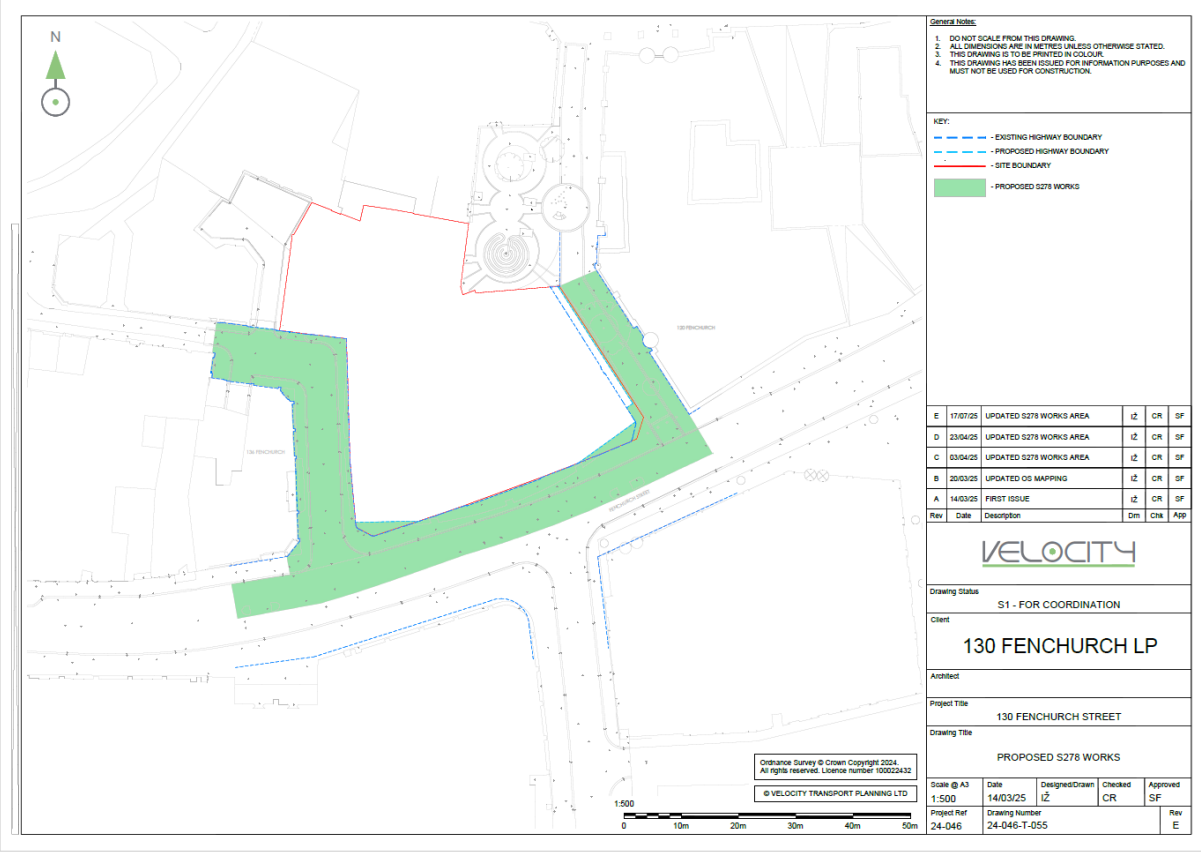
- Reconstruction of the footways fronting the site
- Resurfacing of the carriageway
- Reinstatement of pedestrian island following construction, subject to detailed design and pedestrians desire line.
- Reinstatement of road markings

646. *Cullum Street*

- Reconstruction of the footways fronting the site to accommodate new site layout
- Provision of raised carriageway
- Highways Drainage
- Reinstatement of road markings and associated traffic orders

647. *Fen Court*

- Reinstatement of paved areas and associated works



Construction Logistics Plan

648. The proposal involves a significant amount of demolition and construction work, which would generate a large number of construction vehicle movements during the overall construction period. These proposed works could significantly impact the operation of the public highway in the local area if not managed effectively. The primary concern is public safety, but it is also essential to ensure that construction traffic does not unreasonably create or add to existing traffic congestion, or impact the road safety or amenity of other highway users.

649. The proposal (see figure below) is also likely to lead to various amenity issues for local businesses that need to be carefully managed (e.g., noise, vibration, air quality).

650. To mitigate the above, an outline Construction Logistic Plan (CLP) has been submitted in support of the planning application.

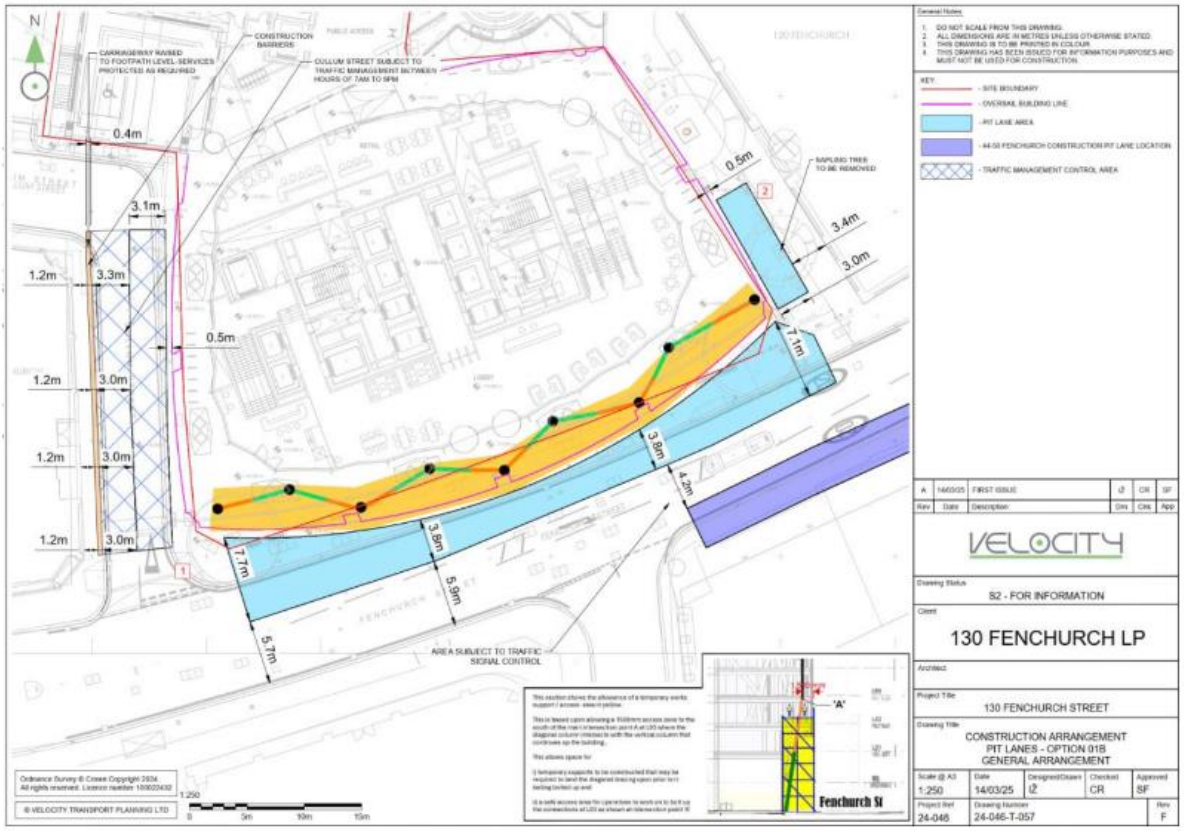
651. This plan provides information describing the proposed works and how, at this preliminary stage, they could be undertaken. It also details how the impacts associated with the construction period would be mitigated and highlights concerns of local stakeholders early on to ensure these are accounted for within the detailed Construction Logistics Plan. This requirement should be secured by condition and prepared once a Principal Contractor has been appointed.

652. This document would need to align with Transport for London's Construction Logistics Plan Guidance and would be subject to City of London approval before demolition and construction can commence. The detailed Construction Logistics Plan should highlight, among other things, how public liaison and coordination with other nearby construction sites would be managed. The appointed contractor would be required to join the construction cluster groups, which are groups formed by nearby construction sites holding regular meetings with the attendance of the City of London's highways officers to ensure coordination.

653. Commencement of works would be subject to appropriate legislation under the London Permitting Scheme, which falls under the Traffic Management Act 2004. The construction works of the development would need to be coordinated with the nearby sites. Proposed construction proposals may have to be reviewed for coordination.

654. If planning permission is granted, the submission of a detailed CLP should be secured separately via condition to ensure the construction and demolition of the site comply with The London Plan Policy T7 and DM16.1 of the City of London Local Plan 2015 and with the emerging City Plan 2040. This would provide a

mechanism to manage and mitigate the impacts the proposed development would have on the local area. The detailed CLP would need to be approved by the City of London prior to the commencement of works on site, should planning permission be granted.



Highways and Transportation Conclusion

655. The scheme benefits from high levels of public transport accessibility, would be car-free and it promotes cycling and walking as sustainable modes of transport. The proposals are considered acceptable in transport terms, subject to conditions and S106 obligations.

656. Should planning permission be granted the following conditions (as a minimum) along with the Section 278 and Section 38 of the Highways Act 1980 to be secured:

- A planning condition requiring the provision of 860 long stay cycle parking spaces, 48 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which would need to be submitted and approved, and approval should be reserved by condition.

- A planning condition to secure the detailed Construction Logistics Plan (CLP). The condition shall state that the detailed CLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the CLP has been approved by the planning authority.
- A S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.
- A S106 obligation to secure an Accessible Car Park Management Plan (ACPMP) including details of how the accessible parking spaces would be managed to accommodate the users and their requirements.
- A S106 obligation to secure a Travel Plan (TP) for the development. The obligation shall state that the TP shall be approved prior to the first occupation of the site and the approved travel plan shall be followed for 5 years, unless otherwise agreed with the Highway Authority.

657. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction.

658. It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

Environmental Impact of Proposals on Surrounding Area

659. Local Plan policy DM10.1 requires the design of development, and materials used to ensure that unacceptable wind impacts at street level and in the public realm are avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

<u>Wind Microclimate</u>

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

661. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, buildings entrances, bus stops, ground and terrace level amenity spaces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

662. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, of if there is negligible or beneficial effect, wind mitigation is not required.

663. The study area includes all buildings or structures within 450m of the centre of the site. Assessments have been carried out for both the windiest season and the summer season. A series of cumulative configurations have been run, which separates out all consented developments (referred to as "consented cumulative surrounding buildings"), and those which have been submitted but not yet granted planning permission (referred to as "non consented cumulative surrounding buildings"). There are eight configurations that have been tested:

- Configuration 1: Existing Site with existing surrounding buildings;
- Configuration 2: Existing Site with consented cumulative surrounding buildings;
- Configuration 3: Proposed Development with existing surrounding buildings;

- Configuration 4: Proposed Development with existing surrounding buildings, existing and proposed landscaping, and mitigation measures;
- Configuration 5: Proposed Development with consented cumulative surrounding buildings;
- Configuration 6: Proposed Development with consented and non-consented cumulative surrounding buildings;
- Configuration 7: Proposed Development with consented cumulative surrounding buildings, existing and proposed landscaping, and mitigation measures; and
- Configuration 8: Proposed Development with consented and non-consented cumulative surrounding buildings, existing and proposed landscaping, and mitigation measures

664. The consented cumulative schemes identified within the 450m radius of the site are assessed in Configurations 2, 5-8 are listed below
    - 47 – 50 Mark Lane (Planning Reference: 22/01245/FULMAJ);
    - 55 Bishopsgate (Planning Reference: 22/00981/FULEIA);
    - 99 Bishopsgate (Planning Reference: 24/00836/FULEIA);
    - 60 Gracechurch (Planning Reference: 24/00743/FULEIA)
    - 70 Gracechurch (Planning Reference: 24/00825/FULEIA;
    - 85 Gracechurch (Planning Reference: 22/01155/FULEIA;
    - 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA);
    - Boundary House (Planning Reference: 21/00826/FULMAJ);
    - 150-152 Fenchurch Street (Planning Reference: 23/01016/FULL); and
    - 1 Undershaft (Planning Reference: 23/01423/FULEIA).

665. The non-consented cumulative schemes identified within the 450m radius of the Site are assessed in Configurations 6 and 8 are listed below:
    - Bevis Marks House (Planning Reference: 24/00976/NMA);
    - Bury House (Planning Reference: 24/0021/FULEIA);
    - 30-33 Minories (Planning Reference: 23/00365/FULMAJ);
    - New London House (Planning Reference: 25/00329/FULMAJ);
    - 63 St Mary Axe (Planning Reference: 25/00223/FULEIA); an
    - 1-2 Minster Court (Planning Reference: 24/00886/SCOP).

666. Officers note that one “future baseline” building at 50 Fenchurch Street is present in all configurations as agreed as part of the EIA Scoping process, as this building is currently under construction and within close proximity.

667. As the proposed buildings are over 50m AOD, both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing have been undertaken by independent experts. The wind tunnel and CFD results broadly give the same assessment results. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable

668. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features. The assessment was graded against the Lawson Comfort and Safety Criteria, as shown in the below table. Comfort categories are based on the level of wind speed exceedance for 5% of each season, and safety categories are based on the level of wind speed exceedance for 1.9 hours per year.

Table 01: Lawson Comfort Criteria (City of London variant)

KEY	COMFORT CATEGORY	MEAN WIND SPEED (5% EXCEEDANCE)	DESCRIPTION
	Frequent Sitting	2.5 m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
	Occasional Sitting	4 m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies/terraces intended for occasional use, etc.
	Standing	6 m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
	Walking	8 m/s	Acceptable for external pavements, walkways.
	Uncomfortable	>8 m/s	Not comfortable for regular pedestrian access

669. The City of London Lawson criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.

670. Officers note that during the planning process a revised Wind Microclimate addendum to the Environmental Statement has been received. The main amendment within the documentation specifically relates to the Pedestrian Level Wind Microclimate Assessment now including the wind mitigation measures that form part of the 50 Fenchurch Street development (planning reference 25/00641/MDC). The measures provided under that separate application would

provide further design details in terms of a soft and hard landscaping for wind mitigation at the 10th floor terrace of 50 Fenchurch Street, which was assessed as a future receptor as a publicly accessible roof terrace in the April 2025 ES and therefore requires re-assessment. No changes to the proposed development (such as design, operation, embedded mitigation or alternatives) or the EIA (such as scope or methodology) have occurred since the April 2025 planning application was submitted.

Configuration 1: Existing Site with existing surrounding buildings

671. In this scenario, all the existing surrounding buildings which are built and also other buildings which are constructed above the basement level are considered.

Pedestrian Comfort

672. The existing Site has predominantly occasional sitting and standing use wind conditions during the windiest season, with localised areas of walking and uncomfortable condition to the west of site along Fenchurch Street. During the summer season, wind conditions are generally calmer at ground level, suitable for frequent “occasional sitting”, “standing”, with isolated “walking” use conditions at the existing Site and the surrounding area

673. The off-site elevated terraces have wind conditions with a mix of occasional sitting and standing use conditions with isolated walking and uncomfortable conditions on 30-35 Fenchurch during the summer season.

Strong Winds

674. Within the existing baseline there are instances of strong winds exceeding the safety threshold at ground level on Fenchurch Street to the west and an isolated safety exceedance at off-site elevated terraces on 30-35 Fenchurch. Officers note that the instance of strong winds on Fenchurch Street in particular is an established wind safety issue that is mainly caused by the structure at 20 Fenchurch Street.

Configuration 2: Existing Site with the cumulative surrounding buildings

675. The assessment of future baseline conditions including the existing site with consented cumulative surrounding buildings.

Pedestrian Comfort

676. Overall, the wind conditions around the existing site in the context of cumulative surrounds would be calmer than that in Configuration 1. Wind condition ranges

from frequent sitting to walking use condition during the windiest season. As the City Cluster densifies there are noticeable improvements to the conditions surrounding the site.

677. The off-site elevated terraces have wind conditions with a mix of occasional sitting and standing use conditions with isolated walking and uncomfortable conditions on 30-35 Fenchurch during the summer season.

Strong Winds

678. There is one off-site area with instances of strong winds exceeding the safety threshold on the elevated terraces on 30-35 Fenchurch.

Demolition and Construction Effects

679. The likely effects of nearby receptors from wind during demolition and construction have been assessed. Demolition and construction activities are less sensitive to wind conditions (given their protection from site hoardings, and site access being restricted to site workers) than the completed development with full public access. There would be variety in the effects during demolition and construction given the phased nature of such works, and all effects would be temporary.

Configuration 3: The Proposed Development with existing surrounding buildings

680. The assessment of the proposed development within the surrounds of the existing buildings.

Pedestrian Comfort

681. During the windiest season, wind conditions on-site and in the nearby surrounding area would be a mixture of occasional sitting and walking use, with localised uncomfortable use wind conditions at the roadway along Fenchurch Street. Summer wind conditions would generally be calmer.

682. The majority of probe locations (i.e. the positions used for the measurements) show that the proposal in this configuration would represent either a negligible or moderate beneficial effect in comparison to Configuration 1 (the “baseline”). There are areas where locations would become windier than on the baseline and these are explored below.

683. In terms of moderately adverse impacts these would be localised at:

- Off-site thoroughfares along Fen Court, the eastern element of Fenchurch Street (adjacent 40 Leadenhall Street) and immediately to the southwest of the proposed building.
- On-site entrances mainly on the corner of Fenchurch Street and Cullum Street (significant effect – i.e. requires mitigation).
- The off-site bus stop opposite.
- Two areas of seating and a further central location within Fen Court Garden (significant effect).
- On-site roof level mixed use amenity with standing and walking use wind conditions at the level 20 public terrace (significant)
- On-site roof level mixed use amenity with standing and walking use wind conditions on the Level 22 and 30 office terraces (significant)
- Off site roadways along Fenchurch Street and Cullum Street.

684. There would be a further major adverse effect at:
- An off-site entrance at the corner of Fenchurch Street and Mincing Lane

685. Given the above 'significant' moderately adverse impacts and major adverse impacts wind mitigation measures would be required to ensure conditions are suitable for the intended use.

Strong Winds

686. There would be no on-site areas with instances of strong winds exceeding the safety threshold.

687. There would however be two off-site instances of strong winds exceeding the safety threshold although these instances would in fact represent a betterment over the existing scenario. Located on Fenchurch Street and on the 8th level terrace on 30-35 Fenchurch, these instances of strong winds existing within the baseline configuration and therefore not bought about as part of the proposal.

<u>Configuration 4: Proposed Development with existing surrounding buildings, existing and proposed landscaping, and mitigation measures</u>

688. As per the adopted guidelines, given the above 'significant' moderately adverse impacts and major adverse impacts wind mitigation measures would be required to ensure conditions are suitable for the intended use. Configuration 4 essentially represents Configuration 3 but with added mitigation measures and landscaping.

689. The mitigation/landscaping measures proposed are as follows:

- Off-site 2m tall × 1m wide screens on the southwestern elevation entrance (near probe location 111 and 112);
- relocation of the passageway entrance to a calmer location adjacent (from probe location 112 to 28);
- increase in the height of the balustrade at the office terraces at probe locations 162 and 163 to solid 0.5m on top;
- two additional shrub planters each of 1.5m at the office terraces at probe locations 162 and 163; and,
- additional 3m tall evergreen tree at the roof terrace amenity near probe location 167 on the existing planter bed.
- incorporated all the embedded mitigation landscaping on the elevated level 10 public terrace on 50 Fenchurch Street and engage with the developer as necessary.

Pedestrian Comfort

690. During the windiest season, wind conditions on-site and in the nearby surrounding area are a mixture of frequent sitting to walking use condition. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds frequency associated with this period of the year, with a larger extent of areas with sitting use wind conditions

691. The majority of probe locations show that the proposal in this configuration would represent either a negligible or moderate beneficial effect in comparison to Configuration 1 (the “baseline”) and the above Configuration 3. There are areas where locations would become windier than on the baseline and these are explored below.

692. In terms of moderately adverse impacts these would be localised at:
- Off-site thoroughfares along Fen Court, the eastern element of Fenchurch Street (adjacent 40 Leadenhall Street) and immediately to the southwest of the proposed building (but would be suitable for the intended use).
- Off-site entrances mainly on the western side of Fenchurch Street and Cullum Street (but would be suitable for the intended use).
- The off-site bus stop opposite (but would be suitable for the intended use).
- One areas of seating and a further central location within Fen Court Garden (but would be suitable for the intended use).
- On-site roof level mixed use amenity with standing and walking use wind conditions at the level 20 public terrace (significant)
- On-site roof level mixed use amenity with standing and walking use wind conditions on the Level 22 and 30 office terraces (significant)

- Off site roadways along Fenchurch Street and Cullum Street (but would be suitable for the intended use).

693. The results for configuration 4 would be similar to configuration 3, with some additional beneficial effects in particular the established safety exceedance along Fenchurch Street. The majority of the proposed moderately adverse effects detailed above represent the shifting from one wind category to another, however most of these would remain suitable for the intended use.

694. Further wind effects would be felt at both the proposed public terrace and one office terrace. It should be noted that, standing use condition with the public terrace would exceed the required occasional sitting marginally. Therefore, on balance, the occupants would not likely perceive the difference in the comfort conditions drastically. Officers also note there is no requirement for office terraces with unsuitable wind conditions to be mitigated.

Strong Winds

695. There would be no on-site areas with instances of strong winds exceeding the safety threshold.

696. Instances of strong winds exceeding the safety threshold in the baseline scenario but are made better as a result of the proposed development on the western 8th level terrace on 30-35 Fenchurch.

<u>Configuration 5: Proposed Development with consented cumulative surrounding buildings</u>

697. This configuration includes the consented cumulative schemes identified within the 450m radius of the site which are listed above.

Pedestrian Comfort

698. During the windiest season, wind conditions on-site and in the nearby surrounding area are a mixture of frequent sitting and walking use condition. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with a larger extent of areas with sitting use wind conditions.

699. The majority of probe locations show that the proposal in this configuration would represent either a negligible or moderate beneficial effect in comparison to Configuration 1 (the “baseline”).

700. Where there are moderately adverse impacts these would be localised at the same locations as Configuration 4 with exclusion of the on-site roof level mixed use amenity on Level 22 and 30 (office terraces). Configuration 5 would create better wind conditions generally in all categories assessed and there are no additional mitigation measures which would be required over those identified in configuration 3 and 4, some of the identified on-site mitigation would also no longer be required.

Strong Winds

701. The potential strong winds would remain as per Configuration 4. This would be an instance of strong winds exceeding the safety threshold as a result of the Proposed Development albeit a slight betterment of the 8th level terrace on 30-35 Fenchurch.

Configuration 6: Proposed Development with consented and non-consented cumulative surrounding buildings

702. This configuration includes the consented and non-consented cumulative schemes identified within the 450m radius of the site, which are listed above.

Pedestrian Comfort

703. During the windiest season, wind conditions on-site and in the nearby surrounding area are a mixture of frequent sitting and walking use condition. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with a larger extent of areas with sitting use wind conditions.

704. The majority of probe locations show that the proposal in this configuration would represent either a negligible or moderate beneficial effect in comparison to Configuration 1 (the “baseline”). Where there are moderately adverse impacts these would be localised at the same locations as Configuration 5.

Strong Winds

705. The potential strong winds would remain as per Configuration 5.

Configuration 7: Proposed Development with consented cumulative surrounding buildings, existing and proposed landscaping, and mitigation measures

706. This configuration includes the consented cumulative schemes identified and mitigation measures proposed.

Pedestrian Comfort

707. During the windiest season, wind conditions on-site and in the nearby surrounding area are a mixture of frequent sitting and walking use condition. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with a larger extent of areas with sitting use wind conditions.

708. The majority of probe locations show that the proposal in this configuration would represent either a negligible or moderate beneficial effect in comparison to Configuration 1 (the “baseline”). Where there are moderately adverse impacts these would be localised at the same locations as Configuration 6.

Strong Winds

709. The potential strong winds would remain as per Configuration 4 and 5.

<u>Configuration 8: Proposed Development with consented and non-consented cumulative surrounding buildings, existing and proposed landscaping, and mitigation measures</u>

710. This configuration includes the consented and non-consented cumulative schemes identified and mitigation measures proposed.

Pedestrian Comfort

711. The majority of probe locations show that the proposal in this configuration would represent either a negligible or moderate beneficial effect in comparison to Configuration 1 (the “baseline”). Where there are moderately adverse impacts these would be localised at the same locations as Configuration 7.

Strong Winds

712. The potential strong winds would remain as per Configuration 4, 5, 6 and 7.

<u>Conclusion</u>

713. In general, the proposed development would have a beneficial impact to the pedestrian comfort along Fenchurch Street, notably the existing established unsafe conditions outside 20 Fenchurch Street. The proposed mitigation would ensure that where there are moderately adverse effects (i.e. a change in wind category) on site these localised areas would still be suitable for the intended use. The inclusion of consented (and non-consented) cumulative schemes would make conditions generally more comfortable around the site, and conditions

remain suitable for all intended uses or consistent with (or better than) the future baseline conditions.

714. There is however one instance of strong wind exceeding the safety threshold which is highlighted in the majority of the above configurations. This instance of strong wind exceeding the safety threshold in the baseline scenario is however made better as a result of the proposed development on the western 8th level terrace on 30-35 Fenchurch which would represent a long-term local major beneficial (not significant) effect.

715. A condition is proposed that would secure all necessary wind mitigation and in the instance that not all cumulative schemes are built out, potential wind mitigation measures identified earlier in this report would be secured in the S106 Agreement.

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

717. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan Policy 7.6, London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight, Overshadowing

718. Policy D6(D) of the London Plan states that the design of development should provide sufficient daylight and sunlight to (new) and surrounding housing that is appropriate for its context.

719. 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.

720. Emerging City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings

and other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.

721. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the draft City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

722. The BRE guidelines 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

Interpreting results

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

Overshadowing

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

Assessment

725. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the BRE Guidelines and considered having regard to Policy D6 of the London Plan, Policy DM10.7 of the Local Plan 2015 and Policy DE7 of the emerging City Plan 2040. Part D of Policy D6 of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight of sunlight levels may be adversely affected. Local Plan Policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The emerging City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.

726. The supporting text for Policy DE7 of the emerging City Plan 2040 goes on to state that developers will be required to submit daylight and sunlight assessments and undertake radiance studies in support of their proposals.

727. The study area is defined with the documentation as sensitive properties which have windows facing on to the site and that are considered in close enough proximity to the site to be affected by the proposed development, as well as amenity areas considered in close enough proximity to be affected by shadow cast from the proposed development. Given the rather unique nature of the ‘city cluster’ and surrounding properties there is a very limited number of sensitive receptors which surround the site.

728. The buildings (incl. residential, mixed use, religious) to be considered are:

- 2-4 Bull’s Head Passage
- The Bunch of Grapes – 14 Lime Street
- All Hallows Staining Tower

729. Officers note that All Hallows Staining Tower is not currently used as for religious purposes sensitive to daylight and sunlight changes, however, has been considered a sensitive receptor for completeness

730. The surrounding amenity areas to be considered are:
- The Garden@120 Fenchurch Street (existing receptor)
- Fen Court Garden (existing receptor)
- Outdoor seating along Fenchurch Avenue (existing receptor)
- Lime Street (existing receptor)
- Leadenhall Market (existing receptor)
- St Helen's Church courtyard (existing receptor)
- St Helen's Church Garden (existing receptor)
- 50 Fenchurch Street Roof Terrace (future receptor)

731. The following scenarios have been assessed:
- Existing Baseline
- Proposed Development (with existing surrounds)
- Cumulative Developments (proposed development with cumulative surrounds)

732. The cumulative schemes include 50 Fenchurch Street (Planning ref: 19/01307/FULEIA), 70 Gracechurch Street (Planning ref: 24/00825/FULEIA), 85 Gracechurch Street (Planning ref: 22/01155/FULEIA, 60 Gracechurch Street (Planning ref: 24/00743/FULEIA), 100, 106 & 107 Leadenhall Street (Planning ref: 22/00790/FULEIA), 1 Undershaft (Planning ref: 23/01423/FULEIA), 65 Crutched Friars (Planning ref: 22/00882/FULMAJ), 55 Bishopsgate (Planning ref: 22/00981/FULEIA), 99 Bishopsgate (Planning ref: 24/00836/FULEIA)and 1, 2 Minster Court (Planning ref: 24/05981/EIASCO).

733. When referring to the degree of impact (negligible, minor, moderate etc.) in this report, officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. Officers agree with these judgements reached in the Environmental Statement and daylight/sunlight review when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement in forming a judgement on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (Part D of London Plan

Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (emerging City Plan Policy DE7).

734. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same daylight/sunlight test requirements as residential properties. The dense urban environment of the city in and around the Cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premisses, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in this respect.

Daylight and Sunlight – Existing Baseline

735. The following table shows the baseline daylight and sunlight summary:

Receptor	VSC		NSL		APSH	
	Total Windows	Pasing Windows	Total Rooms	Pasing Rooms	Total Windows	Pasing Windows
2-4 Bulls Head Passage	16	0	9	0	16	0

The Bunch of Grapes – 14 Lime Street	11	0	4	0	10	1
All Hallows Staining Tower	13	0	3	2	9	9

736. Within the existing baseline, in terms of daylight, none of the 40 windows assessed for VSC in the baseline meet the BRE target value of achieving 27% VSC. Additionally, none of the 16 rooms assessed for NSL would meet the BRE criteria for receiving at least 80% NSL.

737. For sunlight, within the three properties assessed, 35 windows have been identified as site-facing within 90 degrees of due south. Of the 35 windows, 1 (2.9%) window would meet the BRE criteria of receiving 25% APSH, of which 5% occurs in the winter

738. In the existing baseline it's clear that the surrounding properties contain relatively low level of daylight and sunlight. These relatively low compliance values are typical for an inner-city urban location comprising a range of building typologies.

Daylight and Sunlight – Proposed Development

739. The following table shows the daylight and sunlight summary of the proposed development in situ within the existing surroundings:

Receptor	VSC		NSL		APSH/WPSH	
	Total Windows	Windows meeting BRE	Total Rooms	Rooms meeting BRE	Total Windows	Pasing Windows
2-4 Bulls Head Passage	16	16	9	9	16	16
The Bunch of Grapes – 14 Lime Street	11	10	4	3	10	7
All Hallows Staining Tower	13	7	3	3	9	9
Total	40	33	16	15	35	32

740. For VSC, of the 40 windows assessed, 33 (82.5%) meet the BRE Guidelines criteria. Two properties would be adversely affected in terms of daylight and sunlight. The impact on the above properties is discussed below.

2-4 Bulls Head Passage

741. This is a mixed-use property located to the west of the site, comprising of a retail on the ground and residential elements located above. 2-4 Bulls Head Passage would meet the BRE criteria across all windows and rooms for daylight and would therefore see a Negligible (not significant) effect.

742. Similarly, with regards to sunlight, the proposal would meet the BRE Guidelines criteria for APSH and WPSH (Annual/Winter Probable Sunlight Hours).

The Bunch of Grapes – 14 Lime Street

743. This is a mixed-use property, also known as 'The Grapes', is located to the west of the site, comprising of a public house on the ground and first floor with residential elements located from the first through to fourth floors.

744. For VSC, 10 of the 11 (90.9%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The sole affected window, a first-floor window serving a residential space, would experience an alteration of 21.1%, which is considered to be a Minor Adverse effect.

745. The existing VSC would decrease from 9.0% to 7.1% and as such in reality the change is likely to be unnoticeable. The existing low level of VSC would mean that any change would appear proportionately large as percentage change whereas the absolute loss of 1.9% would be minimal. Furthermore, the VSC to the room assessment indicates that the room benefits from being served by multiple apertures and therefore would remain compliant in the proposed development scenario.

746. For NSL, three of the four (75%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The sole affected room, a fourth-floor residential room of unknown use, would experience a reduction of 33.3%, considered to be a Moderate Adverse effect based on assumed layouts. Similar to the above this would be considered commensurate with the dense urban nature of the surrounding context, demonstrated by the low existing values of the first and second floor rooms of the property.

747. Overall, the effect on daylight to this property is considered to be Minor Adverse (not significant).

748. With regard to sunlight A total of 10 windows were assessed for sunlight within this building, of which seven (70%) would meet the BRE criteria for both APSH and WPSH.

749. For APSH, 7 of the 10 (70%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the three affected windows, two windows located on the second floor and serving a residential room, will retain APSH levels of 22-24%, just marginally below the suggested 25% APSH. The other affected window, located on the first floor and serving a residential room, would retain 16% APSH and experiences a reduction of 27.3%. Consideration the immediate surrounds of the property located within the city cluster and the dense urban nature of the context, as well as the presence of two BRE compliant windows serving the same room, the retained levels can be considered appropriate with the space retained a good level of sunlight. This is consistent with surrounding levels both within the property and adjacent other larger developments in the cluster and therefore considered acceptable by officers.

750. For WPSH, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

751. Overall, given the high level of compliance and retained APSH values, the effect to sunlight to this property is considered to be Minor Adverse (not significant).

All Hallows Staining Tower

752. This property located to the southeast of the site, consisting of a ground plus two storey church tower. Officers note that All Hallows Staining Tower is not currently used as for religious purposes and is to be redeveloped as part of the 50 Fenchurch Street development.

753. For VSC, 7 of the 13 (53.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. All six of the affected windows would experience an alteration in VSC between 20- 29.9% which is considered a Minor Adverse effect. All of the windows would experience similar impacts, with reductions ranging from 25.9-26.4%, with no window experiencing an absolute change of more than 4.6%. Similar to the above, with the absolute change being limited it is not likely to be significantly noticeable for occupiers.

754. In terms of NSL all of the assessed rooms would meet BRE criteria.

755. With regard to sunlight, the proposal would meet the BRE Guidelines criteria for APSH and WPSH (Annual/Winter Probable Sunlight Hours).

Daylight and Sunlight – Cumulative Development

756. The following table shows the daylight and sunlight summary of the proposed development in the cumulative surroundings:

Receptor	VSC		NSL		APSH/WPSH	
	Total Windows	Windows meeting BRE	Total Rooms	Rooms meeting BRE	Total Windows	Pasing Windows
2-4 Bulls Head Passage	16	7	9	7	16	8
The Bunch of Grapes – 14 Lime Street	11	2	4	4	10	1
All Hallows Staining Tower	13	5	3	1	9	2
Total	40	14	16	12	35	11

757. For VSC, of the 40 windows assessed, 14 (35%) meet the BRE Guidelines criteria and for NSL 12 of the 16 (75%) meet BRE Guidelines criteria. The impact on the above properties is discussed below.

2-4 Bulls Head Passage

758. For VSC, 7 of the 16 (43.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the nine affected windows, seven would experience an alteration between 20-29.9% which is considered a Minor Adverse effect whilst two windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect.

759. Similar to the above assessment, of the affected windows, these all have low levels of existing VSC and none would experience an absolute alteration beyond 3.6%. Officers therefore consider these would experience a disproportionate percentage loss from any absolute loss and acceptable on this basis.

760. For NSL, seven of the nine (77.8%) rooms assessed would meet the BRE criteria and are therefore considered to experience a Negligible effect. Again, of the two rooms effected both possess an existing NSL of less than 16.5% wherein any further absolute loss will result in a disproportionate percentage loss.

761. Overall, the cumulative effect on daylight to this property is considered to be Moderate Adverse (significant). However as detailed through Configuration 2 Proposed development within the existing surrounds) as the proposed development does not affect this property beyond BRE's recommendation, the additional effects are a function of the cumulative developments.

762. A total of 16 windows were assessed for sunlight within this building, of which eight windows (50%) would meet the BRE's criteria for both APSH and WPSH. Of the eight affected windows, two would experience an alteration between 20-29.9% considered a Minor Adverse effect, three would experience an alteration between 30- 39.9% considered a Moderate Adverse effect, and three would experience an alteration in excess of 40% considered a Major Adverse effect.

763. Overall, the cumulative effect on sunlight to this property is considered to be Major Adverse (significant) however these significant impacts are attributed to the surrounding cumulative developments rather than the proposed.

The Bunch of Grapes – 14 Lime Street

764. For VSC, 2 of the 11 (18.2%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the nine affected windows which are located across the first to fourth storey, three would experience an alteration between 20-29.9% which is considered a Minor Adverse effect. The remaining six windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect and are located on the first and second floors of the property.

765. For NSL, all of the four assessed rooms would meet the BRE's criteria and are therefore considered to experience a Negligible effect.

766. Overall, the cumulative effect on daylight to this property is considered to be Moderate Adverse (significant) however these significant impacts are attributed to the surrounding cumulative developments rather than the proposed.

767. With regard to sunlight a total of 10 windows were assessed for sunlight within this building, of which one (10%) would meet the BRE's criteria for both APSH and WPSH. Of the nine affected windows, all would experience an alteration in excess of 40% and are therefore considered to experience a Major Adverse effect. The cumulative effect on sunlight to this property is considered to be Major

Adverse (significant) however these significant impacts are attributed to the surrounding cumulative developments rather than the proposed.

All Hallows Staining Tower

768. For VSC, 5 of the 13 (38.5%) windows assessed would meet BRE's criteria are therefore considered to experience a Negligible effect. Of the eight affected windows, all would experience an alteration in excess of 40% and are therefore considered to experience a Major Adverse effect. The submitted report details that these impacts can be exclusively attributed to the 50 Fenchurch Street development in the cumulative development scenario.

769. For NSL, one of the three (33.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The two affected rooms that do not meet BRE's criteria would experience an alteration in excess of 40% and are therefore considered to experience a Major Adverse effect which again can be attributed to the 50 Fenchurch Street development.

770. Overall, the cumulative effect on daylight to this property is considered to be Major Adverse (significant) albeit this can be attributed to the 50 Fenchurch Street development.

771. With regard to sunlight, a total of nine windows were assessed for sunlight within this building, of which two windows (22.2%) would meet the BRE's criteria for both APSH and WPSH. Of the seven affected windows, one would experience alteration between 20-29.9% which is considered a Minor Adverse effect and six would experience an alteration in excess of 40% considered a Major Adverse effect. The cumulative effect on sunlight to this property is considered to be Major Adverse (significant) however these significant impacts are attributed to the surrounding cumulative developments rather than the proposed development.

<u>Conclusion on Daylight and Sunlight Impact</u>

772. In conclusion, it is considered that the submitted Daylight, Sunlight and Overshadowing report has correctly used the methodology assessing daylight and sunlight in accordance with the latest BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.

773. Considering the proposed development as being in situ with the existing surrounds, 40 windows assessed for VSC, 33 (82.5%) meet the criteria outlined

in the BRE Guidelines (2022). Of the 16 rooms assessed for NSL, 15 (94%) meet the criteria in line with the BRE Guidelines (2022).

774. Of the above Officers further note that the residential properties of 2-4 Bulls Head Passage meet the BRE criteria in their entirety and the residential element of 'The Bunch of Grapes' (14 Lime Street) would in its majority also meet the criteria, with only one window seeing a 'noticeable reduction VSC' and one room a reduction in NSL greater than the BRE guidance levels. These properties and residential elements would therefore, in general, retain a high level of daylight and sunlight and as such considered acceptable.

775. Officers acknowledge that All Hallows Staining Tower would experience impacts greater than the BRE guidance levels, however the impacts are similar to comparable properties in the vicinity of the site that are located in a dense urban environment. Furthermore, with the future construction of 50 Fenchurch Street this property would be significantly comprised by this development and also it would essentially be shielded from the proposed development under this application given its future surrounds.

776. As a result, is not considered that the daylight and sunlight reductions would warrant refusal of the application on those grounds. The scheme is considered complying with policy DM10.7 of the Local Plan 2015. The daylight and sunlight for these properties is considered to be appropriate for their context in accordance with policy D6(d) of the London Plan 2021 and policy DE7 of the draft City Plan 2040, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

Overshadowing of amenity spaces

777. 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

778. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area.

779. BRE Guidelines (2022) suggest that 'sun hours on ground' assessment should be undertaken on the 21st March. It is recommended that at least half of an

amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

780. In terms of overshadowing, the following open spaces, as sensitive receptors, have been assessed:

- The Garden@120 Fenchurch Street (existing receptor)
- Fen Court Garden (existing receptor)
- Outdoor seating along Fenchurch Avenue (existing receptor)
- Lime Street (existing receptor)
- Leadenhall Market (existing receptor)
- St Helen's Church courtyard (existing receptor)
- St Helen's Church Garden (existing receptor)
- 50 Fenchurch Street Roof Terrace (future receptor)

Existing Baseline

781. Considering the existing baseline (i.e. the existing building within the existing surrounding context) of the open spaces considered for overshadowing only one (Garden@120 Fenchurch Street) meets the suggested BRE target of 50% of the area receiving two or more hours of direct sunlight on the 21st March, likely due to its elevation. These low compliance values are typical for an inner-city urban location comprising a range of building typologies.

Proposed Development

782. This configuration considers the proposed development within the existing surrounds and includes all the above receptors apart from 50 Fenchurch Street (as this is classed as a future receptor).

783. In terms of sun hours on ground, six of the seven amenity areas assessed for SHOG would retain the same proportion of area that receives two or more hours of direct sunlight on 21st March and would not be impacted by the Proposed Development. The effects are therefore considered Negligible.

784. The submitted documentation describes how Fen Court Garden is the only receptor which following the proposed development does not meet the BRE criteria for SHOG. With only 7% of the total area seeing two hours of direct sunlight on 21st March this would be reduced to 0% with the proposed

development. Therefore, the effects of the proposed development are considered as Moderate Adverse (significant). However, the submitted documents show that this area only just meets the two hours threshold currently, meaning that the absolute alteration of direct sunlight is limited in reality.

785. For clarity the Garden@120 Fenchurch Street would remain well sunlit throughout the morning in the baseline condition and shading from the proposed development can be seen from 13:00 GMT onwards. This would be in compliance with the BRE criteria.

Cumulative Development

786. With the surrounding context of emerging schemes being considered within the assessment again, Fen Court Garden is the only receptor which does not meet the BRE criteria for SHOG. Of note however, this area only just meets the two hours threshold currently, meaning that the absolute alteration of direct sunlight is limited in reality. The Proposed Development would result in a significant adverse overshadowing effect to Fen Court Garden, however once 50 Fenchurch Street is constructed this would result in the same impact (none of Fen Court Garden receiving two hours of direct sunlight on 21st March) and result in the same significant adverse overshadowing effect.

787. Additionally, the results of the assessment show that, despite some additional instances of overshadowing, the Garden@120 Fenchurch Street remains well sunlit according to the BRE criterion and the overall effects therefore remain as reported for the proposed development scenario.

788. In conclusion, the results show that there would be a significant adverse effect of overshadowing on Fen Court Garden. While this reduction (from 7% of the total area seeing two hours of direct sunlight on 21st March to 0%) would be considered an adverse effect from the development in reality the area only just meets the two-hour threshold and as such the absolute alteration to direct sunlight would be limited. Furthermore, Officers note that the following the implementation of 50 Fenchurch Street this development would effectively result in the same impact (none of Fen Court Garden receiving two hours of direct sunlight on 21st March) and result in the same significant adverse overshadowing effect. Therefore while there is an adverse effect from the proposed development this would be in place following a neighbouring development regardless and the actual change would be minimal. The proposal is therefore considered to comply with, Policy D6 of the London Plan, DM10.7 of the Local Plan and DE7 of the emerging City Plan 2040.

Solar Glare

789. Glare is the discomfort or impairment of vision caused by excessive or large contrast in luminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare; distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).

790. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.

791. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.

792. The 20 locations have been identified in the ES as sensitive to solar glare. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings at these locations. The assessment considers the potential occurrence of solar reflections at these locations from the Proposed Development owing to its size and areas of glazing on the façade. The duration of solar reflections as well as their proximity to a road user's line of sight have been considered.

793. The proposed development is not considered to be visible from 15 viewpoints.

794. The remaining five viewpoints could potentially see instances of solar reflections within 10 and 30 degrees of the driver's line of sight for short periods of time. These viewpoints would therefore experience a Minor Adverse (not significant). These are the worst-case points.

795. Overall, the potential impact of solar glare from the proposed development is considered at it worse to be Minor Adverse but the effects are not significant. The assessment concludes that no additional measures are required to mitigate the impact of solar glare.

796. If planning permission were to be granted, a S.106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9 of the London Plan, Local Plan Policy DM10.1 and emerging City Plan 2040 Policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

797. Light spillage is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from commercial buildings onto residential accommodation, where this would cause nuisance to the occupants. It is measured through light intrusion assessments – this is the spilling light beyond the boundary of a proposed development, and it is assessed through vertical illuminance in lux, measured flat at the centre of the sensitive receptor.

798. Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. Draft policy HS3 (Residential Environment) states that light spill from development that could affect residential areas should be minimised in line with policy DE8 and the Lighting SPD.

799. The Site and its surroundings are defined as a high distinct brightness, which the Institute of Lighting Practitioners (ILP) Guidance Notes classify as Environmental Zone 4 (E4). Within E4, the recommended limit of light spillage is 25-lux pre-curfew (11pm) and 5-lux post-curfew.

800. A Lighting Strategy and Concept document has been submitted in support of the application and this details compliance with the above. While there are no residential properties within 50m of the proposed development target light levels have been proposed for the public realm, drawing on guidance from the City of London Lighting Vision 2018, subsequent City of London SPD 2023, and recommendations of the Society of Light and Lighting.

801. While the proposed lighting would be relatively modest at ground floor level the submitted document seeks to make an opportunity for more dynamic lighting within the recessed terraces, the distinctive roof top plant and the proposed building crown. The submitted Lighting Strategy provides an appropriate overview of the potential lighting however a condition is imposed requiring the

submission of a detailed lighting strategy prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

802. Subject to the satisfaction of this condition, the development would comply with Local Plan Policy DM 15.7 and emerging City Plan 2040 Policy DE8 and has been designed to avoid light spill.

Thermal Comfort Assessment

803. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the Emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood, must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

804. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

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

806. Five configurations have been assessed comprising; (i) Existing site with existing surrounding buildings, (ii) Existing site with consented cumulative schemes, (iii) Proposed Development with existing surrounding buildings, (iv) Proposed Development with consented cumulative schemes, (v) Proposed development with consented and non-consented cumulative schemes.

Usage Category	% of hours with Acceptable UTCI	Description	Colour (HTML Colour Code)
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green (#378c4b)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple (#c86ebe)
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan (#1effff)
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange (#fab92d)
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red (#de2d26)

Thermal Comfort Criteria (extract from City of London Thermal Comfort Guidelines (2020)

807. The outdoor thermal comfort assessment identified the sensitive receptors at the ground level and the elevated areas of the proposed development and the cumulative schemes. At ground level, the receptors are entrances to buildings, spill-out spaces and general public amenity spaces. The acceptable thermal comfort categories for these receptors are set out as short-term or better for the entrances and all seasonal or seasonal for the spill-out and public amenity spaces depending on their intended use on a year-round basis. At elevated areas, short-term thermal comfort category has been considered as acceptable for terraces and balconies offering amenity spaces which are only suitable for a short duration/ infrequent sedentary use.

Configuration (i): Existing site with existing surrounding buildings (Baseline)

808. In the existing baseline scenario, there is appropriate comfort for most of the year. Conditions range between all-season, seasonal, short-term and short-term seasonal.

809. When looking at comfort, conditions at ground level were predominantly all-season and seasonal in most locations. Short-term conditions were predicted to the south of 120 Fenchurch Street, and further West along Fenchurch Street towards Rood Lane. At the existing site, the public realm courtyard around Fen Court Gardens is categorised as having all-season comfort whilst the north-south footway on Fen Court is in the seasonal category.

810. For ease of reference, the figure below (extract from the Thermal Comfort Assessment prepared by Gia, Figure 11) shows the Existing Baseline conditions at ground floor level.



Thermal Comfort Conditions at Ground Level (extract from Thermal Comfort Assessment (21097), prepared by Gia).

Configuration (ii): Existing site with consented cumulative schemes

811. This configuration assesses the impact of surrounding consented schemes compared to the baseline (i.e. future baseline).

812. The ground level pedestrian spaces in the vicinity of the site are a mixture of transient spaces (i.e. pavements and cycle paths) and amenity seating areas.

813. Conditions at the ground level of the site would improve in comfort. In particular, conditions on Cullum Street and Lime Street would benefit from comfortable all-season conditions in a majority of locations.

814. The inclusion of the consented cumulative schemes would show the marginally increased levels of comfort in localised areas but overall would present the same distribution and levels of comfort conditions as the baseline.

Configuration (iii): Proposed development with existing surrounding buildings

815. The cumulative schemes included in the thermal comfort assessment would be as used for the wind microclimate assessments. These are mentioned at the previous section of this report.

816. In this configuration, the proposed development would result in a less comfortable environment compared to the baseline in areas immediately surrounding the site. However, off-site areas to the south, west and north will be more comfortable, particularly when considering elevated terraces.

817. Regarding thermal comfort conditions at ground level, the proposed development and cumulative schemes would increase the areas of short-term thermal comfort (i.e., have a negative impact) along Fen Court (including Fen Court Gardens) to the east of the site, along Cullum Street and along Fenchurch Street to the southwest.

818. Overall, though pockets of decreased comfort would be present, it is anticipated that the thermal comfort levels will be suitable for the intended pedestrian activities. Fen Court Gardens would be suitable for a mix of seasonal and all-

season use, seating in Cullum Street would be suitable for seasonal use, Fenchurch Street Food Market would be suitable for all-season use.

819. In terms of thermal comfort conditions at the proposed outdoor terraces, these would be suitable for all-season or seasonal use across the majority of each terrace. This would permit for sufficient usability of the terrace and satisfies the target condition.

820. An assessment was conducted for the effect of the proposed development's impacts on nearby off-site terraces. At 30-35 Fenchurch Street, the terraces at levels 14,10 & 7 would be suitable for a mix of all-season, seasonal, short-term and short-term seasonal use, this is consistent with the baseline. At 50 Fenchurch Street, terraces would be suitable for a mix of all-season, seasonal, short-term and short-term seasonal use, this is an increase in comfort compared to the baseline condition. At 120 Fenchurch Street, roof terraces would be suitable for a mix of all-season, seasonal, short-term and short-term seasonal use. This is an increase compared to the baseline and future baseline conditions.

Configuration (iv): Proposed Development with consented cumulative schemes

821. This configuration includes the proposed development in the future baseline scenario. This results in windier conditions than the future baseline immediately around the site, but calmer off-site to the south-west and north.

822. The new public realm situated within the servicing area of the building would provide areas of increased comfort with areas of all season comfort. Fen Court gardens would remain an acceptable level of comfort with a slight increase of all season areas.

823. On-site elevated terraces, these would be suitable for all-season or seasonal use across the majority of each terrace. This would permit for sufficient usability of the terrace and satisfies the target condition.

824. Off-site elevated terraces. At 30-35 Fenchurch Street, the terraces at levels 14,10 & 7 would be suitable for a mix of all-season, seasonal and short-term use. At 50 Fenchurch Street, terraces would be suitable for a mix of all-season, seasonal and short-term use. At 120 Fenchurch Street, roof terraces would be suitable for a mix of all-season, seasonal, short-term and short-term. All three of these sites see an increase in comfort compared to configurations (i), (ii) and (iii).

Configuration (v): Proposed Development with consented and non-consented cumulative schemes

825. Compared to configuration (iv), there are no material differences in thermal comfort conditions cause by the inclusion of non-consented cumulative schemes which would impact the suitability of conditions at both ground and terrace levels.

Thermal Comfort Conclusion

826. The proposed development has been suitably and sufficiently assessed in relation to its impact on thermal comfort, in line with City of London guidance.

827. It is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Air Quality

828. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments 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 of the 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.

829. The application is accompanied by an Air Quality Assessment (Arup), which includes assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development.

830. The Proposed Development is located within the City of London Air Quality Management Area (AQMA) which was designated due to exceedances of the air quality objectives. The Air Quality Positive approach as recommended by policy HL2 of the emerging City Plan 2040 has been undertaken throughout the design of the proposed development in line with the GLA Air Quality Positive Guidance

2023, and an Air Quality Positive Statement has been submitted with the application.

831. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

832. The proposed development would be car free and be fully electric in relation to building emissions. There would be one unit of 2,200kVA backup generator powered by diesel of which the purpose of the generator is for life safety use only. A vertical flue has been proposed, terminating 1m above roof level and will not be located near any public amenities or air intakes for the proposed ventilation system. Alternatives to diesel generators have been explored and it is understood that battery and gas options are not considered suitable due to the efficiency, fuel supply and performance. The total operational hours for testing will be kept to a minimum amount, as per manufacturer guidance, which will be less than 18 hours per year which is considered acceptable. Additionally, the dispersion of these emissions would take place at roof top level where dispersion is high and ground floor level concentrations would be minimal.

833. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. Measures that were considered during the design phase to have a positive impact on air quality include minimising traffic generated, and utilising a low or zero emission energy strategy.

834. The City's Air Quality Officer has no objections, subject to the imposition of conditions regarding the installation of a generator, installation of combustion flues and Non-Road Mobile Machinery Registration. As discussed above, the Air Quality Officer has also requested that a condition restricting the number of daily trips is imposed.

835. Subject to conditions, the proposed development would have a minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan Policy 2015 policy policies HL2 and DE1 of the draft City Plan 2040, and Policy SI1 of the London Plan which all seeks to improve air quality.

Noise and Vibration

836. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.

837. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.

838. Within the submitted Environmental Statement the nearest existing noise and vibration sensitive receptors have been considered and a total of 19 have been identified. The majority of these are office based or amenity areas (for example Garden@120 Fenchurch Street) with four residential elements being identified.

839. In most City redevelopment schemes one of the main noise and vibration issues occur during demolition and construction phases. The relevant chapter within the Environmental Statement states that a construction method will be adopted to reduce noise levels. Plant and generators will be carefully selected. Noisy activities will be limited to minimise impacts on existing receptors and working hours will comply with the CoL restrictions. Several noise and vibration control measures and monitoring are proposed to be incorporated.

840. Noise and vibration mitigation during the deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Demolition, and a Construction and Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

841. The proposed development provides for active uses at lower levels, including retail, food and beverage, and cultural uses. At this stage specific users have not been identified so the precise commercial activity and associated noise level cannot be accurately defined however, the levels of noise generated from the likely type of commercial activity are expected to be relatively low and not dissimilar to the activity generated by the existing ground floor commercial uses.

842. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces and balconies, as well as a restriction on the use of amplified music on these terraces. Operational management plans for the Public Terrace and Cultural Provision would be secured via a S106 agreement, and these will be expected to set out the appropriate noise control measures to minimise disturbance to nearby sensitive receptors. The appropriate noise control measures are likely to be largely based around opening hours and effective security.

843. Environmental health officers have confirmed, that subject to the recommended conditions, they would have no objections with regard to the noise impacts.

844. The submitted Environmental Statement considers the impact of the development on the noise environment. Subject to a series of conditions to mitigate noise and vibration during the deconstruction/construction and operational phases of the development, the proposed development would comply with polices D13 and D14 of the London Plan and policy DM15.7 of the Local Plan (2015).

Overlooking and Overbearing Impacts

845. Local Plan policy DM21.3 and draft City Plan 2040 policy seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and Draft City Plan 2040 assess residential amenity and not the amenity of office occupiers.

846. 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.

847. 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 or sensitive properties.

848. The proposed development would include both office and public/cultural terraces at upper floor levels. The immediate surrounding properties mainly consist of the commercial uses and therefore this continued relationship between adjacent commercial uses is very typical within the immediate context and the wider City. Where residential properties are located within the vicinity, these are away from the immediate surrounds of the building and the additional impact of the terraces

and office use would not cause additional overlooking opportunities to that of the existing dense urban environment.

849. The proposed development would result in an increased massing and height. The proposed development would be located away from residential units and it is considered that by reason of the nature of the dense urban environment and separation distance, the proposal would not result in a greater impact to the nearby units than that already caused by other existing buildings. It is therefore considered that the development would not be reasonable to be refused on the grounds of resulting in an unacceptable overbearing impact to the nearby residential properties.

850. The proposals would not result in any undue overlooking, loss of privacy or overbearing impact. As such, it would comply with Local Plan policy DM21.3 and CS5 and policies HS3 and S23 of the draft City Plan 2040.

Contaminated Land

851. Local Plan policy DM15.8 and draft City Plan 2040 policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential of pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

852. Policy S1 of the emerging City Plan 2040 expects developers to address land contamination.

853. A Ground Contamination Risk Assessment And Remediation Strategy accompanies the application including a desk-based study to identify contamination and/or geotechnical constrains of the proposed development and whether additional investigation or remediation works would be required.

854. The assessment details how the site is underlain by ‘Made Ground’ and superficial deposits of Langley Silt and Taplow Gravel (River Terrace Deposits) over solid geology of London Clay, Lambeth Group, Thanet Formation and Chalk. The report concludes that the site is assessed as having an overall low contamination potential, except for the potential presence of asbestos containing material.

855. The development of the three-storey basement would essentially remove the Made Ground and potential contamination including asbestos and sources of ground gas. The proposed building (and basement) would cap the site and would remove any plausible contamination linkages associated with the end-use.

856. The report concludes with a proposed remediation strategy to prevent any risk of harm to human health. The strategy focuses on managing risks during construction associated with any works that break ground. It includes a watching brief and discovery strategy, a strategy for dealing with previously unidentified contamination and outlines the requirements for verification testing and testing of any imported aggregates and soils.

857. Environmental Health Officers have suggested a condition in respect of site investigation and a risk assessment to establish if the site is contaminated and a condition in respect of the process/remediation if contamination is found when carrying out the works. Thames Water have also requested a condition in respect of a piling method statement. Subject to the imposition of conditions, the proposal is in accordance with Local Plan policy DM15.8 and policies S1 and HL4 of the draft City Plan 2040.

Sustainability

858. The City of London's 'Planning for Sustainability' Supplementary Planning Document (SPD) was formally adopted on 19th February 2025. The purpose of the SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the application process. It has been prepared to provide additional detail and guidance on how to fulfil policies of the London Plan, adopted Local Plan 2015, as well as emerging policies within the City Plan 2040. The SPD is now a material consideration in determining planning applications, however as set out in the SPD, the requirements will only be applied to applications submitted after its adoption. Although the requirements of the SPD do not apply to the proposed development at Fenchurch Street, the application has been reviewed with the emerging guidance in mind (and in accordance with existing local plan policies relating to sustainability) to ensure the scheme delivers the best outcome possible in terms of sustainability. As such, the scheme is considered to be in general compliance with the actions recommended in the SPD.

Circular Economy

859. London Plan Policy SI7 (‘Reducing waste and supporting the circular economy’) sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City’s support for circular economy principles. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 strategic policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options. The Planning for Sustainability SPD, adopted in February 2025, contains further guidance about how applicants are expected to address the GLA’s Circular Economy guidance and the Whole Life-Cycle Assessment guidance, and how to fulfil the current and emerging Development Plan Policies on circular economy and whole life-cycle carbon emissions.

860. To address these policies, the application explored opportunities to retain and refurbish the buildings or building elements currently on site. This information is presented in the pre-redevelopment audit, Carbon Options assessment, pre-demolition audit and Circular Economy Statement.

861. The redevelopment appraisal concluded that there is limited scope for extensions across the existing structure, and retention of the existing structures would significantly limit the opportunities of the site:

- to deliver best-in class office space that
    - provides tenant amenities
    - provide floor plate areas of a sufficient size and flexibility required by many potential tenants
    - introduces end of trip facilities
    - provides sufficient toilet provisions to BCO standards
- to deliver new and improved public facilities, including improvements to the public realm, new F&B offerings, cultural spaces and public terraces.

862. The application proposal is for full demolition of existing buildings and construction of a new office tower.

Existing building

863. The existing building comprises of a 14-storey superstructure in the centre of the site, a 2-storey podium to the east and west, and two 8-storey wings to the north. There is a single storey split-level basement containing underground car parking to the north. Additionally, there is a large sub-basement to the West which was originally utilised as fuel storage.

864. The building comprises 13,408m^2 of GIA and 10,717m^2 of NIA.

865. The construction of the existing building is estimated to have been completed in the late 1950's and an interior refurbishment is understood to have taken place during the mid-1990's. An extension to the west podium was undertaken in 2001.

866. The existing building has been vacant since April 2022, except for a Pret a Manger retail unit over of a portion of the ground floor. Internal strip-out works were completed in 2024 and the office areas have been decommissioned.

867. The building frame is formed by steelwork columns and beams encased in concrete. There is limited scope for extension of the tower without undertaking significant intervention works to strengthen the existing structure and meet current wind loading and robustness requirements. The columns are founded on concrete pad footings, not on piled foundations. The pad footings are configured in a dense array, limiting the ability to 'pile-through' the existing basement slab. The east podium is subject to a lower density of existing foundations and could support additional storeys, however extension of the western podium is constrained due to the sub-basement. Therefore, there is limited scope for extensions across the existing structure.

868. The façade comprises of outer single glazing, internal secondary glazing, back painted glazing spandrels, Crittall steel outer frames, aluminium internal frames and Portland stone. The overall performance of the existing façade is poor.

869. All MEP systems have reached the end of design life and were stripped out during the interior strip out.

870. Key reasons given for justifying the demolition of the existing structures are listed below:

- The depth and adjacencies of the pad footing concrete foundations effectively prohibit 'piling-through' the majority of the existing basement slab. If an increase in load is required at basement level, excavation and removal of the existing foundations is likely to be required.
- The structural grid impacts floor layout flexibility and there's a limited offering of office space (6,216m^2).
- The current Energy Performance Certificate (EPC) rating of office space is D. This would render the building unlettable if the Government's projected Minimum Energy Efficiency Standards (MEES) are formalised in 2030.
- Very low floor to floor (3.2m) and floor to ceiling (2.4m) heights do not meet current BCO requirements and would impact commerciality.
- Poor public realm interface resulting from no setbacks and narrow pavement widths, limited connectivity between external and internal spaces, misalignment of the ground floor with pavement levels.
- Poor accessibility. The main entrance is not wheelchair accessible and does not meet current standards for inclusive access or egress.
- Poor façade performance as most façade components have reached end of life.
- No greening or biodiversity.
- Very low-quality office space with no end of trip facilities, no access to external space, small and inflexible floorplates, washroom provision does not meet BCO standards.
- The existing building doesn't comply with fire regulations. An increase in the stair core could be required as current access to fire escape is, in some instances, through windows to a shared means of escape with adjacent buildings.

Pre-Redevelopment Audit Optioneering

871. A pre-redevelopment audit and options assessment was undertaken in line with the City's Carbon Options Guidance. A 3rd party review confirmed the assessment is compliant with City policy.

872. A total of 4 development options, were considered as summarised below:

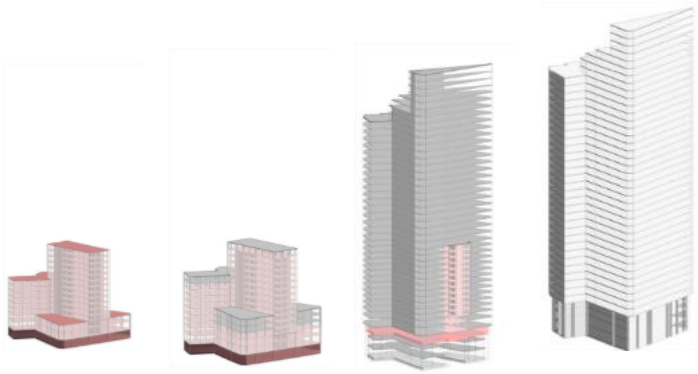
- <u>Option 1 – Minimum refurbishment.</u>
    - Full replacement of façade, MEP, internal finishes and FF&E. Compliance with fire regulations.
    - 13,408m^2 GIA, 6,216m^2 NIA.

- Option 2 - Refurbishment and minor extension.
    - Minor demolition to elements of the podium. Provides maximum NIA with limited strengthening. Full replacement of façade, MEP, internal finishes and FF&E.
    - 17,498m^2 GIA, 9,284m^2 NIA.

- Option 3 - Refurbishment and major extension.
    - Minor demolition of the podium and back extension. Retention of the main core, plus a new transfer structure erected to the full permissible width and height of the site. Full replacement of façade, MEP, internal finishes and FF&E.
    - 73,115m^2 GIA, 40,152m^2 NIA.

- Option 4 – New build construction.
    - Full demolition of the existing structures. Construction of a new structure to the full permissible width and height of the site,
    - 70,771m^2 GIA, 43,340m^2 NIA.

873. *Comparison of carbon options*



	Option 1	Option 2	Option 3	Option 4
Gross Internal area (GIA) m²	13,408	17,498	73,115	70,771
Increase in NIA (over existing)	0	3,068	33,936	37,124
Substructure % retained (by mass)	100	100	50	0
Superstructure % retained (by mass) (*frame, upper floors, roof, stairs, ramps*)	100	100	43	0
Superstructure % retained (by area) (*external walls, windows, external doors*)	0	0	0	0

Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *exc. sequestration*	632	723	1,071	1,085
In-use & End of Life Embodied Carbon (B-C) ($kgCO_2e/m^2$ GIA) *excl. B6 & B7*	494	482	469	472
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	1,126	1,205	1,540	1,557
Fuel source	Electricity	Electricity	Electricity	Electricity
Whole Building Operational Energy Use (kWh/m² GIA per year)	53	61	49	55
Whole Building Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	108.8	124.5	100.8	112.4
Target EPC rating	A	A	A	A
Total WLC Intensity (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) *B7 not considered*	1,237.8	1,332.5	1,647.6	1,682.4
Upfront Embodied carbon (A1-A5) (tCO_2e)	8,474	12,651	78,306	76,787
In-use embodied carbon (B-C) (tCO_2e)	6,624	8,434	34,291	33,404
Operational carbon for building lifetime (B6) (tCO_2e)	1,458	2,178	7,372	7,957
Total absolute WLC (incl. B6 and pre-demolition) (tCO_2e) *Module B7 not considered*	16,596	23,316	120,466	119,068

874. Regarding carbon, options 1 and 2 present substantially lower embodied and whole life cycle carbon figures as they deliver a significantly lower quantum of development. Option 1 has the lowest upfront emissions per square metre and absolute, as it proposes minimal levels of intervention, the highest level of retention and fewer new materials. This is followed by option 2 which would apply additional loading to the existing structure without any structural strengthening.

875. Option 3 incorporates retention of a significant portion of the existing building, which results in a slightly lower upfront and WLC carbon per square metre. However, due to significant overhead development proposed to maximise the development capacity of the site, the significant construction complexity and

inclusion of substantial transfer structures, it would result in a higher GIA and therefore the highest upfront and WLC emissions (in tonnes).

876. Option 4 maximises the development capacity of the site. The new build option provides an opportunity to optimise efficiency, providing a lower GIA and higher NIA, resulting in slightly less total carbon than option 3.

877. Note that these whole life carbon emissions provide initial assessment for comparison of options only. The figures differ to the submitted WLC Assessment which reflect a comprehensive progression of design and other optimisations.

878. Options 1 and 2 apply a NABERS 5* target which is aligned with whole building energy use intensity (EUI) of 115kWh/year/m2 NIA, this is due to the assumptions regarding the lower energy performance that is achievable through the existing structure. Options 3 and 4 are based on a NABERS 5.5* target which is aligned with an EUI of 90kWh/year/m2, this is achievable through the replacement of the MEP and Façade.

879. Regarding circular economy, options 1 and 2 retain would retain the complete existing structure. However, due to the retained massing, options 1 and 2 have a 25-40% greater form factor (façade area ratio to floor area) than options 3 and 4. This higher form factor would result in a façade replacement requiring more façade per unit of floor area, it also has a detrimental impact on the potential energy performance. Option 3 would retain the majority of the existing structure, however, because the existing building prevents a central core, significant strengthening works and a perimeter frame would be required. Additionally, the retained floors on option 3 would pose constraints on an efficient and consistent servicing strategy across the development. Option 4 would demolish the existing structure and therefore would result in the lowest level of retention. However, the new building would be designed for future adaptability and reuse, and provide potential for non-destructive disassembly in the future.

880. Regarding climate resilience, options 1 and 2 provide limited opportunities for additional greening and flood attenuation measures as the build footprints extends to the site boundary, and blue roofs are unlikely due to the existing structural capacity. Although a new façade would mitigate against overheating, the existing structure would still constrain the thermal performance of the building. Options 3 and 4 provide greater opportunity to incorporate greening on balconies, terraces and on top of the tower, including blue/green roofs to improve water attenuation. Options 3 and 4 have an opportunity to optimise the massing

of the tower and façade design to minimise solar gains and reduce the risk of overheating.

881. Regarding other social and economic opportunities, the retained areas in options 1, 2, and 3 would result in a highly constrained public realm experience. Additionally, there is limited opportunity to improve the presence of the lobby and create publicly accessible amenities within the building. Without the constraints of the existing building, option 4 could incorporate a public space at ground level with F&B provision and provide publicly accessible amenities within the building.

882. The existing core location and grid pattern results in small bay sizes and floor plate areas, which paired with very constrained floor to ceiling heights and limited opportunity to incorporate public and tenant facilities, including no potential to incorporate cycle storage, would result in poor quality office space and low commercial appeal for options 1 and 2. Option 3 could better improve the quality of office space on the newly constructed upper flowers, however the low quality office space at lower levels would need to be offset and there would still be limited potential to incorporate public and tenant amenities, including cycle storage. Option 4 provides an opportunity to deliver A-grade office space, the highest overall NIA, and the delivery of office densification aspirations.

883. The optioneering concludes that option 4 would be the preferred option, as the new build construction could deliver market leading, modern, high-performance office spaces with associated amenity facilities. The new build option would deliver the highest NIA and improve the public realm.

884. Key benefits justifying the full redevelopment option include:

- The existing building is not compliant with current structural and environmental standards.
- Delivers high quality office space that is flexible and unconstrained.
- Delivers a flexible ground floor level that is able to provide high quality public realm, retail and amenity facilities.
- A less complex construction programme and less total carbon compared to option 3.
- The redevelopment fulfils the development potential of the site in accordance with emerging tall building policy requirements in the eastern cluster. Delivers the highest NIA (+597%) of all options.
- The ability to design the most efficient structural system for the building and optimised services.

Development proposal

885. The development proposal is full demolition and redevelopment. According to the Pre-Demolition Audit (PDA), the existing building was not designed and constructed with deconstruction principles, however it identifies a spectrum of reuse scenarios for materials identified onsite.

886. The pre-demolition audit estimates a total of 12,793.1 tonnes of material would arise as result of the proposed demolition works. The predicted waste streams and their associated recycling rates are outlined in the table below.

887. *Summary of demolition waste generated*

Material	**Best-practice recycling rate (%)**	**Tonnes**	**% by weight**	**Recycled material (tonnes)**	**Material for disposal (tonnes)**
Concrete / binders	100	7,971.1	62.3	7,971.1	0
Steel	100	2,293.2	17.9	2,293.2	0
Bricks	100	1,178.9	9.2	1,178.9	0
Mixed metals	100	489.9	3.8	489.9	0
Glass	100	192.9	1.5	192.9	0
Wood / timber	100	183.6	1.4	174.4	9.2
Carpets / vinyl / flooring	95	177.2	1.4	168.3	8.9
Tiles & Ceramics	100	98.5	0.8	98.5	0
Gypsum	95	90.2	0.7	85.7	4.5
Asphalt	100	44	0.3	44	0
Insulation	95	35.6	0.3	33.9	1.8
Electricals and Electronics	90	25.4	0.2	22.8	2.5
Mixed	95	6.2	0.05	5.6	0.6
Mixed Plastics	95	6.3	0	6.0	0.3
Total		**12,793.1**	**100**	**12,765.3**	**27.8**

888. Elements identified as having the greatest potential for reuse offsite are fit-out materials such as:

- Raised access flooring (~33,650 panels). The number and uniformity could make them suitable for reuse on another project.
- Ceiling lights (~1,300 units). The number and uniformity could make them suitable for reuse on another project. However, the desire for more energy efficient LED lighting may limit reuse of some fixtures.

- Ceiling panels (~20,200) are in good condition and the uniformity of design could make them suitable for reuse on another project.
- Steel handrails (~1 tonne) are in good condition and there is a possibility of reusing them on another project.
- Glass partitioning (~230 panels). The number and uniformity could make them suitable for reuse on another project, however the storage and brokerage would require careful consideration.
- Internal doors (~530) doors) could be removed carefully and reused on another project.
- Kitchenettes (~60 cabinets, ~15 kitchen sinks) and sanitaryware (~85 toilets, ~85 basins). Careful removal could facilitate reuse on another project.

889. The audit identified the following Key Demolition Products (KDPs) that could have a potential reuse value:
- Bricks and blockwork (1,053 tonnes) found in the stair cores, facades and basement walls. Dependent on the demolition methodology, it could be possible to recover the façade brickwork. The brickwork that makes up the stair cores are mostly concealed by wall finishes, meaning the likelihood of reusability is limited as it would be difficult to clean and restore. Brickwork that is not reused would be crushed into secondary aggregate materials.
- Structural steel (1,146 tonnes) could be reused on other projects. Engagement with reused/reclaimed streel stock suppliers is required. The challenges with second-hand structural steel arise from the need for specific and unique specifications and sizes. Steel that is not reused would be segregated and recycled offsite.
- Stone façade cladding (14 tonnes) could be removed and reused on another project, if not damaged due to the adhesive. Cladding that is not reused could be crushed for terrazzo tiles.
- External timber fire doors (15 doors) and external glass doors (10 doors) could be reused on another project.

890. The audit has identified Globechain as a reuse marketplace that could be used to facilitate reuse on other projects, as well as other take-back schemes, potential brokers, and processors to ensure avenues for the highest value reuse and recycling are explored.

891. The Circular Economy Statement outlines the circular economy targets and commitments of the proposed development, most of which exceed the London Plan SI 7 policy targets:

- 99% of excavation waste materials diverted from landfill for beneficial use (exceeding GLA target of 95%).
- 99% of non-hazardous demolition waste materials diverted from landfill for reuse, recycling, recovery (exceeding GLA target of 95%).
- 99% of construction waste materials diverted from landfill from landfill for reuse, recycling, recovery (exceeding GLA target of 95%).
- 65% of municipal waste to be recycled by 2030 (aligned to GLA target of 65%)
- 30% of new building material elements to be compromised of recycled or reused content by value (exceeding GLA target of 20%).

892. Additionally, the project has committed to:
    - The development of a Resource Management Plan/Site Waste Management Plan to satisfy BREEAM Wst 01. Including a minimum resource efficiency benchmark of <11.1 tonnes/100m^2 (construction waste generation).
    - A recycling and reuse target of 90% of waste at construction stage.

893. These commitments and targets will be included in the Sustainability Employer's Requirements, and the principal contractor will be responsible for site monitoring and reporting against these targets.

894. The Circular Economy Statement outlines circular economy commitments and opportunities of the proposed development. Key proposals are set out below:

895. *Designing out waste*
    - Prefabricated façade design to minimise waste both offsite and onsite.
    - Minimising structural silicone and using carrier frames to avoid wet works throughout the life of the façade. Replacement of failed glazing is straightforward when applied to a carrier frame, as it can be unbolted as a complete entity and the glass resealed offsite in factory conditions.
    - Specification of standardised services components and equipment to allow easy maintenance and avoid replacement of entire plant.

896. *Designing for longevity*
    - Design with robust and durable materials and finishes.
    - Design for access and maintenance principles and create an access and maintenance strategy during design.
    - Specify appropriate protection to MEP services.

897. *Designing for future adaptability/flexibility*

- Standardisation of structural grid and façade modules.
- Designing flexible and futureproofed office space fit for various uses.

898. The proposed development would implement material passporting to collect, collate and store key data for new building materials and/or products. The requirement for data storage would be incorporated into the Employer's Requirements for the Principal Contractor.

899. Whilst it has been remonstrated the existing building cannot be re-used in-situ, the development proposal has identified reuse scenarios for existing materials and addresses circular economy principles, through design for longevity, adaptability and future disassembly.

Operational energy strategy and related emissions

900. The redevelopment has been designed in accordance with the principles outlined in Local Plan Policy DM 15.2 Energy and CO2 emissions assessments, and relevant provisions of the GLA London Plan Policy SI 2 Minimising greenhouse gas emissions and Policy SI 3 Energy Infrastructure and Policy SI 4 Managing Heating Risk.

Energy Performance

901. London Plan Policy SI 2 requires major development to be net zero-carbon, with minimum reductions in regulated emissions (i.e. those associated with heating, cooling, ventilation, hot-water and lighting) beyond Part L of the Building Regulations 2021. Minimum reductions for non-residential developments:
- 15% reduction through energy efficiency measures alone (Be Lean stage)
- 35% overall reduction

902. The GLA acknowledges in their Energy Assessment Guidance note (Nov 2022) that non-domestic buildings using heat pumps will find it challenging to achieve these targets as the baseline itself includes ASHPs.

903. The proposed energy strategy has identified the following carbon dioxide savings beyond Part L:

904. *Regulated carbon dioxide savings from each stage of the energy hierarchy*

	Tonnes CO_2 per annum	Stage emissions reduction	Stage percentage reduction

Baseline (Part L 2021)	273.8	-	-
Be Lean: Demand reduction	251.7	22.0	8
Be Clean: Decentralised energy	-	-	-
Be Green: Low/zero carbon technologies	240.2	11.6	4
Total reduction		33.6	12

905. The 12% reduction falls short of the GLA 35% target. Due to the proposed building's mix of uses, form, arrangement and design being highly unique, the energy efficient design cannot be considered appropriately in the Building Regulations Part L methodology. In addition, limitations of the Part L methodology arise from comparing the building's performance with a notional building performance, rather than the actual, modelled Energy Use Intensity (EUI).

906. The operational emissions are expected to result in 1,298 kg CO_2/m^2, which amount to 90,276 tonnes CO_2e over a 60-year period.

Energy Strategy
Be Lean:

907. The Be Lean stage focuses on reducing energy demand through design and construction measures. Proposed measures implemented:
- High-performance building fabric (including low u-value glazing) and low air permeability.
- Optimized façade design, and use of both Close Cavity Façade (CCF) and Single Skin Façade (SSF) systems to balance between daylight, solar gain control and beneficial solar gain in winter. Peak solar gains are limited to ~50W/m2 in line with BCO Guidance.
- Glazing ratios of 80% across different elevations, dependent on the orientation and overshadowing from adjacent building.
- The proposed CCF façade is designed with internal automated blinds that respond to the sun path and control solar gains while maximising natural daylight. A parametric energy model was employed to optimise façade performance targets.
- An Underfloor Air distribution (UFAD) system is proposed to both mechanically ventilate and cool the building. This would minimise high level mechanical services on office floors and maximises the use of free cooling.

- The design provides tenants the option to expose soffits on typical floorplates. Exposits soffits could reduce the peak cooling demand by absorbing excess heat.
- Mechanical ventilation with heat recovery system.
- High-efficacy LED lighting with efficient lighting controls to maximise the use of natural daylight and reduce artificial lighting loads.
- Variable speed drives/sensors on pumps/fans responding to variable building loads.
- Smart energy/building management systems and controls

908. The Design and Access Statement notes that further design studies are underway to potentially increase the amount of SSF to better balance the visual design intent, energy performance and embodied carbon footprint of the facades. A condition is included which requires an assessment of the façade systems is undertaken and submitted at the next stage of design.

909. The proposed energy demand reduction strategy ('be lean') is estimated to achieve an emissions reduction of 8% compared to Part L 2021, falling short of the GLA target of 15%.

Be Clean:

910. There are currently no existing district heat networks (DHN) in the area that the proposed development can connect to. There is a proposed future heat network which provides a potential future point of connection. The applicant has provided a commitment that a future connection to a district heating network will be provided in the basement of the proposed development. Drawings have been provided demonstrating space for heat exchangers in the energy centre/centres. A drawing should also be provided showing a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors. This requirement is to be secured by condition.

Be Green:

911. The Be Green stage focuses on incorporating renewable energy technologies. An all-electric building (except emergency generator) is proposed. Main features for the scheme include:

- Highly efficient Air source heat pump (ASHP) system. It is anticipated that thermal energy storage will be utilised for hot water serving the end of trip facilities.
- The development includes ~72m2 of photovoltaics (PVs), located on the roof, providing an estimated yield of 13 MWh per annum. Roof area for PV is limited due to competing needs of plant and space for urban greening. Area available for PV will be reassessed at each design stage to explore whether more roof space can be used for PV.

912. A life safety and essential generator will be installed at roof level on day one, with space provision for two back-up generators in the future (by tenants).

913. A 4% reduction in carbon emissions is achieved under 'Be Green' stage.

Overall Target

914. The development proposal would achieve a 12% reduction in regulated CO2 emissions overall, representing a shortfall against the London Plan requirements. This is a high level of emissions reduction for an office building. The efficiency improvements and carbon emissions reductions as demonstrated in the submitted Energy Statement are considered policy compliant.

Cooling Hierarchy

915. In accordance with the London Plan Policy SI4 (Managing Heat Risk), the development follows the cooling hierarchy to reduce overheating risk and minimise the need for active cooling:

916. Minimising internal heat generation:
- Encourage tenants to consider IT equipment installations that would achieve lower energy configurations and capture heat gains at the source.
- Strategically designed MEP systems to minimise heat losses from pipework, fans, pumps.

917. Reducing heat entering the building:
- High-performance building fabric (including low u-value glazing) and low air permeability.
- Energy modelling was conducted to optimise façade design to control solar gain. The proposed CCF façade is designed with internal automated blinds that respond to the sun path and control solar gain.

918. Managing heat within the building

- The design provides tenants the option to expose soffits on typical floorplates. Exposits soffits could reduce the peak cooling demand by absorbing excess heat.

919. Passive / mixed mode ventilation

- Passive ventilation is not proposed due to noise and air pollution, as well as higher wind pressures on upper floors. This strategy may be revised as the design develops and is conditioned.

920. Mechanical Ventilation

- Mechanical Ventilation has been optimised for air-side free cooling. Fresh air flowrates would reduce the energy consumption of active cooling systems.

921. Active cooling (low carbon):

- The mechanical cooling system will comprise of high efficiency Air Cooled Chillers (ACCs) and Air Source Heat Pumps (ASHPs) serving a chilled water system.

922. The cooling strategy demonstrates compliance with the London Plan's cooling hierarchy, prioritising passive measures and energy-efficient solutions to mitigate overheating risks and reduce reliance on active cooling systems. The approach ensures that the development is designed to adapt to rising temperatures while minimising energy consumption and carbon emissions.

EUI:

923. The adopted GLA Energy Assessment Guidance (2022) requires developments to calculate Energy Use Intensity (EUI) - a measure of a building's total annual energy consumption including regulated and unregulated energy - as well as the space heating demand. For offices, the GLA benchmarks are set at 55 kWh/m^2(GIA)/year for EUI and 15 kWh/m2(GIA)/year for space heating demand. The UK Net Zero Carbon Buildings Standard (UKNZCBS) sets an EUI limit of 83kWh/m2/yr for new build offices starting on site in 2026.

924. The predicted EUI of the development is 72.88 (kWh/m2/year) (excluding renewable energy) which falls short of the GLA target, but would meet the UKNZCBS EUI limit. The predicted space heating demand for the development is 6.22 (kWh/m2/year) which meets GLA target.

NABERS UK

925. The project is employing a NABERS Design for Performance (DfP) approach to optimise whole building operational energy performance. The proposed development is targeting a 5* rating or higher. A comprehensive DfP assessment will be carried out in the next design stage.

Conclusion for Operational energy performance

926. The building is optimised for energy efficiency balancing daylight and overheating, thermal mass, and using energy efficient and low carbon building systems. Due to the nature of the form, arrangement and design of the tall building being highly unique, the energy efficient design cannot be considered appropriately in the Building Regulations Part L methodology. The development is considered to meet the intentions London Plan Policy SI 2, Local Plan CS15 and emerging City Plan policy S8.

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

Whole Lifecycle carbon:

928. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as their embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the

longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon carbon target.

Development proposal

929. The applicant has submitted a compliant Whole Life Carbon Assessment following RICS V1 guidance. The WLC Assessment has been third party reviewed. The results are set out in the table below, against the GLA benchmarks. Total WLC emissions of the proposed development over a 60-year period are estimated to be 199,535 tCO2e (2,869 kgCO2e/m2 GIA) (inc. B6-B7, and sequestration). Operational carbon (B6-B7) accounts for 45%, lifecycle embodied carbon 55%, and upfront embodied carbon (A1-A5) 36% of total WLC emissions.

930. *RICS 1 whole life-cycle carbon emission results (non-decarbonised)*

Floor Area = 69,553m^2 GIA		Carbon Intensity (kgCO2e/m2GIA)		
Stages	Life-cycle Carbon Emissions (tCO2e)	Development proposal	GLA standard benchmark	GLA aspirational benchmark
Upfront Embodied carbon (A1-A5)	71,522	1,028	950	600
In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7)	37,738	543	450	370
In-use Operational carbon (B6-B7)	90,276	1,298	-	-
Life-cycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	109,259	1,571	1400	970
Whole life-cycle carbon (A-C, incl. B6-B7 inc. sequestration)	199,535	2,869	-	-

931. The GLA Guidance requires applicants to use the version 1 methodology developed by RICS (Royal Institution of Chartered Surveyors) to complete a whole life-cycle carbon assessment. RICS have published the 2nd edition which came into full effect on 1 July 2024. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicant has

additionally provided carbon modelling results and complementary analysis, and interpretation aligned with RICS V2 which is considered more comprehensive and up-to-date than RICS V1, with improvements from several years of industry practice. The RICS V2 results enable the project to understand, manage and improve its carbon footprint through the design process. The RICS V2 figures are provided for additional information only.

932. *RICS 2 whole life-cycle carbon emission results (non-decarbonised)*

Floor Area = 69,553m^2 GIA		Carbon Intensity (kgCO2e/m2GIA)		
Stages	Life-cycle Carbon Emissions (tCO2e)	Development proposal	GLA standard benchmark	GLA aspirational benchmark
Upfront Embodied carbon (A1-A5)	84,721	1,218	950	600
In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7)	43,365	623	450	370
In-use Operational carbon (B6-B7)	90,276	1,298	-	-
Life-cycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	128,086	1,842	1400	970
Whole life-cycle carbon (A-C, incl. B6-B7 inc. sequestration)	218,361	3,139	-	-

933. Key aspects of the design which support material and carbon efficiency include:
- Replacing the diaphragm wall in the substructure with a secant pile wall which would reduce the volume of concrete and rebar used.
- Specification of low carbon materials
  - Low carbon aluminium in the façade
  - 40% improvement on rolled open sections
  - 40% improvement in rebar carbon factor
  - Improvement in concrete carbon factor in substructure
  - Low carbon raised access floors
- Ensuring contracts commit to low use of carbon/electric plant.

934. However, the scale and nature of the proposed development that have influenced slightly higher WLC results than the GLA benchmarks. This is to be expected regarding the upfront carbon emissions of a tower structure. The following considerations are outlined as justification for this:
    - A multi-storey basement is required to accommodate the plant required for servicing a tower and significant onsite cycle parking requirements. This is of particular concern as basement construction results in high embodied carbon emissions including from transport, pollution, is highly disruptive in terms of noise and traffic and extends the construction programme. Various options have been assessed to reduce the basement size and further reduction opportunities will be explored during future design stages.
    - The site constraints influenced a building shape with a challenging façade to floor ratio of 0.44. The proposed building shape is required to provide wider benefits such as an improved public realm interface and designing an accessible public realm in context of a complex ground floor structure and levels.
    - The impact of taller building and structural strengthening to support additional weight, stability against more significant winds, and additional fire safety measures.

935. Further carbon reduction opportunities identified for exploration during the design development phase, include:
    - Changing the structural floor plate strategy, from concrete on metal deck, to precast planks.
    - A precast floor would be more conducive to an exposed ceiling. Therefore, a metal-based suspended ceiling system could be omitted, minimising ceiling finishes.
    - Optimisation of the steel framing to achieve an assumed 10% reduction in steel tonnage in the frame.
    - Improvement in concrete carbon factor and reduction of rebar tonnage in the superstructure.
    - Optimisation of core sizing subject to wind tunnel testing.
    - Improvements to façade design and materials, including use of further ultra low carbon aluminium (e.g. Hydro CIRCAL 75) and use of low carbon glass, and optimisation of the façade framing and façade blind depth.
    - Reducing the length of some secant piles and reducing pile and raft volumes, subject to site investigations.
    - Using reused steel for steel propping (temporary steel) in the basement.
    - Using low carbon materials for public realm works.

936. The façade system is reported to generate 12,485 tCO2e in upfront carbon (A1-A5) and 17,473 tCO2e in whole life-cycle carbon (A-C). It is the third most carbon intensive building element, after building services and the structural frame. The report notes that the highest contributing material in the most typical façade systems is the frame:
- In a CCF Frame, the frame contributes 46% of upfront carbon.
- In a Single Skin Façade (SSF), the frame contributes 36% of upfront carbon.
- In a CCF cranked Frame, the frame contributes 55% of upfront carbon.

937. A detailed design stage whole life-cycle carbon assessment and a confirmation of the post construction results are required by conditions.

BREEAM

938. The office spaces will be assessed under BREEAM UK New Construction V6 as a shell and core (office) project. The proposed development commits to achieving a BREEAM 'excellent' rating with a targeted score of 81%. The pre-assessment scorecard identifies a number of potential credits that the proposed development could achieve to achieve an 'outstanding' rating.

939. The office area is on track to achieve a high number of credits in all of the CoL's priority areas; Energy, Materials, Water, Waste and Pollution.

940. The Wst 05 credit – Adaptation to Climate Change is targeted as required by the Local Plan.

941. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2040 Policy DE1. A post-construction BREEAM assessment is requested by condition.

Urban greening and biodiversity:

Urban Greening

942. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of development designs. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Local Plan Policy CS19 and Emerging City Plan 2040 policy OS2 (City Greening) mirror these requirements and requires the highest levels of greening in line with good design and site context.

943. The landscaping proposal integrates a ‘green spiral concept’ delivered through layered greening across the height of the building, in the form of terraces, linear balconies, vertical greening.

944. The landscaping proposal includes:

- Public realm: two trees are proposed to extend the tree planting from 120 Fenchurch Street, following the same spacing and species. Note two existing trees along Fen Court would be affected by the development, this is considered in the arboricultural section. A small area of additional planting (approx.5m^2) would be provided as an extension to Fen Court where the building façade creates additional space.
- Public terraces: two double height public terraces are proposed on levels 17 and 20. The Level 17 terrace would be directly opposite the gardens at 120 Fenchurch Street and connect to the level 20 public terrace with linear terraces on levels 18 and 19 on the southern elevation. The two public terraces would have varied soiled depths ranging from 600 – 900mm to support substantial plant growth. The proposed planting takes into consideration light conditions, with more shade tolerant plants positioned deeper into the terraces. Evergreen tree species would be positioned to the edges of the building to aid in deterrence and wind break and multi-stem tree varieties are positioned to allow views from the terraces. Climbing plants would be positioned on supporting columns to create green wall habitats.
- Linear terraces: a series of shallow linear terraces are proposed across levels 6 – 20, 22-25, and 27-30 to provide greening across various levels and elevations of the façade, a cascading effect across the building as well as amenity space for tenants. The proposed planting across the terraces would be similar and include a combination of evergreen shrubs, herbaceous flowering perennials and trailing plants. The level 18 and 19 linear terraces would be double height to include trees and create a connection between the public terraces.
- Roof terraces: a series of roof terraces from levels 28-31 are proposed to provide a ‘green cascade’ across the roofs. Low growing ground cover planting would include flowering perennials and small shrubs. Raised planters would includer larger species and trees.
- Biodiverse green roof: on the main roof area at level 32 with a total area of 256m^2. The planting strategy includes a mix of wildflowers of native species suitable for local climatic and shade conditions.

945. The ‘public terraces’, ‘linear terraces’ and ‘roof terraces’ do not meet the criteria for ‘biodiverse’ or ‘intensive’ green roofs, and thus are classified as ‘other’ green roof habitat.

946. The landscaping proposal covering an area of 987.2m^2 achieves an Urban Greening Factor of 0.321 which meets London Plan Policy G5 target of 0.3 for office developments.

Biodiversity

947. Policy OS4 of the emerging City Plan 2040 sets out Biodiversity Net Gain (BNG) requirements for major developments. Due to the City’s highly urban nature, the statutory 10% BNG is not an appropriate mechanism for delivering meaningful biodiversity improvements in the Square Mile. Instead, the City Plan sets a minimum target of three biodiversity units per hectare (3BU/ha).

948. The proposed greening interventions would align with the City of London’s’ Biodiversity Action Plan (BAP) through the provision of different habitats. The ecological appraisal recommends that appropriate that the following habit aids are incorporated into the development:

949. Bird nesting boxes (2x house sparrow terrace, 1x triple cavity swift nest, 3x generic species nest box).

950. Invertebrate habitats (6x artificial nesting aids, including log/stone piles within the biodiverse roof and insect nests within the landscape planting across the building and street level)

951. The provision of targeted nesting aids will support priority species in the BAP such as house sparrows, black redstarts, swifts, and wild bees.

952. According to the baseline assessment the site baseline is 0.00 biodiversity units. The proposed measure would deliver an increase of 0.89 habitat units, representing a post-development biodiversity value of 3.99 BU/ha. The unit increase satisfies the statutory requirement of 10% BNG and the emerging City Plan target of 3 BU/ha.

953. In accordance with the NPPF, local policy drivers and recent legislative changes, proposals are expected to provide measurable net gains in biodiversity. These should aspire to a minimum of 10% net gain in biodiversity which should be evidenced through the submission. Applications should aim to quantify the

predicted change in ecological value of the site in light of the proposed developments to assess compliance against local and national policy. The BNG mandate set out in the Environment Act 2021, states that a target of 10% net gain in biodiversity should be reached, and biodiversity value maximised on site.

954. The submitted documents and BNG Metric detail how the site has a baseline is 0.00 biodiversity units. The proposal would therefore fall under the 'de minimis' threshold and as such exemption from national requirements. Officers note that the proposals include the removal of the tree within the highways however this falls outside of the redline and as such outside of the baseline calculations. The removal of this would be conducted under separate legislation (s278 of the Highways Act) which would therefore fall outside of the BNG requirements under this application. Notwithstanding this Officers are cognisant the proposal would provide a significant amount of greening both on the proposed building in terraces and upper levels but also with the addition of two street trees as mitigation. The proposal is therefore considered to be acceptable in this sense.

Arboricultural Impact

955. Policy DM19.2 (Biodiversity and urban greening) of the Local Plan 2015 states that developments should promote biodiversity and contribute to urban greening by incorporating green roofs and walls, soft landscaping and trees. The supporting text goes on to state existing trees should be replaced with trees of an equivalent size and quality.

956. The application has been submitted with an Arboricultural Development Statement and Tree Survey.

957. The submitted documentation summarises that there are no trees within the application site. There are however seven trees within the surrounds that have the potential to be impacted upon. Of these 6 of the trees (2 x Cat A, 2 x Cat B and 2 x Cat C) would be retained and protected by a scheme of works during construction. One Elm Tree (Cat C) would however need to removed to allow fire tender access to the property.

958. This tree is located on the southern side of Fen Court, adjacent the junction with Fenchurch Street. While the removal of this tree is regrettable, the documentation state that this is required to provide suitable fire tender access to the property. Fire Regulations require set travel distances from Fire-Fighting Vehicle access and given the restricted access from the north (due to the Fen Court Garden) space is require to ensure any vehicle can access both the

eastern side and northern side of the proposed building. If the tree remained in situ, the fire vehicle access would be non-compliant with regulations given the distance from the parking position to the mustering point.

959. To offset the removal of this Cat C tree, two replacement trees would be planted on Fenchurch Street. These two trees (Alnus x spaethii) would be planted with a girth of 35-40cm (similar to the existing tree) and will be within a root cell system as per the Landscape General Arrangement Plans. Further soft landscaping at various levels of the build is also proposed which significantly mitigate against this loss.

960. Officers note that the removal of this would be conducted under separate legislation (s278 of the Highways Act) and therefore the submitted documentation represents a worst-case scenario. Any works under this legislation would still need to be consulted on and the final design sought. Therefore there is still scope for the retention of this tree.

961. The proposal is therefore considered acceptable on this basis and compliant with Policy DM19.2 (Biodiversity and urban greening) of the Local Plan 2015.

Urban Greening and Biodiversity Conclusion

962. The proposal meets or exceeds London Plan Policies G1 Green infrastructure, G5 Urban greening G6 Biodiversity and access to nature. Local Plan Policy CS19 Open Spaces and Recreation and emerging City Plan Strategic Policy S14 Open Spaces & Green Infrastructure.

Climate Resilience

Overheating

963. The proposed development has been assessed for overheating risk under the CISBE TM42 methodology. Both credits under BREEAM Hea 04 are targeted.

964. The proposed building design integrates measures to manage solar gains, such as a Closed Cavity Façade (CCF) system, balconies and terraces that provide passive solar shading. An enhanced building envelope would improve thermal performance and minimise the risk of summertime overheating. A free cooling displacement ventilation system is used to satisfy internal cooling demands, and it is designed to operate in high temperatures.

Urban Heat Island

965. In line with Policy G5 of the Local Plan and Policy CR1 of the emerging City Plan, the building has been designed to minimise contributions to the urban heat island effect as far as possible, by integrating vegetation and greening across the development. Two new street trees are proposed which would provide shading and cooling to Fenchurch Street.

Flooding

966. The Flood Risk Assessment concluded the site is at low risk of flooding from all sources. A Sustainable Drainage System (SuDS) details the development's drainage strategy, which includes a possible blue roof above the building plantroom, green / biodiverse roofs on the roof terraces, rainwater harvesting and attenuation tanks.

967. Surface water will be restricted to 2 l/s, providing a 96% betterment over existing rates.

968. The proposal complies with London Plan policy SI13, Local Plan policy CS18 and emerging City Plan 2040 policy S15.

Water Stress

969. Water conservation and efficiency is a key priority of the proposed development. All fixtures and fittings would be selected to meet or exceed BREEAM water efficiency standards. A water storage tank is proposed which could provide 50% of a full day of freshwater storage. The proposed planting scheme includes drought tolerant plant species and automatic, sensor driven irrigation systems are proposed for all planting areas to reduce water demand. Further rainwater and greywater recovery systems are being considered to further reduce freshwater demand.

Biodiversity

970. The proposed planting scheme would deliver a 'green spiral concept' through layered greening across linear terraces, roof terraces and vertical greening. A biodiverse green roof at level 32 would be sown with UK provenance wildflower seed and native annual species. The planting scheme would be supported by habitat enhancements such as integrated bird boxes and invertebrate habitats to further support biodiversity.

Pests and Diseases

971. The proposed development has demonstrated consideration of the risks and mitigation measures to prevent pests and diseases. Consideration has been given to the use of non-native species within the proposed planting palettes and using reputable sources for imported plant stock which include inspections. Air intake and exhaust louvers, vent pipes and drainage outfall would be provided with bird mesh to prevent animal ingress. The proposed ventilation system is designed to provide fresh air rates that comply or exceed BCO guidance and limit the spread of airborne viruses. The underfloor ventilation system would provide higher air quality than a high-level mixed system.

Food, trade and infrastructure

972. A consideration of durability and ability to withstand impacts such as increased rainfall, wind speeds and temperature fluctuations has informed the selection of the proposed materials and construction methods.

973. The development would be car-free with one blue-badge space, and cycle parking and end of trip facilities would be provided. An off-site freight consolidation strategy would reduce deliveries by 75%, with a future target of 90%.

Climate Resilience Conclusion

974. The proposed development has directly considered the six City of London climate risks and carried out a climate risk assessment in line with BREEAM Wst 05. The proposed development is compliant with Local Plan Policy DM 15.5, emerging City Plan 2040 Strategic Policy S15, policies CR1 and CR2. A post completion update to the Climate Change Resilience Sustainability Statement is secured by condition.

Conclusion

975. The proposed development effectively integrates principles of sustainability and adheres to the policy objectives outlined in the Greater London Authority's (GLA) London Plan, the City Corporation's Local Plan 2015, emerging City Plan 2040 and Climate Action Strategy.

976. The proposed development would optimise the quantity and quality floorspace for offices, provide a mix of community and retail uses with an enhanced public realm and range of urban greening measures, thus contributing a range of environmental, social and economic sustainability benefits to the Square Mile into the future.

977. The optioneering highlighted various challenges that justify why retention and retrofit of the existing building is highly constrained. The proposed redevelopment option fulfils the development potential of the site, designed to the most efficient structural system, delivering high quality office floor space that is flexible and would meet current structural and environmental standards. The proposed design adheres to circular design principles including designing out waste, designing for longevity and designing for adaptability and flexibility.

978. The embodied and whole life-cycle carbon emissions can be reduced to a level close to the GLA's Standard benchmarks and a number of further carbon reduction opportunities will be further explored through design development. Further reporting of whole life-cycle carbon emissions is secured by condition.

979. The energy strategy has been optimised for the site, with the incorporation of a high-performance building fabric and optimised façade design, and highly efficient mechanical and ventilation services. The development is targeting a challenging NABERS UK rating of 5 stars and a BREEAM 'Excellent' rating for the office areas. The proposal falls short of meeting the London Plan target of 35% operational carbon emission savings beyond Part L 2021, however, the GLA acknowledges this target is a challenge for non-residential buildings. Offset payments will be made to mitigate the shortfall to reach the net zero carbon target. The proposed development therefore is in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1.

980. The building design responds well to climate change resilience by minimising overheating risk, integrating flood mitigation measures and water efficiency measures, and considering risks regarding pests, diseases and wider infrastructure. The proposal incorporates high levels of urban greening and biodiversity, thereby complying with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

981. London Plan Policy D11 (Safety, security and resilience to emergency) states that development should include measures to design out crime that – in proportion to the risk – defer terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and wider area.

982. Local Plan Policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism.

983. Local Plan Policy DM3.2 (Security measures in new developments and around existing buildings) seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 (Crowded places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to nighttime uses.

984. Emerging Strategic Policy S2 of the draft City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, stakeholders to ensure that it is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism by ensuring that that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.

985. The security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the City of London Police at pre-application stage, application stage. The submission sets out the security proposals to protect the building and its users. To inform these security proposals the Applicant has undertaken a Security Needs Assessment (SNA), a Threat, vulnerability and risk assessment (TVRA) and a Vehicle dynamics assessment (VDA) in consultation with the Counter Terrorism Security Adviser (CTSA) within the City of London Police (CoLP).

986. The security strategy provisions for the development include the following elements:

- External lighting in the areas accessible to the public and through routes being adequate to support CCTV and natural surveillance by the estate management team, the public and employees.

- All planned publicly accessible spaces are looked over, such as the main office lobby, adjacent walkways and the entrance to the cultural/public terrace, to reduce the likelihood of crime and promote a sense of safety.
- Additionally, entrance or exit points (including those recessed into the façade) will also be afforded good levels of natural surveillance.
- Ownership is promoted using wayfinding and clear surface finishes to promote private and public areas.
- Secure bicycle parking located at Basement level(s) with electronic access control system and video surveillance.
- Clearly designated approach, thoroughfares and circulation routes.
- Deployment of electronic access control at points of entry and transition to permit/deny authorised access, including destination control lifts.
- Allow for additional layered security to be incorporated into the entrance for the Cultural/Viewing Gallery, should it be required on an event-by-event basis.
- A Hostile Vehicle Mitigation strategy incorporating vehicle security barriers to protect areas where in the building footprint where people may congregate. These include protection of the loading bay which would be used by visitors queuing to enter the cultural space reception area.
- Incorporation of measures which are deemed proportionate to resist or minimise structural damage arising from a malicious road vehicle impact. This is achieved through combination of Hostile Vehicle Mitigation measures at designated locations; and localised structural hardening.
- Manual bag search and metal detector wands to be employed in the ground floor reception to screen visitors to the cultural space. The reception area is designed to accommodate metal detection arches and X-ray bag screening equipment if required by a future tenants.
- Operators will have the ability to quickly restrict access to the building through physical measures in response to an external threat. The aim of dynamic lockdown is to prevent people moving into danger areas and preventing or frustrating the attackers accessing the building (or part of the building).
- A defence in depth approach is used to create a defined series of security zones which follow a clear logical hierarchy and will be enforced through a combination of electronic access control, territorial reinforcement and clear delineation of areas. Access to defined zones will be based on the concept of permissible use in that users will only be allowed to access if they have appropriate authorisation to do so. T

987. The City Police have been consulted on the submission and have provided a number of comments and advice to the applicant at pre-application stage. This includes ensuring there is sufficient access controls, HVM review and adequate CCTV installation.

988. Various security strategies have been produced as noted above, and these served as the baseline for design and follows a best practice methodology aligned to the NPSA guidance. This demonstrates a clear commitment to ensuring security as a priority in the development of the proposals detailed design.

989. It is recommended to secure full details of security measures by condition and within the various management plans which would be secured in the Section 106, which would be assessed in consultation with the City Police Design out Crime and Counter Terrorism teams. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan Policy D11, Local Plan 2015 policies DM3.2, DM3.3 and DM3.5.

Suicide Prevention

990. Policy DM3.2 'Security measures in new development and around existing buildings' aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. Policy DE4 of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling. Building Regulation K2 states the following: K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, Shall be provided with barriers where it is necessary to protect people in or about a building from falling.

991. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS6180: Barriers in and around buildings.

992. The proposed security and prevention measures to protect the building's users have been developed in consultation with the Senior Public Health Practitioner at both pre-application stage and application stage. Furthermore, amended plans

have been received during the planning process in correspondence with Officers and the Senior Public Health Practitioner is fully satisfied with the proposals.

993. Given the nature of the tall building proposed the development would include both public and private (office) terraces are various levels and heights throughout the building.

Public Terraces

994. The publicly accessible areas at upper levels within the building would be located at Level 17 and 20 (Cultural Use and Viewing Gallery). Both public elements proposed to include external, double height terraces that can be accessed via the internal areas. Following discussion with Officers, it is proposed to encase both these external terraces with a 2.8m high glass balustrade which would exceed the guidance laid out within the Planning Advice Note (2022) which is welcomed by the Senior Public Health Practitioner.

Private Terraces (Office)

995. The remaining office terraces consist of two main elements; the smaller terraces that continuously perforate the main body of the tower and the larger rooftop amenity spaces.

996. The smaller office terraces, while not publicly accessible can still present a risk and therefore to that end a 1.4m balustrade is proposed consisting of a metal finished planter (with planning on the external side of the balustrade) and a vertical mesh supported by posts. This provision of a suitable balustrade with the added potential for hostile planting is both compliant with the principles within the Planning Advice Note (2022) and welcomed by the Senior Public Health Practitioner.

997. Equally, the stepped rooftop amenity spaces (Level 28-31) have been designed with safety in mind. Where there is the possibility of glazed balustrades being located directly adjacent external elevations these have been increased to 1.8m in height with all adjacent fixed planters being pulled back from the balustrade. Again, this is both compliant with the principles within the Planning Advice Note and welcomed by the Senior Public Health Practitioner.

998. The proposal would provide safety measures above that required by Approved Document K and furthermore would be compliant with the principles within the Planning Advice Note. The Senior Public Health Practitioner is satisfied with the

proposals, and any approval would be subject to a recommended condition that would secure the final details of prevention measures (including such use of CCTV, lighting and planting).

999. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the draft City Plan 2040.

Health Impact Assessment

1000. Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

1001. Policy GG3D of the London Plan states that "to improve Londoners' health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments".

1002. The application is accompanied by a Health Impact Assessment (HIA) (produced by Arup) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health impacts.

1003. The HIA is based on known links between health determinants and health outcomes. The methodology has informed by the Institute of Environmental Management and Assessment's (IEMA) guidance on Determining Significance for Human Health in EIA (2022). Key principles of the IEMA guidance include assessing effects on health at population level, as opposed to individual level, and consideration of effects on health inequalities and vulnerable groups. Changes in health determinants are defined as positive, negative or neutral with a low, moderate, or high magnitude of change. Furthermore, the performance of the proposed development against the health themes and issues included in the CoL Health Impact Assessment Checklist has been considered.

1004. The baseline, in terms of demographics (including density, age, ethnicity, deprivation, health and wellbeing, education and employment), environmental aspects (including air quality, green spaces, noise and townscape) and vulnerable groups (including such as people with existing health problems or

disabilities, people who are homeless, people living in poverty, older people and children) have been assessed to understand the existing situation in the area. In terms of the future baseline, it is noted that rate of growth in the area is expected to be reduced materially.

1005. To assess the health impacts of the proposed development, seven main categories have been considered. These and their impacts in terms of magnitude and sensitivity are Engagement, Active Lifestyles, Healthy environment and design, Healthy workplaces, Healthy housing, Safe and vibrant neighbourhoods and Access to work and training.

1006. The submitted HIA concludes that the proposed development is likely to have an overall positive impact on health, highlighting the positive health impacts specifically related to

- The proposed development would increase the availability and quality of public space and green space.
- The proposed development would substantially improve the accessibility of the site, both in internal areas and the public realm.
- The proposed development would, once operational, improve environmental amenity in the area through provision of green infrastructure and high-quality design, and through control of air, acoustic and thermal conditions
- The proposed development would improve climate resilience in internal spaces and in the public realm, reducing the negative health effects of extreme weather conditions on workers and visitors to the site.
- The proposed development would have a permanent, moderate, positive effect on the health and wellbeing of workers and visitors.
- The proposed development would improve community safety in internal spaces and in the public realm, reducing the negative health effects of crime and of negative perceptions of safety on workers and visitors to the site.
- The proposed development would provide increased opportunities for employment and educational experiences in the local area.

1007. In light of the above, it is considered that the impacts of the development on health and wellbeing are largely positive. In order to achieve further health benefits, it is recommended that the proposed development should implement a Local Procurement and Local Training, Skills and Job Brokerage strategy, a strategy of Public Toilet provision and Community Engagement Strategy for the Cultural Use. These would be alongside the imposition of a condition requiring a

Construction and Environmental Management Plan, reference elsewhere in this report, and as recommended by the submitted Health Impact Assessment.

1008. Potential impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.

1009. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and draft City Plan 2040 Policy HL9.

Fire Statement

1010. Policy D12 of the London Plan (2021) states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Policy D5 (Inclusive Design) goes on to require proposals to be designed to incorporate safe and dignified emergency evacuation for all building users.

1011. A Fire Statement has been submitted outlining the fire safety objectives and strategy for the building. The submitted Fire Statement confirms that the building would be provided with the following key fire safety design features:

- The proposed development would increase the availability and quality of public space and green space.
- A steel frame structure with precast concrete planks achieving 120 minutes fire resistance.
- Compartment floors achieving 120 minutes fire resistance.
- Compartmentation strategy to protect areas such as stairs, lobbies, lifts and risers – as well as the separation of higher-fire risk areas such as plant rooms and UKPN accommodation.
- Sprinkler protection in accordance with BS EN 12845 (2015 + A1:2019).
- A Category L1 automatic fire detection and voice alarm system in accordance with BS 5839.
- A phased evacuation strategy.
- At least two escape stairs from each occupied level, as well as evacuation lifts for occupants who cannot use stairs to self-evacuate.
- Except for the external/internal plant at roof level, there would be fire-fighting access and facilities to all levels, via two fire-fighting shafts (each consisting of a fire-fighting stair, fire-fighting lift, and a fire-fighting lobby provided with a wet riser). Each fire-fighting shaft shall be provided with a pressure differential system in accordance with BS EN 12101-6 and BS EN 12101-13.

- Vehicle access provided to both fire-fighting shafts and a Fire Control Centre located at Ground Floor.
- Mechanical smoke ventilation provided to the basement levels.
- Non-combustible materials on the façade.
- Suitable fire safety measures to address the risk of external fire spread to neighbouring buildings.

1012. The City District Surveyor's office has reviewed the submitted statement and has confirmed that this in accordance with Policies D5 and D12 of the London Plan. The Fire Statement is therefore acceptable for the planning stage and would be secured by condition.

Planning Obligations and Community Infrastructure Levy

1013. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposals would also require payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1014. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City Corporation.

1015. The proposed development is a phased application. Regulation 8(3a) of the Community Infrastructure Levy (Amendment) Regulations 2014 allows for each phase of the development to be treated as a separate chargeable development for levy purposes. In this instance, the applicant proposes phases which would mean Mayoral and City CIL would only be payable upon implementation of construction above ground, as the earlier phases would not create any additional floor space.

1016. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy Regulations 2010 (as amended).

1017. CIL contributions and City of London planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£9,298,053	£8,926,131	£371,922

City CIL

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£4,169,708	£3,961,222	£208,485

S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
Affordable Housing	£2,779,805	£2,752,007	£27,798
Local, Training, Skills and Job Brokerage	£1,667,883	£1,651,204	£16,679
Carbon Offset Contribution (*as designed*) *Not indexed*	£684,570	£684,570	£0
Section 278 (Evaluation and Design Fee) *Not indexed*	£100,000	£100,000	£0
Eastern City Cluster Security Measures Contribution	£555,961	£550,401	£5,560
S106 Monitoring Contribution	£5,250	-	£5,250
Total liability in accordance with the City of London's policies	£5,793,469	£5,738,183	£55,286

1018. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are "in principle" and necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy. The details of the obligations are to be subject to negotiations with the applicant.

1019. **Heads of Terms**

- Affordable Housing
    - *Contribution to be paid upon Implementation*
- Highway Reparation and other Highways Obligations *(Highways Schedule of Condition Survey, site access, consents, licences etc)*
    - *No later than prior to first preparatory operations.*
- Local Procurement Strategy
    - *No later than prior to commencement*
- Local Training, Skills and Job Brokerage (*Demolition / Construction*)
    - *Contribution to be paid upon Implementation*
    - *Demolition submission: no later than prior to commencement.*
    - *Construction submission: no later than prior to implementation.*
- Delivery and Servicing Management Plan (*including Consolidation*)
    - *Submission no later than three months prior to occupation*
    - *Servicing to be restricted to between the hours of 2300 on one day and 0700 on the following day.*
    - *A cap of 99 two-way trips per day by vehicles no longer than 8 metres in length*
- Travel Plan (including Cycling Promotion Plan)
    - *Submission no later than six months prior to anticipated occupation*
- Accessible Car Park Management Plan
    - *Submission no later than three months prior to anticipated occupation*

- Construction Monitoring Costs (for Environmental Health)
    - *£53,820 upon commencement of the development*
    - *£46,460 upon each anniversary of commencement of the development until practical completion*
- Legible London Contribution
    - *£45,460 due on or before implementation.*
- Carbon Offsetting
    - *Submission of energy performance information prior to Completion, payment (if applicable) to be paid before Occupation*
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (*CoL*)
    - *Payment of the S278 Evaluation and Design Fee upon Commencement*
- Provision of Public Route between Fen Court and Cullum Street
    - (*Specification, Public Access & Management Plan*)
- Provision of Viewing Gallery (including terraces and associated internal spaces), to include but not limited to the following provisions:
    - *Provision of the Viewing Gallery no later than upon occupation of the development*
    - *Submission of Viewing Gallery Management Plan including confirmation of the viewing gallery operator*
    - *Free of charge daily public access to the whole of the Viewing Gallery between the hours of 10:00 and 19:00 or nautical dusk, whichever is later, excluding Christmas Day, Boxing Day and New Year's Day (save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out or other structural or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship)*
    - *No private events to take place in the Viewing Gallery between the*

hours of 10:00 and 19:00 or nautical dusk, whichever is later

- *All necessary and reasonable costs relating to full fit-out and landscaping covered*
- *Provision of the Viewing Gallery for the lifetime of the development*

- Provision of Cultural Space, to include but not limited to the following provisions:
  - *Provision of the Cultural Space no later than upon occupation.*
  - *Submission of Cultural Management Plan including confirmation of the cultural space operator*
  - *Public admission (including for restricted public events which may require booking) to the cultural space between the hours of 10:00 to 18:00 seven days a week, excluding Christmas Day, Boxing Day and New Year's Day (save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out or other structural or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship)*
  - *No private events to take place in any part of the Cultural Space between the hours of 10:00 to 18:00 save for any events that would require prior booking provided that those tickets are openly available to obtain by the general public.*
  - *All necessary and reasonable costs relating to fit-out covered*
  - *Provision of Cultural Space for the lifetime of the development*
- Television Interference Survey
- Wind Audit
- Solar Glare
- S106 Monitoring
  - *Contribution to be paid before Commencement*

1020. Officers request delegated authority to continue to negotiate and agree the terms of the proposed agreement to be entered into under Section 106 of the Town and Country Planning Act 1990 (and where necessary pursuant to any other enabling

powers and Section 278 of the Highways Act 1980).

1021. The scope of the s278 agreement may include, but is not limited to:

a. Fenchurch Street
    i. Reconstruction of the footways fronting the site
    ii. Resurfacing of the carriageway
    iii. Reinstatement of pedestrian island following construction, subject to detailed design and pedestrians desire line.
    iv. Reinstatement of road markings
b. Cullum Street
    i. Reconstruction of the footways fronting the site to accommodate new site layout
    ii. Provision of raised carriageway
    iii. Highways Drainage
    iv. Reinstatement of road markings and associated traffic orders
c. Fen Court
    i. Reinstatement of paved areas and associated works

Monitoring and Administrative Costs

1022. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

1023. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

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

1024. The City, as a public authority must, in exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1025. Section 149(3) of the 2010 Act provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1026. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. A detailed assessment of inclusivity and access benefits and constraints is provided in the Public Access and Inclusivity section above. As noted in that section a number of conditions are recommended to ensure that the proposed benefits are delivered and that further details are submitted for approval to ensure that the development meets best practice and provides for a highest standards of accessible and inclusive design as required by policy. It is the view of officers that a decision to grant permission in this case would reduce barriers to access for disabled people through the provision of a well-designed building (including publicly accessible spaces), and an enhanced and step-free public realm. Officers also consider that the provision of accessible floorspace, and publicly accessible garden, learning space, ambulant toilets and baby changing facilities would advance equality of opportunity for a number of groups sharing protected characteristics.

1027. The application is supported by an Equality Impact Assessment (prepared by Arup), which considers the potential equality impacts related to the proposal. The CoL, as the planning authority, have the duty to consider potential equality

impacts. The purpose of the Equality Statement (EqS) was to provide information for the planning authority to carry out its role.

1028. A qualitative assessment has been undertaken of potential disproportionate and differential effects, both positive and negative, that could arise from the implementation of the Proposed Development for those protected characteristic groups identified. The assessment makes recommendations for how any potential adverse equality effects may be mitigated and any potentially positive equality effects enhanced. Much of the recommendations (such as provision of sanitary uses) have been considered in the development or are proposed to be secured in various management plans. Of particular note are the conditions requiring information of signage/wayfinding and an Inclusive Access Management Plan.

1029. The proposed development would not result in an adverse impact on the ability to use the surrounding churches as places of worship and religious observance. As such, there would be no impact on those who share a protected characteristic relating to religious beliefs and practices.

Human Rights Act 1998

1030. It is unlawful for the City, as a public authority, to act in a way which is compatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).

1031. Insofar at the grant of planning permission will result in interference with right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby sensitive receptors. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the Draft City Plan 2040.

1032. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace and contributing to the City's primary business and professional services function, together with all other benefits that would arise from the provision of cultural, retail and Viewing Gallery spaces for

the public to enhance the role of the City as destination, outweighs any adverse impacts on nearby residential properties and that such impact is necessary in the interest of the economic well-being of the country and is proportionate.

1033. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, again it is the view of officers that such interference is in the public interest and proportionate.

Conclusion and Overall Planning Balance

1034. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations. The determination must be made in accordance with the development plan unless material considerations indicate otherwise.

1035. The proposal is for the phased development comprising the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

1036. The site is within the Central Activities Zone in a highly sustainable location, and within the City Cluster. The proposal would deliver a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

1037. The proposal would provide a significant increase in office floorspace – an uplift of c. 43,534 sqm delivering approximately 2.7% towards the total office floorspace target (1.6 million sqm gross) to be achieved by 2040 as aspired to by the City Plan 2040, which is estimated to accommodate up to 3,610 full-time equivalent (FTA) jobs. The proposed office floorplates would range between 893

sqm and 1,575 sqm NIA and have the potential to be split into multiple tenancies to cater to a range of occupiers.

1038. The development results in some loss of retail within a Principal Shopping Centre and Retail Link however this is considered acceptable when taking into account the nature of the development and the other benefits of the scheme, such as the provision of new active frontages at ground level for retail and cultural uses, the cultural uses described above and the new pedestrian route linking Fen Court Garden to Leadenhall Market. Furthermore, the principle of loss of retail in this location has been accepted within previous application on site and as such considered acceptable.

1039. Architecturally, the proposal would bring a rare beauty to the Cluster, being of a uniquely elegant architectural character and skyline presence, befitting the pivotal location of its site on the southern edge of the City Cluster. It would deliver substantial uplift in commercial space and cultural and public space with flair and would bring enhancements to its ground floor and skyline surroundings. This is in line with the long-term Plan-led approach to consolidating substantial uplift in commercial uses in the defined City Cluster of tall buildings, allowing for the capacity of the site to be optimised relative to strategic heritage constraints, whilst allowing for higher densities commensurate with the uniquely high levels of economic agglomeration and public transport connectivity in this part of the City of London and wider CAZ.

1040. The proposal would result in a very minor exceedance of the relevant emerging City Plan 2040 contour lines. In the language of S12 (3), where a proposal is between the contour rings, it should successfully mediate between them and 'not exceed the next higher contour'. The proposal would exceed the 160m contour by 1.45m as designated by the emerging Draft City Plan. This isolated and very marginal exceedance in height would draw a degree of conflict with the policy. However, as the assessment against D9 C and D of the London Plan makes clear, the proposal would meet the requirements of the policy as set out in the remainder of S12 (3), namely that it is thoughtfully designed, would contribute positively to the skyline and townscape character, would contribute towards creating a coherent Cluster form and a varied and animated skyline, and would have architectural integrity. As such, the proposal is considered to comply with S12 overall.

1041. No objections have been received from statutory consultees or neighbouring boroughs. Historic England however have raised concerns about the scheme, considering that a low level less than substantial harm would be caused to the

Tower of London World Heritage Site; to the ability to appreciate attributes of the OUV of the World Heritage Site and the contribution that this development would make to a greater cumulative impact. Historic England also raise milder and somewhat vaguer concerns about the impact of the scheme on the local historic environment.

1042. For the reasons set out in the report, officers disagree with and rebut Historic England's conclusions. Officers have however considered these representations carefully and afford them considerable importance and weight. Where disagreement exists, clear reasoning has been provided in this report.

1043. Officers consider that, for the reasons set out above, the proposals would preserve the special architectural and historic interest, significance and setting of all relevant designated heritage assets and identified non-designated heritage assets in the vicinity identified in the THVIA, and the settings or significance of the Leadenhall Market, Eastcheap, Creechurch, Lloyds Avenue Conservation Areas.

1044. The proposal would not harm the setting of any designated or non-designated heritage assets and would not detract from LVMF, townscape, riverscape, skyline, protected views and views into and out of the surrounding conservation areas and would therefore comply with Local Plan policies CS12, CS13 and DM12.1, emerging City Plan 2040 policies S11, S13, HE1, and London Plan policies HC1, HC2, HC3 and HC4.

1045. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission. The wind microclimate impact of the development has been thoroughly assessed and the assessment concludes that conditions would suitable for the intended uses in the proposed and cumulative scenarios, and there would be no additional unacceptable wind impacts at street level. All on-site receptors would be suitable for their intended uses.

1046. The proposed development would have the potential to result in overshadowing to Fen Court Garden (significantly adverse). Officers note however that this same overshadowing result would occur once the 50 Fenchurch Street development has been constructed, a development that has been implemented with significant progression on site. This impact to Fen Court would therefore essentially for the existing baseline and therefore in reality the overshadowing from this development would be imperceptible and as such acceptable. Furthermore, Fen Court Garden only just currently meets the two hours threshold of light required, meaning that even without neighbouring development the absolute alteration of direct sunlight is limited and considered acceptable by Officers within a tightly knit urban environment.

1047. The scheme would deliver significant public realm enhancement, including a generously proportioned east-west passageway through the site, connecting Fen Court to the network of passageways and lanes connecting to Leadenhall Market. Further public realm enhancements would be created fronting Fenchurch Street and Cullum Street, creating a large permeable publicly accessible space within the site and delivering highways and public realm improvements.

1048. In transportation terms the proposal would provide significant betterment of the local public realm and highway through an aspirational scope of works, secured through S278 Agreement, meeting the aspirations set out in the City's Transport Strategy. 860 long term cycle parking spaces would be provided with associated shower and locker facilities, and 48 short stay spaces would be provided. The scheme has been designed to encourage active travel to the site. On analysis of the pedestrian environment, it is concluded that the net uplift in walking trips around the site can be satisfactorily accommodated via the proposed pedestrian network. Servicing and delivery trips can be accommodated within an on-site loading bay, with sufficient consolidation to be secured through a delivery and servicing management plan. In respect of demolition and construction traffic, deconstruction and construction logistics plans would be required by condition.

1049. The proposals comply with Strategic Objective 1 in the Local Plan and with the policies relating to offices and to economic growth.

1050. The proposals conflict with policies which seek to prevent the loss of retail floorspace in Principal Shopping Centres and Retail Links. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as the policies relating to tall buildings, heritage, design,

and public realm are also complied with, that notwithstanding the conflict with the retail policies, the proposals comply with the development plan when considered as a whole.

1051. The scheme would provide benefits through CIL and through improvements to the public realm, provision of housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement.

1052. Paragraph 10 of the NPPF sets out a presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

1053. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

- Arboricultural Development Statement and Tree Survey, prepared by Trium; (24 Apr 2025)
- Area Schedule, prepared by Turner and Townsend Alinea; (24 Apr 2025)
- Aviation Safeguarding Report, prepared by KL Grant Consulting; (24 Apr 2025)
- BREEAM Pre-Assessment (appended to Sustainability Statement), prepared by Arup; (24 Apr 2025)
- Circular Economy Statement (incl. GLA spreadsheets), prepared by Arup; (24 Apr 2025)
- Cultural Plan, prepared by Future City; (24 Apr 2025)
- Design and Access Statement, prepared by WEA, including:- Landscape Statement, prepared by Andy Sturgeon Landscape Architects; (24 Apr 2025)
- Draft Construction Environmental Management Plan, prepared by Real PM; (24 Apr 2025)
- Ecology Appraisal and BNG Metric, prepared by Trium; (24 Apr 2025)
- Energy Statement, prepared by Arup; (24 Apr 2025)
- Equalities Impact Assessment, prepared by Arup; (24 Apr 2025)
- Fire Statement, prepared by Arup; (24 Apr 2025)
- Flood Risk and Drainage Strategy, prepared by Arup; (24 Apr 2025)
- Ground contamination risk assessment and remediation strategy, prepared by Arup. (14 Jul 2025)
- Health Impact Assessment, prepared by Arup; (24 Apr 2025)
- Heritage Impact Assessment, prepared by Tavernor Consultancy and Millerhare; (24 Apr 2025)
- Inclusive Access Statement, prepared by All Clear; (24 Apr 2025)
- Outline Construction Logistics Plan, prepared by Velocity; (24 Apr 2025)
- Outline Delivery and Servicing Plan, prepared by Velocity; (24 Apr 2025)
- Outline Site Waste Management Plan, prepared by Velocity; (24 Apr 2025)
- Public Realm Management Plan, prepared by Andy Sturgeon Landscape Architects; (24 Apr 2025)
- Security Statement and Hostile Vehicle Mitigation, prepared by QCIC; (24 Apr 2025)
- Security Statement, prepared by QCIC; (24 Apr 2025)
- Statement of Community Involvement, prepared by Kanda Consulting; (24 Apr 2025)
- Sustainability Statement, prepared by Arup; (24 Apr 2025)
- Thermal Comfort Study, prepared by GIA; (24 Apr 2025)
- Transport Assessment, prepared by Velocity; (24 Apr 2025)
- Travel Plan, prepared by Velocity; (24 Apr 2025)
- Utilities Statement, prepared by Arup; (24 Apr 2025)
- Ventilation and Extraction Statement, prepared by Arup; and (24 Apr 2025)
- Whole Life Carbon Assessment (incl GLA spreadsheets), prepared by Arup. (24 Apr 2025)

Environmental Statement (24 Apr 2025)

- Volume I: Main Report, prepared by Arup, comprising:- Section 1: Introduction, prepared by Arup;
    i. Section 2: The Site and Surrounding Area, prepared by Arup;
    ii. Section 3: The Proposed Development, prepared by Arup;
    iii. Section 4: EIA Approach, prepared by Arup;
    iv. Section 5: Air Quality, prepared by Arup;
    v. Section 6: Archaeology, prepared by Mills Whipp;
    vi. Section 7: Daylight/Sunlight and Overshadowing and Solar Glare, prepared by GIA;
    vii. Section 8: Greenhouse Gas, prepared by Arup;
    viii. Section 9. Noise and Vibration, prepared by Sandy Brown;
    ix. Section 10: Wind Microclimate, prepared by RWDI;
    x. Section 11: Interactive Effects, prepared by Arup;

- Volume II: Townscape, Built Heritage and Visual Impact Assessment, prepared by Tavernor Consultancy (including Accurate Visual Representations by Millerhare);

- Volume III: Technical Appendices:-
  A. Introduction;
  D. EIA Approach;
  E. Air Quality;
  F. Archaeological Desk Based Assessment;
  G. Daylight, sunlight, overshadowing and solar glare;
  H. Greenhouse Gasses;
  I. Noise and Vibration Assessment;
  J. Wind and Microclimate; and

- Non-Technical Summary, prepared by Arup.

Representations - Members of the Public

None Received.

Representations/Consultation Responses

02/05/2025	Health and Safety Executive
02/05/2025	Active Travel England
02/05/2025	Transport for London (Crossrail Safeguarding)
06/05/2025	District Surveyors Office
08/05/2025	Civil Aviation Authority (CAA)

08/05/2025	Environment Agency
08/05/2025	NATS Safeguarding
09/05/2025	Lead Local Flood Authority
11/05/2025	City of London Cleansing Services
12/05/2025	City of London Environmental Resilience Officer
13/05/2025	London Gatwick
14/05/2025	Natural England
22/05/2025	Historic England - GLAAS
22/05/2025	Port of London Authority (PLA)
27/05/2025	Thames Water
27/05/2025	City of Westminster
28/05/2025	London City Airport
28/05/2025	London Borough of Lambeth
28/05/2025	Surveyor To the Fabric of St Paul's
29/05/2025	Department of Markets and Consumer Protection
02/06/2025	London Borough of Southwark
05/06/2025	Network Rail
09/06/2025	City of London Air Quality Officer
25/06/2025	Historic England
27/06/2025	Eastern City Business Improvement District
07/07/2025	London Borough of Islington
09/07/2025	London Borough of Tower Hamlets
11/07/2025	City of London Senior Public Health Practitioner
14/07/2025	City of London Aboricultural Officer
22/07/2025	City of London Access Officer
24/07/2025	City of London Transport Officer
30/07/2025	Transport for London
13/08/2025	Royal Borough of Greenwich
27/08/2025	Active Travel England
27/08/2025	NATS Safeguarding
28/08/2025	Heathrow Airport
28/08/2025	Heathrow Airport
28/08/2025	London City Airport
28/08/2025	Thames Water
02/09/2025	Crossrail Safeguarding
02/09/2025	Health And Safety Executive
04/09/2025	Historic England - GLAAS
11/09/2025	Environment Agency
11/09/2025	Port Of London Authority
12/09/2025	Natural England

APPENDIX A

Reasoned Conclusions of Significant Effects

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The applicants determined and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, archaeology, noise & vibration, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual impact, climate change, greenhouse gas emissions, and cumulative effects.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)). The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to be implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

69. Land Use - Office

The areas shown on the approved drawings as Office Use (Class E(g)(i)), shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

70. Land Use – Culture

The areas shown on the approved drawings as Culture (Class F1/E), shall be used for those purposes only and for no other purpose (including any other purpose in Class F and E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

71. Land Use – Public Viewing Gallery

The areas shown on the approved drawings as Public Viewing Gallery (Sui Generis), shall be used for those purposes only and for no other purpose (including any other purpose in Sui Generis) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

72. Land Use – Retail

The areas shown on the approved drawings as Retail (Class E(a)-(b)), shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

73. Floorspaces

The development shall provide (all figures GIA and excluding plant):

- 57,491 sqm Office Use (Class E(g)(i));
- 569 sqm Culture (Class F1/E)
- 644sqm Public viewing gallery (Sui Generis)
- 370 sqm Retail (Class E(a)-(b))

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and Travel Plan including a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures as required. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions, and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions

APPENDIX B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspaces
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G4 Open Space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure

- Policy SI6 Digital connectivity Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning

• Accessible London: Achieving an Inclusive Environment SPG (October
• 2014);
• Control of Dust and Emissions during Construction and Demolition SPG
• (September 2014);
• Sustainable Design and Construction (September 2014);
• Social Infrastructure (May 2015);
• Culture and Night-Time Economy SPG (November 2017);
• London Environment Strategy (May 2018);
• London View Management Framework SPG (March 2012);
• Cultural Strategy (2018);
• Mayoral CIL 2 Charging Schedule (April 2019);
• Central Activities Zone (March 2016)
• Mayor's Transport Strategy (2018);
• Public London Charter LPG (September 2021);
• Optimising Capacity – A Design Led Approach LPG (June 2023);
• Urban Greening Factor LPG (February 2023);
• Characterisation and Growth Strategy LPG (June 2023); and
• Draft Fire Strategy LPG (February 2022).

Emerging City Plan 2040

- Emerging Strategic Policy S1: Health and Inclusive City
- Emerging Policy HL1: Inclusive buildings and spaces
- Emerging Policy HL2: Air quality
- Emerging Policy HL3: Noise
- Emerging Policy HL4 Contaminated land and water quality
- Emerging Policy HL5: Location and protection of social and community facilities
- Emerging Policy HL6: Public Toilets
- Emerging Policy HL7 Sport and Recreation

- Emerging Policy HL8 Play areas and facilities
- Emerging Policy HL9: Health Impact Assessment (HIA)
- Emerging Strategic Policy S2: Safe and Secure City
- Emerging Policy SA1: Publicly accessible locations
- Emerging Policy SA2 Dispersal Routes
- Emerging Policy SA3: Designing in Security
- Emerging Strategic Policy S3: Housing
- Emerging Policy HS3: Residential Environment
- Emerging Strategic Policy S4: Offices
- Emerging Policy OF1: Office Development
- Emerging Policy OF2: Protection of Existing Office Floorspace
- Emerging Policy OF3 Temporary 'Meanwhile' Uses
- Emerging Strategic Policy S5 Retail and Active Frontages Policy
- RE1: Principal Shopping Centres
- Emerging Policy RE2 Active Frontages
- Emerging Strategic Policy S6: Culture and Visitors
- Emerging Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Emerging Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Emerging Policy CV3: Provision of Visitor Facilities
- Emerging Policy CV5 Evening and Night-Time Economy
- Emerging Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Emerging Policy N1 Infrastructure Provision and Connection
- Emerging Policy IN1: Infrastructure Capacity
- Emerging Strategic Policy S8: Design
- Emerging Policy DE1: Sustainable Design
- Emerging Policy DE2: Design Quality
- Emerging Policy DE3: Public Realm
- Emerging Policy DE4: Terraces and Elevated Public Spaces
- Emerging Policy DE5 Shopfronts
- Emerging Policy DE6 Advertisements
- Emerging Policy DE7: Daylight and Sunlight
- Emerging Policy DE8: Lighting
- Emerging Strategic Policy S9: Transport and Servicing
- Emerging Policy VT1: The impacts of development on transport
- Emerging Policy VT2 Freight and Servicing
- Emerging Policy VT3: Vehicle Parking
- Emerging Policy VT5: Aviation Landing Facilities
- Emerging Strategic Policy S10: Active Travel and Healthy Streets
- Emerging Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Emerging Policy AT2: Active Travel including Cycling
- Emerging Policy AT3: Cycle Parking
- Emerging Strategic Policy S11: Historic Environment
- Emerging Policy HE1: Managing Change to Historic Environment Development
- Emerging Policy HE2: Ancient Monuments and Archaeology

- Emerging Policy HE3: Setting of the Tower of London World Heritage Site
- Emerging Strategic Policy S12: Tall Buildings
- Emerging Strategic Policy S13: Protected Views
- Emerging Strategic Policy S14: Open Spaces and Green Infrastructure
- Emerging Policy OS2: City Urban Greening
- Emerging Policy OS3: Biodiversity
- Emerging Policy OS4: Biodiversity Net Gain
- Emerging Policy OS5 Trees
- Emerging Strategic Policy S15: Climate Resilience and Flood Risk
- Emerging Policy CR1: Overheating and Urban Heat Island Effect
- Emerging Policy CR3 Sustainable Drainage Systems (SuDs)
- Emerging Policy CR4 Flood Protection and Flood Defences
- Emerging Policy CE1 Sustainably Waste Facilities and Transport
- Emerging Strategic Policy S16: Circular Economy and Waste
- Emerging Strategic Policy S21: City Cluster
- Emerging Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability February 2025
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD,
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Offices
To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Utilities infrastructure
To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety
To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions
To manage the impact of development, seeking appropriate developer contributions.

CS7 Eastern Cluster
To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

CS10 Design
To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS11 Visitor, arts and culture
To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment
To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

CS13 Protected views

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

CS14 Tall Buildings

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

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.
4. Ensuring that tall building proposals do not adversely affect the operation of London's airports.

CS15 Sustainable development and climate change

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

CS16 Public transport, streets and walkways

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

CS17 Waste

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

CS18 Flood risk

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

CS19 Open Spaces and Recreation

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

CS20 Retailing

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

CS21 Housing
To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity
To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM1.3 Small and medium business units
To promote small and medium sized businesses in the City by encouraging:

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

DM1.5 Mixed uses in commercial areas
To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision
1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

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

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

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

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

Policy DM 3.1 Self-containment in mixed use developments

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

DM3.2 Security measures

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

- building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- measures to be integrated with those of adjacent buildings and the public realm;
- that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to 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.

DM3.3 Crowded places

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

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

DM3.4 Traffic management

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

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

DM3.5 Night-time entertainment

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

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

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

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

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

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

DM10.3 Roof gardens and terraces

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

- immediately overlook residential premises;
- adversely affect rooflines or roof profiles;

- result in the loss of historic or locally distinctive roof forms, features or coverings;
- impact on identified views.

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

DM10.4 Environmental enhancement

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

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

Policy DM 10.5 Shopfronts

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

- respect the quality and architectural contribution of any existing shopfront;
- respect the relationship between the shopfront, the building and its context;
- use high quality and sympathetic materials;

- include signage only in appropriate locations and in proportion to the shopfront;
- consider the impact of the installation of louvres, plant and access to refuse storage;
- incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- resist external shutters and consider other measures required for security;
- consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

Policy DM 10.6 Advertisements

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

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

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

DM12.4 Ancient monuments and archaeology

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

DM15.1 Sustainability requirements

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

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:

- energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
- carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

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

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining

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

DM15.5 Climate change resilience

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

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to onsite emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical,

mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation

DM15.8 Contaminated land and water quality
Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development
1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

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

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

DM 16.2 Pedestrian movement
1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

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

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long

and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

Policy DM 16.6 Public car parks
No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

DM17.1 Provision for waste
1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste
New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

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

DM18.1 Development in Flood Risk Area
1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

- the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

- the benefits of the development outweigh the flood risk to future occupants;
- the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- all sites within the City Flood Risk Area as shown on the Policies Map; and
- all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

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

Policy DM 18.3 Flood protection and climate change resilience

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

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible,

new or enhanced open space should be provided near the site, or elsewhere in the City. 2. New open space should:

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

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

DM19.2 Biodiversity and urban greening

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

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

DM 20.1 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.

DM 20.2 Retail links

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged

in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

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.

DM21.3 Residential environment

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

DM 22.1 Location and protection of social and community facilities

1. To resist the loss of social and community facilities unless:
    - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
    - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
    - it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- in locations which are convenient to the communities they serve;
- in or near identified residential areas, providing their amenity is safeguarded;
- as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

APPENDIX C

SCHEDULE

Application: 25/00529/FULEIA

130 Fenchurch Street London EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

CONDITIONS

CONDITIONS

Time Limit	
1.	**Time Limit - 3 Years** 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.
Environmental Health	
2.	**Plant Noise** (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time 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 shall be taken (unless

	otherwise agreed in writing by the local planning authority) 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 ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.
3.	**Scheme for Protecting Nearby Residents and Commercial Occupiers from Noise (Demolition)** There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
4.	**Scheme for Protecting Nearby Residents and Commercial Occupiers from Noise (Construction)** There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements

	for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.
5.	**Flue Placement** Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the kitchen use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
6.	**Plant Mounts** 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.
7.	**Deconstruction Logistics Plan** Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during

	deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority. REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.
8.	**Construction Logistics Plan** Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority. REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
9.	**NRMM** Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM

	Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
10.	**Sound Insulation** The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above 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.
11.	**Grease Removal** Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8.
12.	**Maintenance of Extraction Equipment** All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

	REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
13.	**Terrace Use – Hours of Use** The external terraces hereby permitted shall not be used or accessed between the hours of 22:00 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.
14.	**Terrace Use – Amplified Music** No amplified or other music shall be played on the 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.
15.	**Contamination – Site Investigation** Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
16.	**Contamination – Remediation**

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

	REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
SuDS / Water	
18.	**SuDS** Prior to the commencement of Phase 2 of the development, the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater harvesting, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 186m3; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
19.	**SuDS Maintenance** Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

	(a) A Lifetime Maintenance Plan for the SuDS system to include: • A full description of how the system would work, it's aims and objectives and the flow control arrangements; • A Maintenance Inspection Checklist/Log; • A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
20.	**Thames Water – Piling method statement (waste)** No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
21.	**Thames Water – Construction near water main** No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in

	accordance with the terms of the approved piling method statement and piling layout plan. REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
22.	**Thames Water – Water Network** No development shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development
Archaeology	
23.	**Written Scheme of Investigation** 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) 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

	REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
24.	**Foundation Design** No development except demolition to slab level shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Aviation	
25.	**Photovoltaic cells (Glint & Glare)** No solar photovoltaic panels shall be fixed in place until the developer has completed a "Glint and Glare Assessment" which has been submitted to and approved in writing by the Local Planning Authority in consultation with London City Airport. Installation, operation, and maintenance of the solar photovoltaic panels shall thereafter be in accordance with the approved "Glint and Glare Assessment", which is approved by London City Airport. **REASON:** London City Airport requires a glint and glare assessment to determine the full impact on Air Traffic Control facilities and pilots.
26.	**Permanent Obstacle Lighting Scheme** Obstacle lights shall be placed on all corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation. REASON: In the interest of aircraft safety and the operation of London City Airport.
Wind mitigation	
27.	Prior to the commencement of Phase 2 of the development, the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and

	appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority. REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
Sustainability	
28.	**Circular Economy – Pre-commencement** a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The audit shall include details of the reuse and recycling of deconstruction materials, including but not limited to the stone façade cladding. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. b) Prior to the commencement of Phase 2 of the development and following completion of RIBA Stage 4, an update to the approved detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority. The statement shall include a site waste management plan that reaffirms the proposed strategy or demonstrates improvements, and an updated access and maintenance strategy that considers disassembly, replacement and maintenance of building elements that require more frequent replacement. The Statement must be prepared in accordance with the GLA Circular Economy Guidance and demonstrate that the development is designed to meet the relevant targets set out in the guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements. The development shall be carried out, and operated and managed throughout its life cycle, in accordance with the approved details.

	REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2; emerging City Plan 2040 policies DE1, S16, CE1.
29.	**Circular Economy - Post-construction** Within 3 months of practical completion (RIBA Stages 6/7), a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement. The Statement is to include actual waste arisings and final processing routes for all existing materials. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan, Policies CS15 and DM17.2 of the Local Plan (2015) and Policies DE1, S16, CE1 of emerging City Plan 2040.
30.	**Whole life-cycle carbon emissions - Pre-commencement** Prior to the commencement of Phase 2 of the development and following completion of RIBA Stage 4, an update to the approved detailed Whole Life-Cycle Carbon Assessment (WLCA) shall be submitted to and approved in writing by the Local Planning Authority, setting out further opportunities to reduce emissions towards the GLA's Standard and Aspirational Benchmarks (as set out in the GLA's Whole Life-Cycle Assessment Guidance). The assessment shall include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessment. The development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local

	Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
31.	**Whole life-cycle carbon emissions - Post-construction** Within 3 months of practical completion (RIBA Stages 6/7), a post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received no later than three months post as-built design completion, unless otherwise agreed. REASON: To ensure that the development has maximised the reduction of carbon emissions in line with the application proposal and that the whole-life-cycle carbon emissions of the development, as-built, are calculated and reported, in accordance with Policy SI2 of the London, Local Plan 2015 policies, DM15.2, DM 17.2 and emerging City Plan 2040: S8, DE1.
32.	**Façade System** Prior to the commencement of development, excluding demolition, an assessment of the types and designs of the proposed glazed façade systems that provide the best balance between reducing embodied carbon, solar gain and operational carbon emissions, including ease of replacement of components and parts, and opportunities to incorporate passive ventilation should be undertaken for the different elevations of the building. The assessment is required to be submitted to and approved in writing by the Local Planning Authority. To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1
33.	**District Heating Network connection** The development shall be designed to allow for the future connection into a district heating network in anticipation of such a network becoming available during the lifetime of the development. Prior to the

	commencement Phase 2 of the development, details of the design for a future energy network connection shall be submitted to and approved in writing by the local planning authority, including: • a single point of connection to the district heating network • a space allocated for heat exchangers or other plant as required • a safe-guarded pipe route to the site boundary, and sufficient space in cross-section for primary district heating pipes where proposed routes are through utility corridors The development shall be implemented in accordance with the approved details and be retained as such for the lifetime of the development. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the London Plan: SI3 - Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4 - emerging City Plan 2040 policy DE1.
34.	**Emergency power supply** Prior to the commencement of development, excluding demolition, details of the emergency power supply shall be submitted to and approved in writing by the LPA. Details shall include an assessment of feasible non-combustion alternatives and confirmation of the proposed technology for the development. The selected supply shall follow the emergency supply hierarchy detailed in the Planning for Sustainability SPD, 2025. Where it is not possible to deploy alternatives in the hierarchy, proper justification shall be submitted to and approved by the LPA prior to commencement of development. Where diesel generators are justified, they must comply with the Air Quality SPD 2017 and details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time. The development shall be implemented in accordance with the approved details and be retained as such for the lifetime of the development. REASON: To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.
35.	**BREEAM**

	A Post construction BREEAM assessment(s) covering all areas/use classes, (combined or individually assessed) demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that the development performs well against a broad range of sustainability criteria including the reduction of carbon emissions and climate resilience, in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
36.	**Public, Regenerative and Well-Being-Led Spaces** Prior to the commencement of the development details of publicly accessible routes and spaces at ground floor and terrace levels to create a sequence of regenerative, well-being-led spaces shall be submitted to and approved in writing by the LPA. REASON: To demonstrate that the development performs well against a broad range of sustainability criteria and climate resilience, in accordance with the following policies of the Local Plan: CS15, DM15.1 and emerging City Plan 2040 policy S8, DE1.
37.	**NABERS DfP** Prior to the commencement of Phase 2 of the development, a NABERS Design for Performance (DfP) agreement shall be submitted to and approved in writing by the LPA. The submitted details shall demonstrate how the design intent for energy performance will be maintained from design through to occupation and formal rating. REASON: To ensure that the development has maximised the reduction of operational carbon emissions and has a high operational energy efficiency in accordance with London Plan Policy SI2, Local Plan 2015 policy DM15.2 and emerging City Plan 2040 policy DE1.
38.	**NABERS Post Completion** Within three months of completion of the NABERS rating period, the NABERS certification and associated reports shall be submitted to the LPA. If a development does not achieve the 5-star target, a report shall set out the reasons why, and detail a strategy for how the development will achieve its target certification in the subsequent rating period.

	REASON: To ensure that the development has maximised the reduction of operational carbon emissions and has a high operational energy efficiency in accordance with London Plan Policy SI2, Local Plan 2015 policy DM15.2 and emerging City Plan 2040 policy DE1.
39.	**Urban Greening and Biodiversity** Before any works hereby affected are begun, details of a holistic urban greening strategy, including the type of planting, hard landscaping, materials and an appropriate maintenance regime for: a. the green walls, green roofs, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; b. the position and size of the green/blue roofs; c. the landscaping of the public realm; d. confirmation that the requested details achieve or exceed the proposed UGF and BNG targets for the site; shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk). REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2 and emerging City Plan 2040 policy OS3 Biodiversity.
40.	**Habitat Management and Monitoring Plan** Prior to the commencement of Phase 2 of the development, a Habitat Management and Monitoring Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring • detailed locations/specifications of boxes for swifts / house sparrows / bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion)

	• build-up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). • All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk). The measures as set out in the plan shall be carried out and so maintained in perpetuity. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2 and emerging City Plan 2040 policy OS3 Biodiversity.
41.	**Post Construction UGF and BNG** Within 6 months of completion details of the measures installed to meet or exceed the approved Urban Greening Factor and Biodiversity Net Gain scores, to include plant and habitat types and species, scaled drawings identifying the size and position of measures, and maintenance plans, shall be submitted to the Local Planning Authority. Urban greening and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. Any survey data collected is to be submitted to Greenspace Information for Greater London CIC (GiGL) to support the City of London fulfilling its statutory reporting requirements. REASON: To comply with London Plan Policy G5, Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.
Design / Public Realm	
42.	**Design** 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. Detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including reference to materials, finishes, lighting, details of jointing, and drip details,

	and any necessary expansion/movement joints; and ventilation panels; b. Notwithstanding the approved drawings, full details and 1:20 drawings in plan section and elevation, of the new ground and first-floor elevations, including all shopfronts, entrances and door design, clear glazing, integrated signage, art panels, and information boards, and their material specifications finishes and fixing details; c. Notwithstanding the approved drawings, full design details of the bespoke roller shutter and soffit design for the servicing area/bay; d. Details of an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority. e. Particulars and samples of all the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy, and inclusive access management plan; f. construction of 1:1 sample material and facade panels of agreed sections of the facades; g. Full details of all terraces, including all elevations, layouts, entrance design and location, fenestration, planters, seating, lighting, soffits, drainage, irrigation, balustrades and any other infrastructure required, demonstrating adequate microclimatic mitigation has been considered where necessary; h. Details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; i. Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; j. Details of the integration of M&E and building services into the external envelope, including but not limited to, details of external ducts, vents, louvres and extracts; k. Details of access to the roof for cleaning and maintenance, including details of mansafe equipment; l. Full details of the rooftops including any plant equipment and the roofscape; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040 and to support inclusion, public access, legibility and wayfinding in accordance with the

	following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
43.	**Suicide Prevention** Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan:, CS3, DM3.2 DM10.1 and DM12.2.
44.	**Landscaping** Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. details of all soft landscaping, including the position, size and types of plants, specifying their seasonal interest, in addition and their contribution to biodiversity and local habitat; b. details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights, overall height, canopy size when installed and when mature; and details of tree pits/trenches and growing medium for soft and hard surfaces and their respective top and subsoil requirements as per British standards; c. details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation; d. details of the method of irrigation and nutrient delivery systems for all soft landscaped areas; e. Notwithstanding the approved drawings, details of all furniture, including planters; seating; refuse bins; drinking water fountains, biodiversity habitat structures;

	f. Details of Hostile Vehicle Mitigation measures g. details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual; h. details of the Landscape management and maintenance plan (LMMP) for all soft and hard landscaping, including ecological management, specialist tree management, and street furniture for all proposed landscaping All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and policies DE2, DE3 DE8 and HE1 of the emerging City Plan 2040
45.	**Lighting Strategy** Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: (a) lighting layout/s; (b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits); (c) a lighting control methodology; (d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; (e) all external, semi-external and public-facing

	parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; (f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; (g) details of aviation lights including locations; and (h) details of how the lighting proposals will be inclusive for a range of people including options for testing sightlines and transitions. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and DM15.7 and City of London Lighting Strategy SPD.
Accessibility	
46.	**Signage and wayfinding** Prior to occupation, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, inclusive and accessible routes and facilities, cycle parking, cultural uses and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority. REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
47.	**Inclusion and accessibility** Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) All surface materials including details of slip resistance, contrast, colour, texture and acoustic properties, as appropriate; b) Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation,

	thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20; c) Security measures including provision of wider aisle gates at all controlled points of entry; d) Details of the cycle stand types and setting out of long stay cycle spaces, including swept paths, and end of trip facilities and access routes; e) Details of planting and maintenance for areas of landscape including how unwelcome touch and scent can be avoided f) Glare analysis for visual comfort demonstrating how disabling and/or disability glare will be avoidedDetails and specification for all lifting devices including doors, widths, control panels, floor surfaces, means of operation and internal car dimensions g) Details of the lighting and music curation for the public lift to the level 17 and 20 cultural spaces; h) Irrespective of approved drawings landscaping details of spend areas for assistance animals; i) Details of left and right hand transfer wheelchair accessible WC facilities in the new office building; j) Irrespective of approved drawings details of sanitary provision for the cultural space; REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.
48.	**Lift Management and Maintenance Plan** Prior to first occupation, a Lift Management and Maintenance Plan (LMMP) shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include details of: a) A schedule of routine inspection and maintenance; b) Arrangements for emergency repair and response, including maximum repair timeframes in the event of a breakdown; c) A contingency plan for providing alternative temporary access during lift downtime; d) Provisions for the safe evacuation in the event of fire when the lift is out of operation in line with the building's fire safety strategy and Personal Emergency Evacuation Plans (PEEPs); and e) A designated responsible party for overseeing compliance with the plan. The lift shall thereafter be managed and maintained in full accordance with the approved Lift Management and Maintenance Plan for the lifetime of the development.

	REASON: To ensure continuous, reliable access to the building for the lifetime of the development in accordance with Policy DM 10.8.
49.	**Inclusive Access Management Plan** Inclusive Access Management Plan Prior to the occupation of the relevant part of the development, an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for: 1. Website information including photos and an easy read version with information on: a) Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m b) Location of dropped kerbs c) Facilities available on-site including dimensions and photos for (as appropriate): i. Step-free entrance points and entrances and lift access ii. Sanitary provision including but not exclusively accessible toilets, ambulant toilets and baby changing facilities. iii. facilities for assistance animals iv. equipment loan v. assistive listening system and other assistive technology vi. rest and recovery facilities/quiet room vii. Room for reflection/prayer viii. plant species 2. Inclusive Entrances Strategy 3. Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering 4. Booking information for visiting the cultural space including arrangements for: a) Alternatives to online booking b) queuing eg for people who are not able to stand for period c) Security d) essential companions e) assistance animals

	f) places for rest and recovery 5. Inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs) The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.
Highways and Transportation	
50.	**Refuse/ Recycling Storage and collection** The refuse collection and storage facilities shown on the drawings No. 02163-WEA-ZZ-B2-DR-A-0996 Rev P00 and 02163-WEA-ZZ-00-DR-A-0999 Rev P00 and as outlined in the Outline Delivery and Servicing Plan, April 2025, (or any other updated plans approved by us as local planning authority) shall be provided and maintained throughout the life of the building for the use of all the occupiers. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5.
51.	**Threshold Levels** Before any construction work, excluding demolition, begins, the proposed threshold levels within the entire perimeter of the site must be submitted to the Local Planning Authority for approval. REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory ground levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement and should be submitted in Cad Format for analysis.
52.	**Outward Opening Doors** No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.
53.	**Site Condition Survey** Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the

	perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority REASON: To ensure the satisfactory reinstatement of the highways, upon completion of construction works, in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.
54.	**Demolition and Construction Management Plan (Highways)** 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 be 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 6.14 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.
55.	**Stopping Up Order** Prior to the commencement of Phase 2 of the development, the applicant is required to apply for a stopping up order under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: https://www.gov.uk/government/publications/stopping-up-and-

	diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
56.	**Protection of Subway Pipes** Prior to the commencement of any construction works, a basement impact and ground movement assessment is required to be submitted to and approved by the Local Planning Authority in writing. REASON: To ensure that demolition and construction works do not adversely impact the existing Fenchurch Avenue subway pipes, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1.
57.	**Service and Delivery (Facilities)** Before the use authorised by this permission commences, adequate facilities for servicing must be provided within the curtilage of the site for loading and unloading. Details of such facilities must be submitted to and approved in writing by the Local Planning Authority. The approved facilities must be maintained and used as approved for the life of the building. REASON: To ensure that traffic in surrounding streets is not impeded, and a free flow of traffic is maintained in accordance with the following policy of the Local Plan: DM16.5.
58.	**Hours of Servicing** Deliveries, servicing, including refuse recycling vehicle trips (excluding any on-foot and cargo bike deliveries) shall take place between the hours of 23:00 to 7:00, Monday to Sunday. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM16.1, DM21.3.
59.	**Car Parking** Designated car parking spaces shall be provided on the site for use by people with disabilities in accordance with the requirements of the

	London Plan. These spaces shall be clearly marked, maintained throughout the life of the building, and be readily available for use by disabled occupiers and visitors at no charge to the individual end users of the parking. REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
60.	**Public Highway to be maintained prior to closure order** The public highways shall remain as public until such time as the necessary Stopping-up Order has come into effect. No implementation is permitted until then. REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
61.	**HVM** The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
Air Quality	
62.	**Landlord Plant Emissions** The landlord generator must comply with the Air Quality SPD 2017 and details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air

	quality in accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.
63.	**Tenant Plant Emissions** Prior to any tenant generator being commissioned and installed in or on the building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall include an Air Quality Neutral assessment completed in line with the latest Air Quality Neutral guidance. The assessment shall detail how the plant will minimise emissions and comply with the Air Quality SPD 2017. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.
64.	**Condition M32 NRMM** Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
65.	**Flue Design** Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

	REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.
66.	**Fire Safety** The development shall be carried out in accordance with the approved details within the Fire Statement (dated April 2025) prepared by ARUP. REASON: To ensure that the development incorporates the necessary fire safety measures
67.	**Telecommunications equipment** Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
68.	**BMU** At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
Use Classes and Plans	
69.	**Land Use - Office** The areas shown on the approved drawings as Office Use (Class E(g)(i)), shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

	REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
70.	**Land Use – Culture** The areas shown on the approved drawings as Culture (Class F1/E), shall be used for those purposes only and for no other purpose (including any other purpose in Class F and E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
71.	**Land Use – Public Viewing Gallery** The areas shown on the approved drawings as Public Viewing Gallery (Sui Generis), shall be used for those purposes only and for no other purpose (including any other purpose in Sui Generis) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
72.	**Land Use – Retail** The areas shown on the approved drawings as Retail (Class E(a)-(b)), shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

	REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
73.	**Floorspaces** The development shall provide (all figures GIA and excluding plant): - 57,491 sqm Office Use (Class E(g)(i)); - 569 sqm Culture (Class F1/E) - 644sqm Public viewing gallery (Sui Generis) - 370 sqm Retail (Class E(a)-(b)) REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
74.	**Phasing Plans** The proposed development must be carried out in accordance with the approved phasing plan, setting out the phases of development as follows: - Phase 1: Demolition Works - Phase 2: Basement Construction Works - Phase 3: Main Construction Works REASON: To ensure that the development is carried out in a satisfactory manner, is phased for the purposes of the Community Infrastructure Levy (2010, as amended) and to ensure that the planning benefits of the scheme are delivered in accordance with the approved development
75.	**Approved Plans** 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: Location Plans 02163-WEA-ZZ-ZZ-DR-A-0100 P00; 02163-WEA-ZZ-ZZ-DR-A-0101 P00; 02163-WEA-ZZ-ZZ-DR-A-0102 P00; Phasing Plans 02163-WEA-ZZ-ZZ-DR-A-0105 P00; 02163-WEA-ZZ-ZZ-DR-A-0106 P00; 02163-WEA-ZZ-ZZ-DR-A-0107 P00 Proposed Plans

	02163-WEA-ZZ-B3-DR-A-0995 P00; 02163-WEA-ZZ-B2-DR-A-0996 P00; 02163-WEA-ZZ-B1-DR-A-0997 P01; 02163-WEA-ZZ-B1M-DR-A-0998 P00; 02163-WEA-ZZ-00-DR-A-0999 P01; 02163-WEA-ZZ-00M-DR-A-1000 P00; 02163-WEA-ZZ-01-DR-A-1001 P00; 02163-WEA-ZZ-02-DR-A-1002 P00; 02163-WEA-ZZ-03-DR-A-1003 P00; 02163-WEA-ZZ-04-DR-A-1004 P00; 02163-WEA-ZZ-05-DR-A-1005 P00; 02163-WEA-ZZ-06-DR-A-1006 P00; 02163-WEA-ZZ-07-DR-A-1007 P00; 02163-WEA-ZZ-08-DR-A-1008 P00; 02163-WEA-ZZ-09-DR-A-1009 P00; 02163-WEA-ZZ-10-DR-A-1010 P00; 02163-WEA-ZZ-11-DR-A-1011 P00; 02163-WEA-ZZ-12-DR-A-1012 P00; 02163-WEA-ZZ-13-DR-A-1013 P00; 02163-WEA-ZZ-14-DR-A-1014 P00; 02163-WEA-ZZ-15-DR-A-1015 P00; 02163-WEA-ZZ-16-DR-A-1016 P00; 02163-WEA-ZZ-17-DR-A-1017 P01; 02163-WEA-ZZ-18-DR-A-1018 P00; 02163-WEA-ZZ-19-DR-A-1019 P00; 02163-WEA-ZZ-20-DR-A-1020 P01; 02163-WEA-ZZ-21-DR-A-1021 P00; 02163-WEA-ZZ-22-DR-A-1022 P00; 02163-WEA-ZZ-23-DR-A-1023 P00; 02163-WEA-ZZ-24-DR-A-1024 P00; 02163-WEA-ZZ-25-DR-A-1025 P00; 02163-WEA-ZZ-26-DR-A-1026 P00; 02163-WEA-ZZ-27-DR-A-1027 P00; 02163-WEA-ZZ-28-DR-A-1028 P00; 02163-WEA-ZZ-29-DR-A-1029 P00; 02163-WEA-ZZ-30-DR-A-1030 P00; 02163-WEA-ZZ-31-DR-A-1031 P00; 02163-WEA-ZZ-32-DR-A-1032 P00; 02163-WEA-ZZ-33-DR-A-1033 P00; 02163-WEA-ZZ-34-DR-A-1034 P00; 02163-WEA-ZZ-34M-DR-A-1035 P00; 02163-WEA-ZZ-RF-DR-A-1099 P00; Proposed Elevations 02163-WEA-ZZ-ZZ-DR-A-2000 P01; 02163-WEA-ZZ-ZZ-DR-A-2001 P01; 02163-WEA-ZZ-ZZ-DR-A-2002 P01; 02163-WEA-ZZ-ZZ-DR-A-2003 P01; 02163-WEA-ZZ-ZZ-DR-A-2010 P01; 02163-WEA-ZZ-ZZ-DR-A-2011 P01; 02163-WEA-ZZ-ZZ-DR-A-2012 P01; 02163-WEA-ZZ-ZZ-DR-A-2013 P01; Proposed Sections 02163-WEA-ZZ-ZZ-DR-A-2500 P00; 02163-WEA-ZZ-ZZ-DR-A-2501 P00; 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. Archaeology – Written Scheme of Investigation
   The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance

with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

2. Archaeology – Foundation Design.
   The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation designs for approval.

3. CAA Building Notification
   If any part of the development exceeds 91.4m AGL, upon grant of permission, OPDC is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 ‘Safeguarding of Aerodromes & Military Explosives Storage Areas’.

4. CAA Crane Notification
   Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk) The following details should be provided before the crane is erected:

   - the crane's precise location
   - an accurate maximum height
   - start and completion dates

5. Access for Disabled People
   Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

6. This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as the Highway Authority; and works on the public highway must not be commenced until the consent of the Highway Authority has been obtained along with relevant licences and legal agreements.

7. Works to the public highway, are undertaken via a Section 278/38 Agreement. It forms part of a separate process along with associated fees. The planning permission hereby granted does not authorise these works to be carried out without the necessary agreement, approvals and relevant highways licences.

8. A stopping up order is a legal process under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk

9. You are advised to comply with the New Roads and Street Works Act 1991 and notify the Street Authority of any proposed works in accordance with the Act

10. The City Operations (Highways Management & Maintenance) must be consulted on the following matters which require specific approval:

    a. Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works, including temporary crossovers. Information can be found at: Highway licences - City of London

    b. The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act

1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the City Operations is recommended to ensure the design of the building provides for the inclusion of street lighting. Information can be found at: deshighwaysupport@cityoflondon.gov.uk

c. The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). Information on projection licences can be found at: Bridges and highway structures - City of London

11. You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner to secure the air space. Please contact the Corporate Property Officer, City Surveyor's Department at: district.surveyor@cityoflondon.gov.uk

    a. Bridges over highways, approval for moving an abnormal load through the City of London is required prior to operations. Your proposal must include your intended route and should be emailed to the Bridges team at bridges@cityoflondon.gov.uk. Allow at least three working days for us to process your application.

12. Roof Gardens

    The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

13. Compliance with the Clean Air Act 1993

    Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of

more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

14. Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

15. Thames Water

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

16. Environmental Agency (Water Resources)

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM ‘excellent’ standards for water consumption. We also recommend you contact your local planning authority for more information.

17. CIL

The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

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

- Office 185GBP per sq.m
- Retail 165GBP per sq.m Hotel 140GBP per sq.m
- All other uses 80GBP per sq.m

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

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

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

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

18. Noise Insulation: Part (a) “noise sensitive premises” includes commercial properties such as offices. Part of the rationale for the 10dB below background is the prevention of ambient creep i.e. the gradual increase in background noise levels due to successive small incremental changes. This has become more important with the increasing uptake of electric vehicles

and other quieter forms of transport in recent years. With this trend likely to continue plant noise will become the dominant noise source in highly built-up areas such as the City of London. It is, therefore, important to maintain or improve the general acoustic environment in order to minimise adverse noise impacts on residents, workers and visitors in the area. The lowest typical background noise level should be determined on a case by case basis with due regard to BS4142 and other relevant standards. Justification for the method of determination of the lowest typical background noise level should be provided. Background noise levels should be determined over a period of time when it would be anticipated that noise levels are likely to be at their lowest. A minimum measurement period of 3 days is recommended and should preferably include weekdays and weekends. Any "emergency plant" should meet the requirements of this condition. Part (b) Plant noise measurements should be taken near to the plant and the levels at the receptors extrapolated in accordance with good practice.

19. This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.

20. This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law

21. NPPF

In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways: detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available:

A full pre application advice service has been offered.
Where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

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Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 6 May 2025
Our Ref DS/FS25/0025
Your Ref PT_AZT/25/00529/FULEIA
Subject 130 Fenchurch Street London EC3M 5DJ

In response to your request for comments in relation to the submission the District Surveyors Office has the following comments to make:

I have reviewed the submitted information and have no comments.

I consider that policies D5 and D12 have been met.

Outlook

25/00529/FULEIA - 130 Fenchurch Street

From Varma, Vimal <[redacted]>
Date Sun 11/05/2025 11:51 PM
To Thwaites, Alex <[redacted]>
Cc Turner, Lee <[redacted]>

Hi Alex,

The proposed waste storage and collection facilities indicated on Drawings No. 02163-WEA-ZZ-B2-DR-A-0996 Rev P00 and 02163-WEA-ZZ-00-DR-A-0999 Rev P00 and as outlined in the Outline Delivery and Servicing Plan, April 2025, are adequate for this proposal. Therefore, this division, will not raise any objection to this application.

Thanks

Vimal

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 02 May 2025 10:06
To: Varma, Vimal <[redacted]>; Turner, Lee <[redacted]>
Subject: Planning Application Consultation: 25/00529/FULEIA

Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk" PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London

APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 25/00529/FULEIA

Development Management Case Officer: Alex Thwaites

Site Address: 130 Fenchurch Street, London, EC3M 5DJ

Proposal: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Application Received: 2 May 2025

Request for Comment Received: 2 May 2025

Response issued: 12 May 2025

Comment:

Date & Initials

Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Sustainability Statement prepared by ARUP. The Sustainability Statement has directly considered the six City of London climate risks and carried out a climate risk assessment in line with BREEAM Wst 05 (see Appendix A.1).

Overheating

- Design Measures: The building design includes a closed cavity façade (CCF) system with automated internal blinds to manage solar gains.
- Balconies and terraces provide passive solar shading in summer while allowing useful solar gain in winter.
- Thermal Performance: Enhanced building envelope thermal performance targets reduce space heating demand in winter and minimize the risk of summertime overheating.
- Cooling Systems: A free cooling displacement ventilation system is used to satisfy internal cooling demands, system is also designed to operate in high temperatures.
- **Two new street trees proposed which will provide shading / cooling to Fenchurch Street.**

Flooding

- Flood Risk Assessment found the site to be at low risk of flooding from all sources.
- Development's drainage scheme includes blue and green roofing and rainwater harvesting.
- Surface water will be restricted to 2l/s, providing a 96% betterment over existing rates.

Water stress

APPLICATION COMMENT FORM	
• A water storage tank will provide 50% of a full day of fresh water storage for the building. Rainwater and greywater recovery systems are being considered to reduce fresh water demand. • All fixtures and fittings will meet or exceed BREEAM water efficiency standards. • Automatic, sensor driven irrigation system to be included for all planting areas. • Inclusion of drought tolerant plant species. **Biodiversity** • 'Green spiral concept' landscape design will be delivered through layered greening across terraces, linear balconies, vertical greening and two new street trees. • Biodiverse green roof at level 32, sown with UK provenance wildflower seed and native annual species. • Integrated birdboxes to be provided • Development will achieve an UGF of 0.321 and BNG of 3.99 bu/ha. Complying with City Plan policies. **Pests and Diseases** • Consideration given to using non-native species within planting palettes and using reputable sources for imported plant stock and including inspections. • Maintenance plan will include the regular removal of potentially harmful or infected material. • Air intake and exhaust louvres will be provided with bird mesh to prevent animal ingress to ventilation system. Vent pipes and drainage outfall will have traps and screening to prevent animal ingress. • Ventilation system for the building is designed to limit the spread airborne viruses. Open plan offices have underfloor air supply meaning the occupied zone has a higher air quality than mixed system. **Food, trade and infrastructure** • All materials and construction methods have been selected for their durability and ability to withstand impacts such as increased rainfall, wind speeds and temperature fluctuations. • Development is car-free with one accessible space. • Cycle parking and end of trip facilities provided. • Off-site freight consolidation strategy will reduce deliveries by 75% with a future target of 90% **Recommendation:** The proposed development **is** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.	**EB** **12/05/25**

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 09/05/2025
Our Ref DS/ SUDS25/0012
Your Ref PT_AZT/25/00529/FULEIA
Subject 130 Fenchurch Street

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the submitted information for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater harvesting, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 186m^3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [redacted]
Email [redacted]

Date 29 May 2025
Our Ref 25/03199/NPLN
Your Ref 25/00529/FULEIA

Subject 130 Fenchurch Street London EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions are attached to any consent:

(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 worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time 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 shall be taken (unless otherwise agreed in writing by the local planning authority) 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 ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.

INFORMATIVE : Part (a) “noise sensitive premises” includes commercial properties such as offices. Part of the rationale for the 10dB below background is the prevention of ambient creep i.e. the gradual increase in background noise levels due to successive small incremental changes. This has become more important with the increasing uptake of electric vehicles and other quieter forms of transport in recent years. With this trend likely to continue plant noise will become the dominant noise source in highly built-up areas such as the City of London. It is, therefore, important to maintain or improve the general acoustic environment in order to minimise adverse noise impacts on residents, workers and visitors in the area. The lowest typical background noise level should be determined on a case by case basis with due regard to BS4142 and other relevant standards. Justification for the method of determination of the lowest typical background noise level should be provided. Background noise levels should be determined over a period of time when it would be anticipated that noise levels are likely to be at their lowest. A minimum measurement period of 3 days is recommended and should preferably include weekdays and weekends. Any “emergency plant” should meet the requirements of this condition. Part (b) Plant noise measurements should be taken near to the plant and the levels at the receptors extrapolated in accordance with good practice.

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall

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

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

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

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

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen use. Flues must

terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

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

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

Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's

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

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

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

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

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above 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.

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen use. Flues must

terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8.

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

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

The external terraces hereby permitted shall not be used or accessed between the hours of 22:00 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.

No amplified or other music shall be played on the terraces.

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

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the

work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

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

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

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in

accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

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

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

Regards

[redacted]

Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: [redacted]

Outlook

Re: Pre-application advice at 130 Fenchurch (25/00529/FULEIA)

From Claire Giraud <[redacted]>
Date Fri 11/07/2025 12:27 PM
To Thwaites, Alex <[redacted]>
Cc claire.giraud <[redacted]>; Nutt, Lydia <[redacted]>

THIS IS AN EXTERNAL EMAIL

Dear Alex

thanks for this, I am exceedingly pleased with the changes, I now think this is safe and I really to thank you for your excellent work on this.

Kind Regards

Claire Giraud

Senior Public Health Practitioner

Disclaimers apply, for full details see: https://hackney.gov.uk/email-disclaimer

On Fri, 11 Jul 2025 at 11:52, Thwaites, Alex <[redacted]> wrote:

> Hi Claire,
>
> As discussed please see attached.
>
> Thanks,
>
> Alex

Alex Thwaites MRTPI | Principal Planning Officer

Environment Department | City of London | Guildhall | London EC2V 7HH

[redacted] | www.cityoflondon.gov.uk

> From: Claire Giraud <[redacted]>
> Sent: 11 June 2025 3:26 PM

Outlook

RE: 130 Fen - Public Realm Officer Comments 25/00529/FULEIA

From Roebuck, Alex <[redacted]>
Date Mon 14/07/2025 3:49 PM
To Thwaites, Alex <[redacted]>

Hi Alex, thanks for this. Yes some concerns do remain about the removal of the tree. Likewise happy to chat with you in the first instance or we could speak to the applicant directly to understand the reason for removal if you are happy to put us in touch.

Thanks
Alex

Alex Roebuck
Arboricultural Projects Officer |Gardens and Cleansing
City of London | Environment Department | Guildhall |
London | EC2P 2EJ
[redacted]

From: Thwaites, Alex <[redacted]>
Sent: 11 July 2025 09:00
To: Roebuck, Alex <[redacted]>
Subject: Fw: 130 Fen - Public Realm Officer Comments 25/00529/FULEIA

Hi Alex,

Hope you are well.
Please see below and attached. Happy to have a chat about this if there are still concerns.

Thanks,

Alex

Alex Thwaites MRTPI | Principal Planning Officer
Environment Department | City of London | Guildhall | London EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

From: Liam Lawson Jones <[redacted]>
Sent: 10 July 2025 9:30 AM
To: Thwaites, Alex <[redacted]>; Charlotte Allen <[redacted]>
Subject: RE: 130 Fen - Public Realm Officer Comments

CITY OF LONDON CORPORATION
TRANSPORT COMMENTS

Application reference: 25/00529/FULEIA	**Address:** 130 Fenchurch Street	**Date**: 16/07/2025

Proposal: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

More info needed	**No Objection**	**No objection STC**	**Concerns Raised**	**Objection**
	X			

Initial Observations		**Transport Officer:**	**DM Officer:**
Full Observations	**x**	Taluana Patricio	Alex Thwaites

Highways and Transportation

Surrounding Highway Network, Site Accessibility and Proposed Development

The site is situated on the southern edge of the City Cluster, within a designated tall building zone. It is bordered by Fen Court Garden to the north, Fen Court to the east, Fenchurch Street to the south, and Cullum Street to the west. Along its northern boundary, the site shares a party wall with adjacent properties within the Lime Street Estate and 34 Lime Street.

Fenchurch Street serves as an important east-west thoroughfare, connecting Aldgate in the east with Gracechurch Street to the west. Gracechurch Street, in turn, functions as a key north-south route within the local area. The site benefits from excellent public transport accessibility,

with numerous bus stops, underground, and mainline train stations nearby. Additionally, a network of pedestrianised streets and alleyways provides convenient shortcuts and links to surrounding urban amenities.

The existing site comprises an office development of approximately 13,957 sqm (GIA), including ancillary retail space at ground floor level. It also features a basement car park with 20 spaces and servicing facilities, accessed via Cullum Street. In 2019, planning permission (reference: 16/00809/FULMAJ) was granted for a redevelopment scheme, although this consent lapsed in 2022. The approved proposal included around 36,500 sqm (GIA) of office space (Use Class E(g)(i)) and approximately 450 sqm (GIA) of retail space (Use Class E). The scheme incorporated a ground floor service yard accessed from Cullum Street, where—due to the street's constrained layout and in line with existing conditions—servicing vehicles would have been required to reverse into the yard.

Comparison of Existing and Proposed GIA

Use Type	Existing GIA (sqm)	Proposed GIA (sqm)
Office (Class E9(g))	13,957	57,491
Culture (Class F1/E)	n/a	569
Public viewing gallery (Sui Generis)	n/a	644
Flexible Retail	n/a	370
Retail (Ancillary)	Included in office	450
Plant		10,480
Total	13,957	69,553

The Proposed Development will demolish all existing buildings and structures to redevelop the site and provide a total floor area of 69,553sqm GIA, comprising 57,491sqm office floor space.

Trip Generation - Pedestrians

The trip generation methodology has been developed using a combined data from Census and the TRICS database, supplemented by manual adjustments to mode share distributions. The existing site, including the ground floor retail unit, has been assessed as employment-generating floorspace. It is assumed that trips associated with the retail component primarily consist of incidental pedestrian visits.

Mode share data for all journey purposes during the AM and PM peak periods has been extracted from TRICS for office-related arrivals and departures. To ensure the methodology reflects local travel behaviour and public transport accessibility, the TRICS-derived mode shares have been adjusted using data from the 2011 Census 'Method of Travel to Work' dataset. This approach is consistent with methodologies adopted in previously approved developments within the area, thereby ensuring continuity and comparability in the assessment process.

The adjustment of transport mode shares was based on Census data for the City of London 001 MSOA. Rail-based trips were split into 41% London Underground and 59% National Rail. Bus, cycling, and walking shares remained as per TRICS data. All other modes were proportionally adjusted using Census data to better reflect local travel patterns. Peak period trip rates are detailed in Table 6-4 of the transport assessment.

Table 6-4: Existing site Total Person Trip Rates (per 100sqm) and Total Person Trips (13,957sqm GIA)

TIME	TOTAL PERSON TRIP RATES			TOTAL PERSON TRIPS		
	ARRIVALS	DEPARTURES	TOTAL	ARRIVALS	DEPARTURES	TOTAL
AM Peak	3.3	0.4	3.6	455	49	504
PM Peak	0.2	2.8	3.1	536	62	598
Daily Total	**11.1**	**11.0**	**22.1**	**1,555**	**1,532**	**3,087**

The proposed development is expected to increase pedestrian activity along the adjacent footways. To ensure a robust and methodologically sound assessment, the analysis has been based on the net trip generation figures presented in Table 4-4 as shown below and extracted from the transport assessment. This approach focuses on the net change in pedestrian movements rather than the total number of trips, providing a more accurate reflection of the development's potential impact on the pedestrian network.

During the morning peak period, the development is projected to generate approximately 2,445 total additional trips, of which 1,941 are net new pedestrian movements. These figures include trips made on foot, including those accessing nearby public transport facilities.

Trip distribution across the local pedestrian network has been determined using origin-destination data from the Census.

The projected office travel demand was estimated using the same total person trip rates applied in the assessment of the existing conditions. The forecast number of employee and visitor trips associated with the office use is presented in Table 6-9, as extracted from the submitted Transport Assessment.

Due to the small scale of the retail unit, it is anticipated that it will primarily attract pass-by pedestrian trips, and as such, has not been assessed in detail. This approach has been considered acceptable.

The public space is expected to operate with varied opening hours. However, it is not anticipated to generate significant demand during traditional peak periods. Most visitors are expected during evenings and weekends, with travel predominantly by sustainable modes.

Table 4-4: Forecast Development Pedestrian Trips by Mode - AM Peak (08:00 – 09:00)

MODE OF TRAVEL	AM 0800-0900			PM 17:00 -18:00		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Underground, metro, light rail or tram	557	12	569	442	10	452
Train	813	18	832	639	14	653
Bus, minibus or coach	245	5	250	194	4	198
Taxi	7	1	8	5	1	6
Motorcycle, scooter or moped	0	0	0	-4	-1	-4
Driving a car or van	0	0	0	-5	-1	-6
Passenger in a car or van	0	0	0	-1	0	-1
Bicycle	298	14	312	253	14	267
On foot	287	188	475	228	148	376
Total	**2206**	**239**	**2445**	**1751**	**190**	**1941**

Table 6-9: Forecast Total Trips (67,694sqm (GIA))

TIME PERIOD	ARRIVALS	DEPARTURES	TOTAL
AM Peak (08:00 – 09:00)	2,206	239	2,445
PM Peak (1700 – 1800)	137	1,929	2,066

Pedestrian Comfort Levels (Pedestrian Footway Assessment)

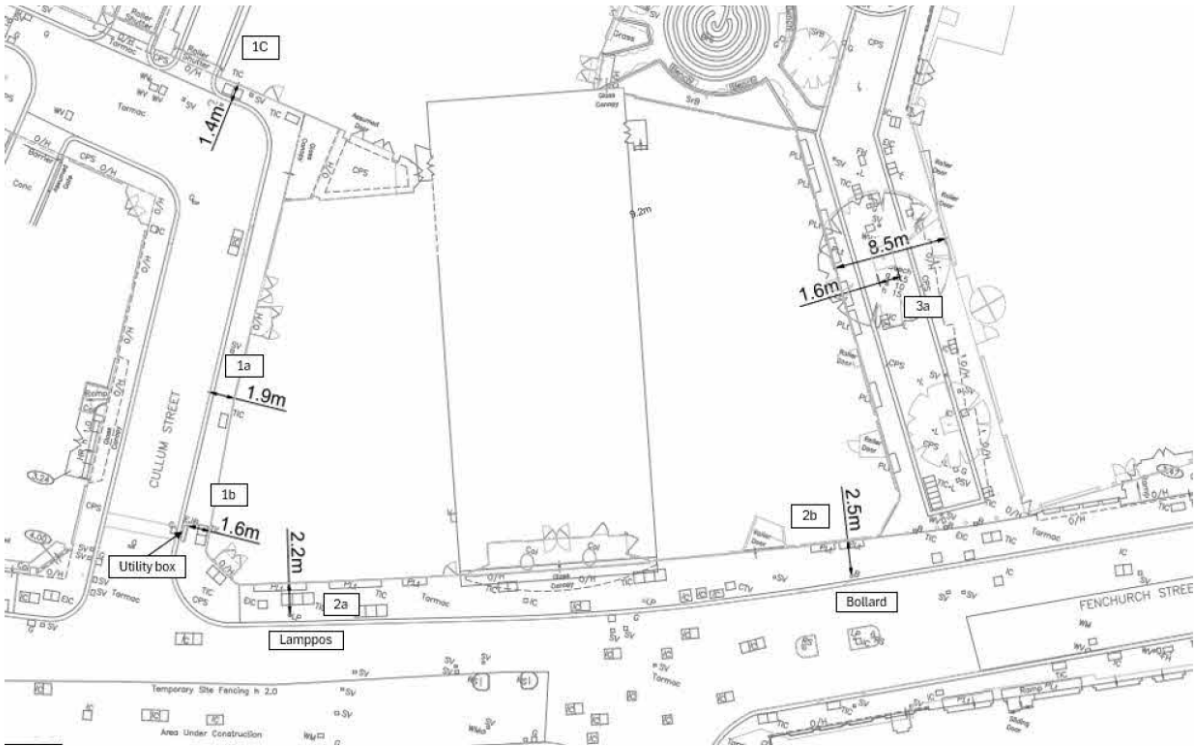
Pedestrian Comfort Level (PCL) is a measure used to assess how comfortable and safe a pedestrian environment is, particularly in terms of space and flow. It is commonly used to evaluate footway conditions and ensure they meet the needs of pedestrians.

PCL levels range from A to E, representing varying degrees of suitability for pedestrian movement. These levels are categorised as: comfortable, acceptable, at risk, and unacceptable/uncomfortable.

The PCL assessment was included within a comprehensive section of the transport assessment, to determine the existing and proposed comfort levels in the vicinity of the development. The assessment followed Transport for London's (TfL) guidance document Pedestrian Comfort Level Guidance v2 (2019).

The figure below (extract of the transport assessment) shows the PCL assessment locations and associated footway widths for the existing situation.

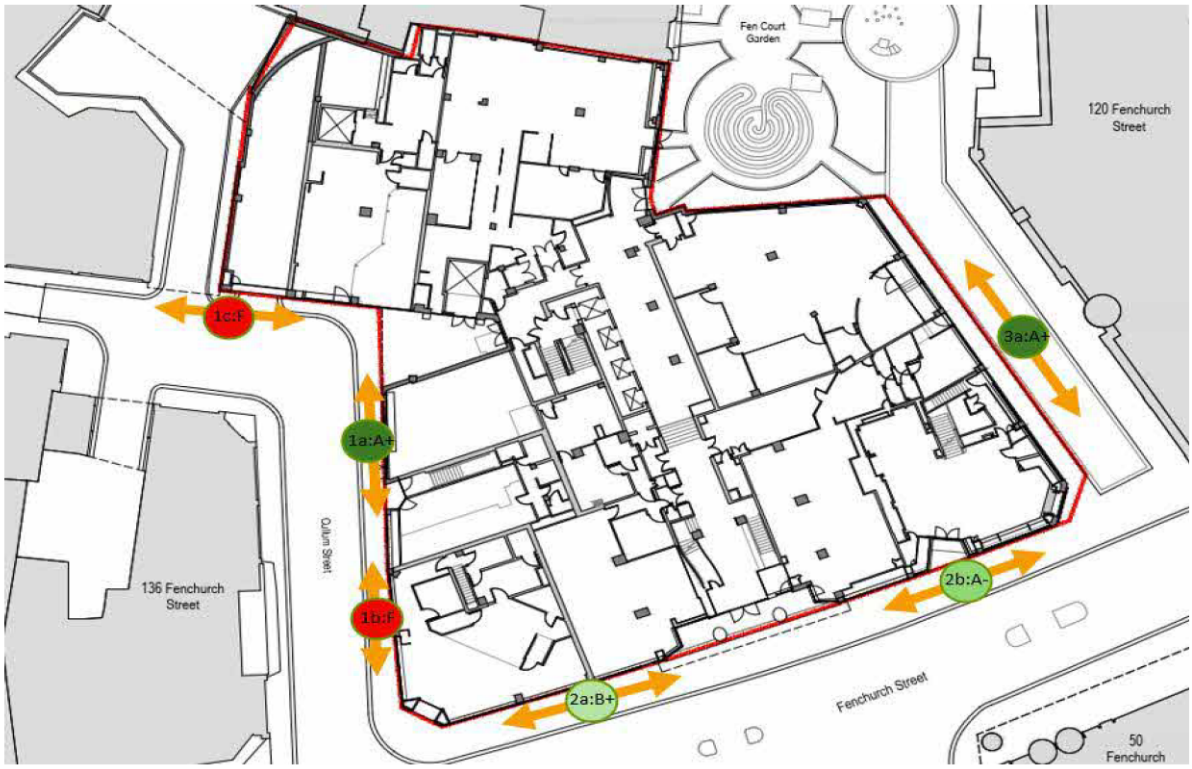
Figure 4-1: Footway Assessment Locations and Existing Widths



Footway widths were surveyed at four strategic points around the site, capturing both standard dimensions and any pinch points where relevant. These measurements reflect the current building lines and the full extent of the footway, as shown in the table below and on table 4.6 from the transport assessment.

Location	Existing Width	PCL Width	AM Peak Flow	AM Peak Crowding	AM Peak PCL	Lunchtime Peak Flow	Lunchtime Peak Crowding	Lunchtime Peak PCL	PM Peak Flow	PM Peak Crowding	PM Peak PCL
1a	1.9	1.5	256	2.8	A+	379	4.2	A	215	2.4	A+
1b	1.6	1.2	256	3.6	F	379	5.3	F	215	3	F
1c	1.4	1	256	4.3	F	379	6.3	F	215	3.6	F
2a	2.2	1.8	1052	9.7	B+	1066	9.9	B+	1092	10.1	B+
2b	2.5	2.1	1052	8.3	A-	1066	8.5	A-	1092	8.7	A-
3a	6.9	6.1	830	2.3	A+	822	2.2	A+	741	2	A+

Figure 4-6: 2024 Base Pedestrian Flows Diagram



In the existing scenario (as shown above), all footways, except for the pinch point on the eastern side of Cullum Street (sections 1b and 1c), achieve a Pedestrian Comfort Level (PCL) of C+ or higher. However, Cullum Street (1b, 1c) consistently records a PCL of F across all time periods due to congestion caused by the pinch point. Fenchurch Street (sections 2a and 2b) maintains a PCL of B+ to A-, indicating moderate pedestrian volumes. Meanwhile, Fen Court (4a) achieves a PCL of A+ throughout the day, reflecting a high level of pedestrian comfort.

In the proposed (2040 baseline) scenario, all footways—except the eastern side of Cullum Street (1b, 1c)—achieve a Pedestrian Comfort Level (PCL) of C+ or higher. Cullum Street continues to experience a PCL of F due to congestion at a pinch point. Fenchurch Street (2a, 2b) sees increased pedestrian flows but maintains a PCL of B+, while Fen Court (3a) consistently achieves A+. Overall, pedestrian flows rise across all locations compared to 2024, but comfort levels remain stable, with Cullum Street being the only area with poor performance. See below extract diagrams of the transport assessments.

Figure 4-8: Future Footway Widths

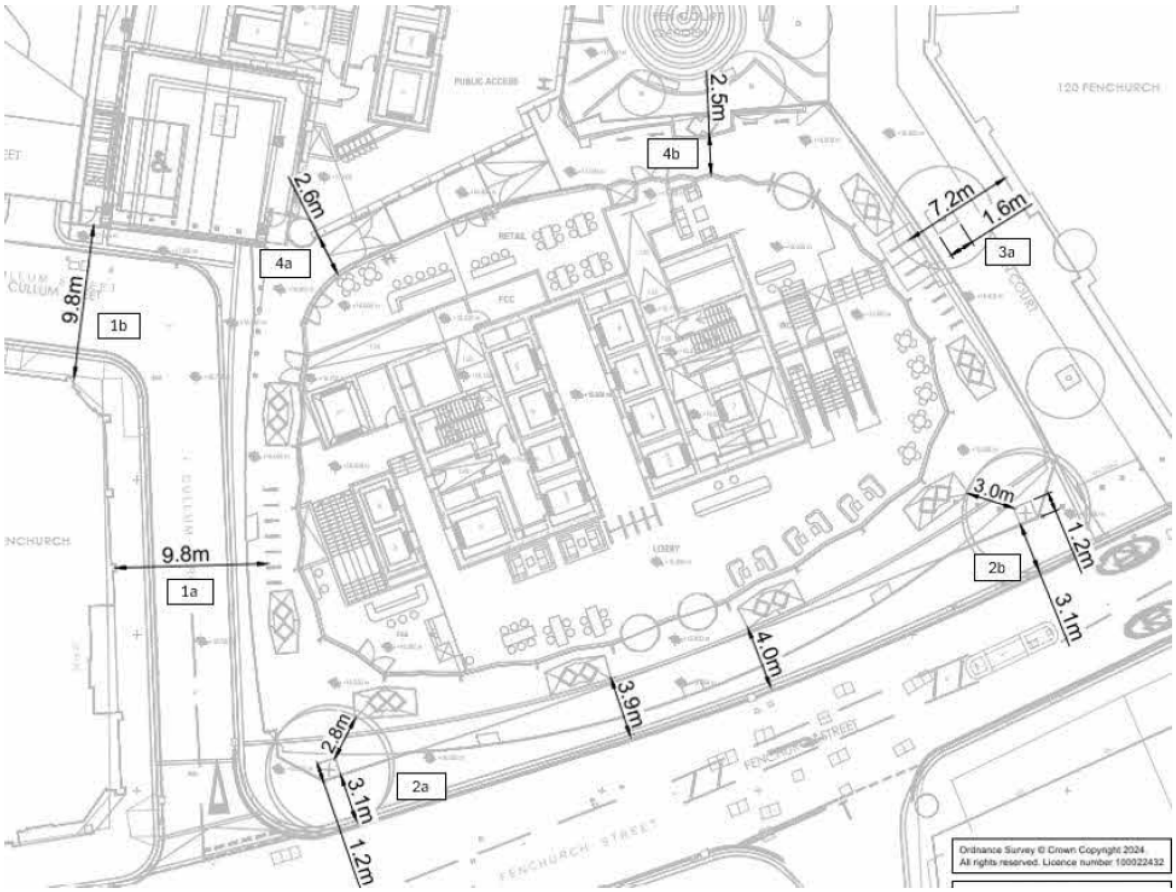
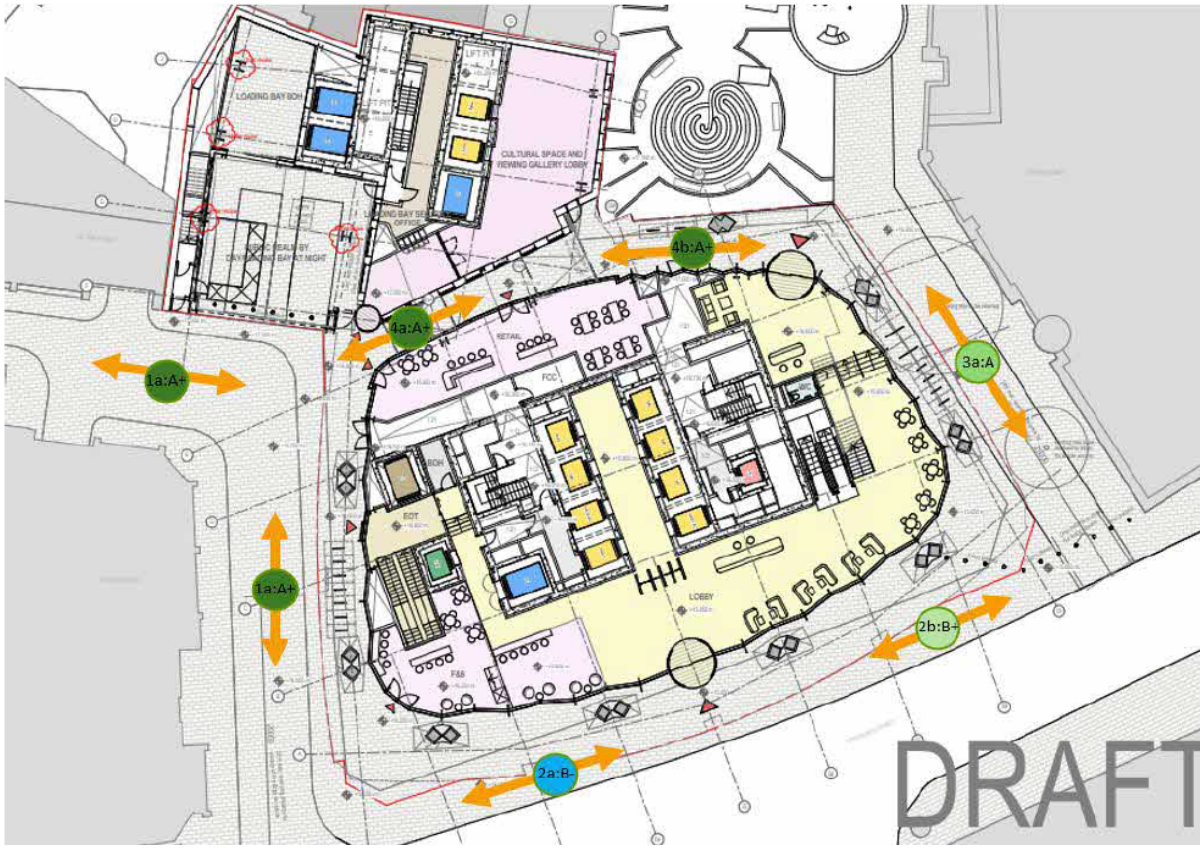


Figure 4-9: 2040 Base Pedestrian Flows Diagram



The Proposed Development will transform Cullum Street into a raised shared space designed to accommodate all road users, enhancing both accessibility and the pedestrian experience. It will also create a pedestrian-only link between Cullum Street and Fen Court, along with improvements to Fenchurch Street. The footways fronting the site will benefit from increased width, incorporating both public highway and private areas. Figure 4-8 illustrates the proposed future footway widths.

These improvements will be delivered as part of a Section 278/38 Agreements and are designed to mitigate pedestrian impacts while significantly enhancing walking conditions in the surrounding area. They also support broader transport sustainability objectives by improving the quality of the pedestrian environment around the site.

Below are the proposed PCLs (extract of the transport assessment) following the highway improvement works.

Table 4-5: Future Base 2040 with Development – PCL Footway Assessment

PCL PARAMETERS			AM PEAK			LUNCHTIME PEAK			PM PEAK		
Location	Existing Width	PCL width	PCL Flow	Crowding	PCL	PCL Flow	Crowding	PCL	PCL Flow	Crowding	PCL
1a	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
1b	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
1c	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
2a	3.1	2.7	2452	15.1	B-	1780	11.0	B+	2310	14.3	B-
2b	3.1	2.7	1561	9.6	B+	1366	8.4	A-	1548	9.6	B+
3a	5.6	4.8	1258	4.4	A	1069	3.7	A	1111	3.9	A
4a	2.6	2.2	245	1.9	A+	178	1.3	A+	231	1.8	A+
4b	2.5	2.1	245	1.9	A+	178	1.4	A+	231	1.8	A+

Table 4-6: Base 2024 vs Future Base 2040 with Development – Comparison

BASE 2024				FUTURE BASE 2040			
1a	A+	A	A+	1a	A+	A+	A+
1b	F	F	F	1b	A+	A+	A+
1c	F	F	F	1c	A+	A+	A+
2a	B+	B+	B+	2a	B-	B+	B-
2b	A-	A-	A-	2b	B+	A-	B+
3a	A+	A+	A+	3a	A	A	A
N/a	.	.	.	4a	A+	A+	A+
N/a	.	.	.	4b	A+	A+	A+

The proposals are considered acceptable as they align with the current transport strategy objectives by supporting the creation of a high-quality public realm that is inclusive, accessible, and enhances the experience of walking, cycling, and wheeling. Complementing this, Policy CS16 focuses on improving public transport, streets, and walkways by enhancing the public realm to support pedestrian movement and safety, including the development of new pedestrian routes.

Trip Generation – Servicing and Delivery

Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions. Refuse and recycling vehicle trips to be made outside of peak hours: 7:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00. Depending on the proposals evening servicing can be considered.

The existing sites comprises an office development of approximately 13,957 sqm (GIA) with ancillary retail accommodation at ground floor level. The existing site has a basement car park with 20 spaces and basement servicing facilities, with access taken from Cullum Street.

The Proposed Development will demolish all existing buildings and structures to redevelop the site and provide a total floor area of 69,553sqm GIA, comprising 57,491sqm office floor space.

The CoL Loading Bay Ready Reckoner tool has been used to estimate the daily number of servicing vehicles that the Proposed Development may generate, and in the absence of survey data for the existing site, the same tool has also been applied to assess the current office development.

Servicing rates based on CoL parameters: 0.22 trips per 100 sqm per day for office use and 1.35 trips per 100 sqm per day for retail use have been applied to the Proposed Development's floorspace, with elevated public spaces assessed using retail rates.

This development includes an initial proposal for 50% consolidation, capped at 99 vehicles per day (net change of 68 one-way trips). The aim is to reduce deliveries by 75%, with a future target of 90% consolidation, as achieved in similar City of London schemes.

This strategy involves combining multiple deliveries and collections into fewer, larger movements to enhance efficiency and reduce environmental impact, contrasting with the current unconsolidated delivery approach at the site.

The current servicing strategy allows unrestricted vehicle access via Cullum Street to a basement car park and servicing area, with deliveries occurring throughout the day and no consolidation measures in place.

The proposed strategy introduces off-site freight consolidation in line with City of London (CoL) policy, aiming to reduce delivery volumes by 75%, with a future target of 90%, as achieved in similar schemes.

All deliveries, except those made by cargo bikes, will be restricted to overnight hours (11 pm–7 am) to minimise conflicts with pedestrians and cyclists. Deliveries and servicing will be pre-booked, and personal deliveries will not be permitted. During the day, the area will be served by a Blue Badge bay, managed by a facilities management

company. The bay's management details will be secured through the Section 106 Agreement.

During the day, cargo bikes can use the servicing yard as seen in the below image and extracted from the transport assessment. Vehicle access will be limited to an 8m rigid lorry, which must reverse into the site, while smaller vehicles like Transit Vans can manoeuvre in forward gear.

Figure 5-1: Proposed Servicing Arrangement



The Proposed Development will include two dedicated loading bays within the service yard, designed to meet servicing needs while allowing safe vehicle manoeuvring and forward egress onto Cullum Street, as confirmed by swept path analysis. A Road Safety Audit of both the Cullum Street improvements and servicing strategy raised no safety concerns.

If planning permission is granted, a Delivery and Servicing Management Plan (DSMP) will be secured through the Section 106 Agreement and monitored for five years. To avoid conflicts with delivery and servicing activities and to comply with the permitted hours of use, it is recommended that refuse and recycling collections be integrated into the same system that manages delivery and servicing slots.

The allocated slots for refuse and recycling can be reviewed periodically to suit different parts of the development, but any changes must be agreed upon in advance by all parties occupying the site. This approach ensures that the loading and parking area is managed within designated times and accommodates varying operational needs. Further details regarding refuse and recycling arrangements, such as

identifying collection points without interfering with other building activities, will be secured as part of the DSMP via a Section 106 obligation.

These proposals comply with the City of London Local Plan 2015, specifically Core Strategic Policy CS16 and Development Management Policies DM16.5 and DM16.6, which promote sustainable, coordinated, and conflict-free servicing strategies.

Cycle Parking

The existing site currently lacks any dedicated cycle parking, including both long and short stay spaces.

The Proposed Development will deliver a total of 860 long stay and 48 short stay cycle parking spaces.

The long stay provision, located at basement level 1, includes a mix of 43 accessible spaces (5%), 43 Sheffield stands (5%), 648 two-tier racks (75%), 39 vertical racks (5%), and 88 active travel lockers (10%). This provision exceeds the 19% mode share requirement, ensuring compliance with current policy.

To further support active travel, high-quality end-of-trip facilities will be provided, including lockers, showers, and changing rooms, with a ratio of one shower/changing room per 12 cycle spaces.

The layout of the cycle parking at basement mezzanine 01 and the end-of-trip facilities at basement level 1 are illustrated in Figures 3-16 and 3-17 below (extract from the transport assessment), respectively.

In accordance with the London Plan, a total of 48 short-stay cycle parking spaces are required. The proposal includes 30 short-stay spaces (provided via 15 Sheffield stands) and four accessible spaces (via two enlarged Sheffield stands) within the site boundary. Additionally, 18 active travel lockers for visitors will be installed adjacent to the public area accessed from Cullum Street. This is shown in Figure 3.18, circled in red. The racks are located within private areas and not on the public highway.

Figure 3-16: Basement Mezzanine- 1 Cycle Parking

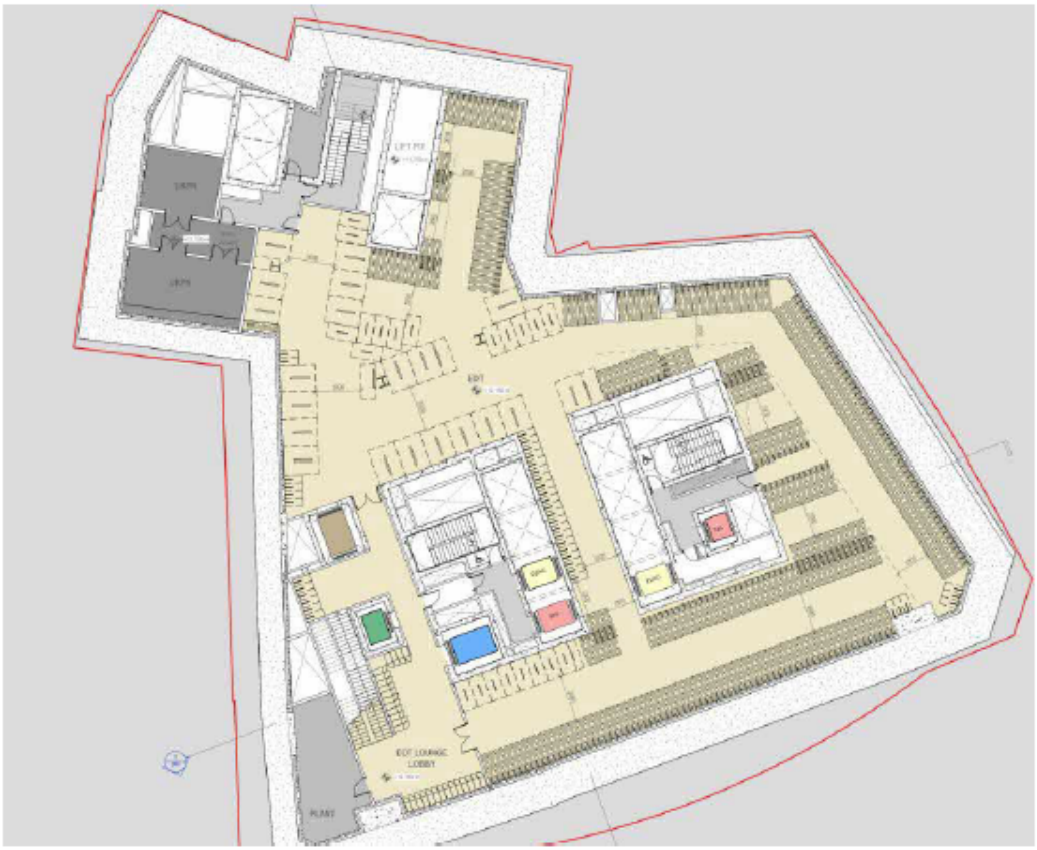
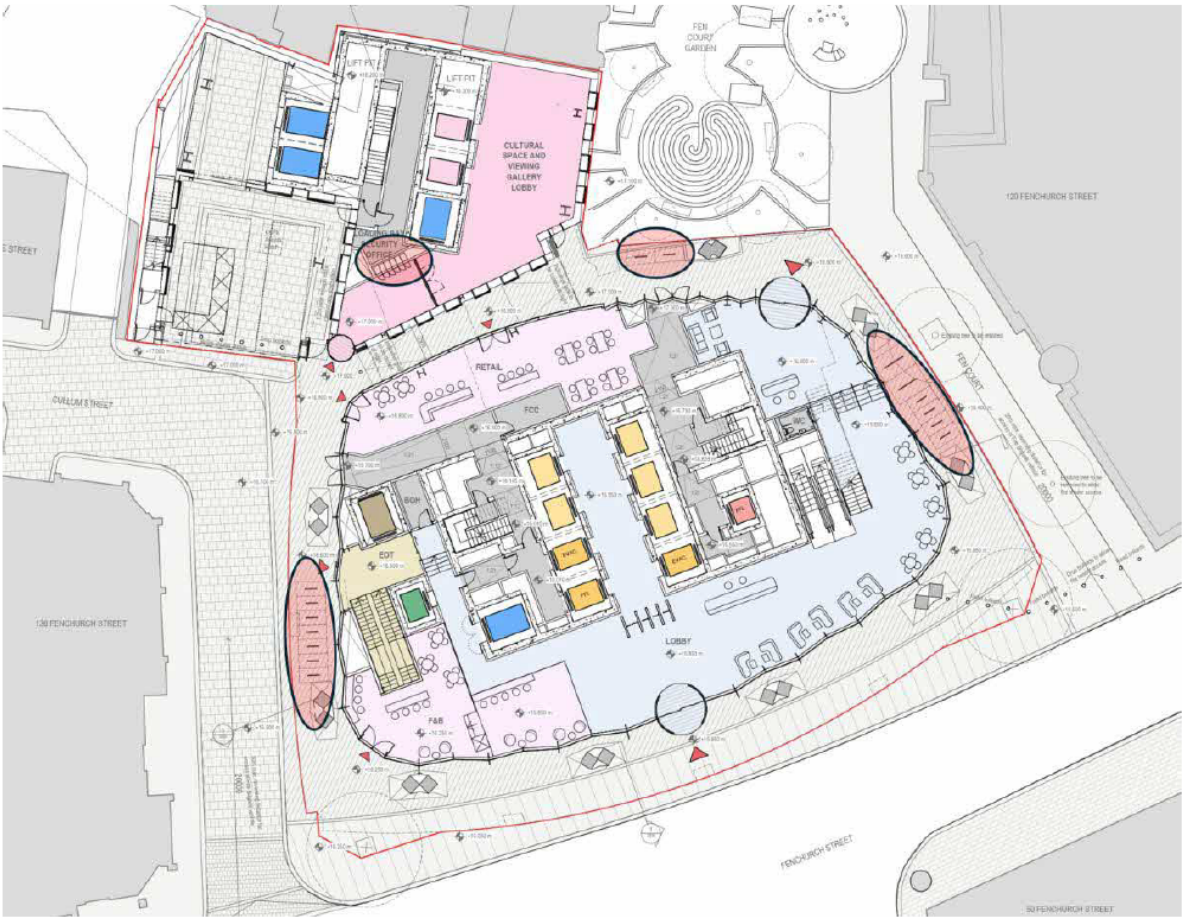


Figure 3-17: Basement 01 - End-of-Trip Facilities



Figure 3-18: Short-Stay Cycle Parking



Car Parking (Blue Badge)

The basement car park and servicing yard, accessed via Cullum Street, provides 20 car parking spaces. The entire City of London is designated as a Controlled Parking Zone (CPZ), with restrictions in place from Monday to Friday between 07:00 and 19:00, and on Saturdays from 07:00 to 11:00; no restrictions apply on Sundays. Along Fenchurch Street, double yellow lines prohibit parking, and intermittent single and double yellow kerb markings further restrict stopping and loading. Disabled parking bays are available on Mincing Lane, approximately 150 metres south of the site, and on London Street, around 200 metres to the east. These bays permit parking for up to four hours on weekdays, with no time limits on weekends, as shown in figure below.

Figure 3-20: Proposed Blue Badge Bay



The Proposed Development will be car-free except for one accessible parking bay located within the servicing yard accessed via Cullum Street, in accordance with the requirements of the London Plan.

The accessible parking space will be available for use between the hours of 07:00 to 23:00 when servicing is not taking place and will be privately managed, being available for building users only.

Based on the above, the current approach to car parking is supported and based on encouraging sustainable travel choices and improving access for those with mobility needs. This is in accordance with Policy VT3 of the Draft City Plan 2040.

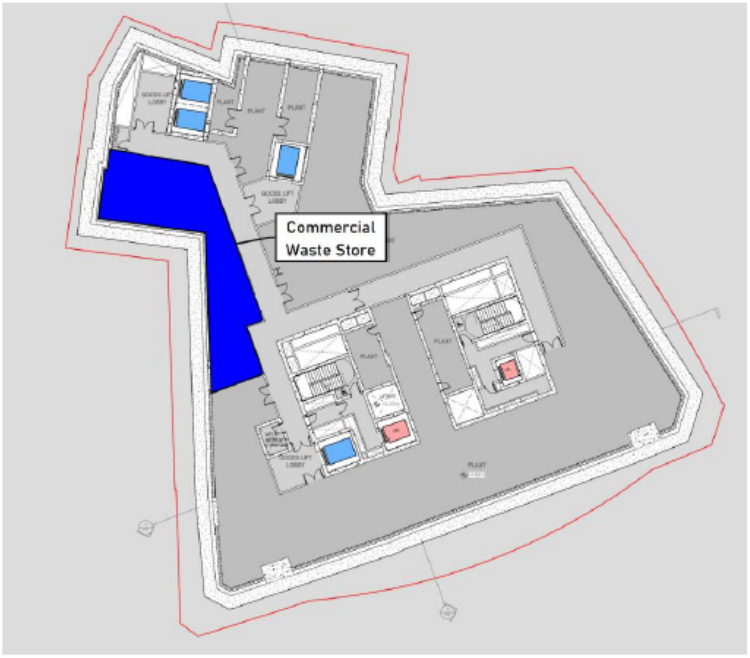
Refuse Management/Waste Strategy

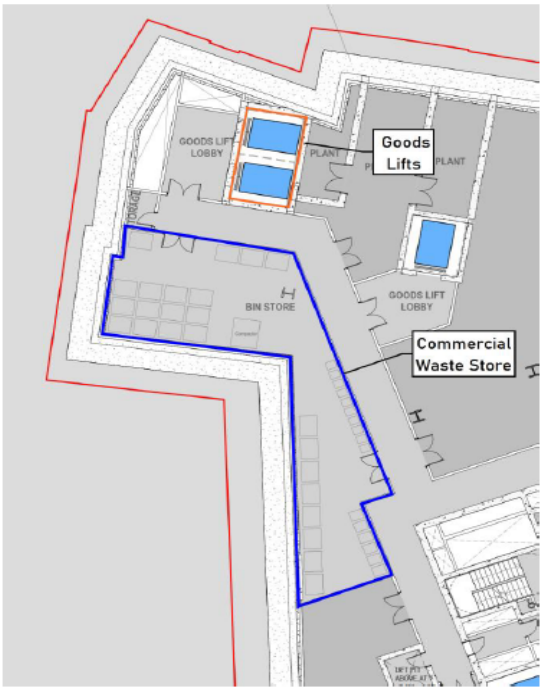
The waste storage area for the proposed development will be located in the basement and brought up to ground floor level for collection during overnight servicing hours (23:00–07:00), in accordance with the servicing strategy. Waste collection will be managed through the Operational Waste Management Strategy (OWMS) submitted as part of the planning application. Waste collection vehicles will access the dedicated service yard via Cullum Street.

The proposed commercial waste management strategy aims to deliver a high-quality service to tenants while complying with relevant guidance. All waste storage and presentation facilities will be designed in accordance with British Standard BS5906:2005, incorporating features such as a nearby water point for wash-down, sealed and easy-to-clean surfaces, a suitable floor drain, and adequate lighting and ventilation. Commercial tenants will maintain temporary internal waste storage areas to enable segregation at source.

In office areas, an on-site Facilities Management (FM) contractor will collect segregated waste using appropriate trolleys and transport it via service lifts and corridors to the commercial

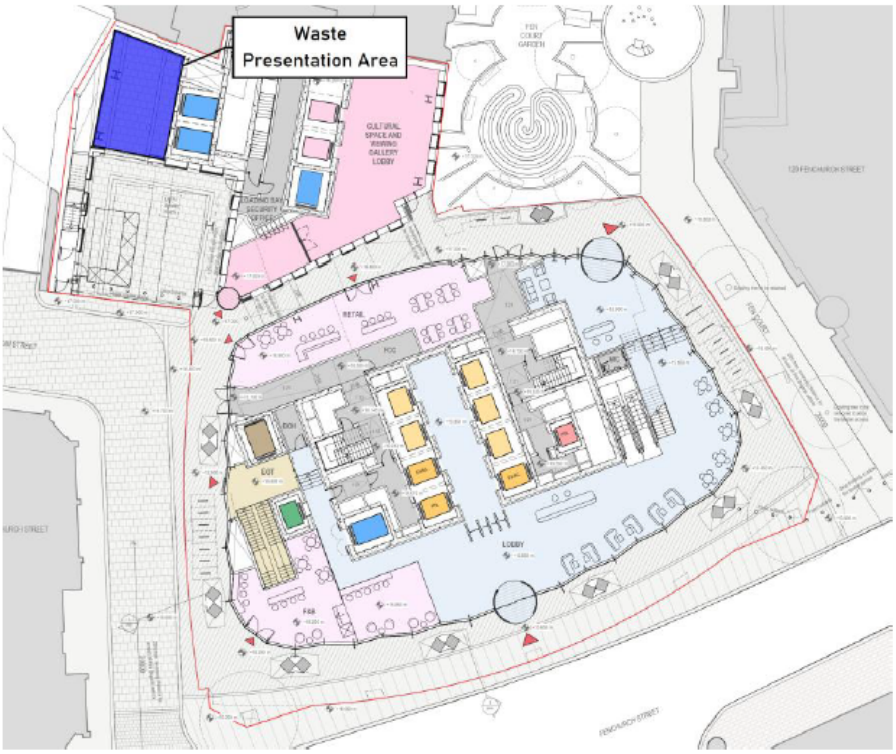
waste store at Basement Level 01. Retail tenants will transfer their segregated waste to the same store outside of peak hours. A dedicated commercial waste store is located at Basement Level 02, where all residual waste, dry mixed recyclables (DMR), food waste, and glass waste generated within the development will be stored prior to collection. The location of this store and its configuration is illustrated in the figure below. The proposals have been agreed upon with the City of London.





The Proposed Development will have separate waste streams collected multiple times weekly by a licensed contractor. The on-site facilities management (FM) team will use service lifts to move bins from the basement to a designated ground-level presentation area near the loading bays. Two goods lifts ensure reliability during maintenance or breakdowns. Waste will be presented in timed windows within approved servicing hours, without placing bins on public

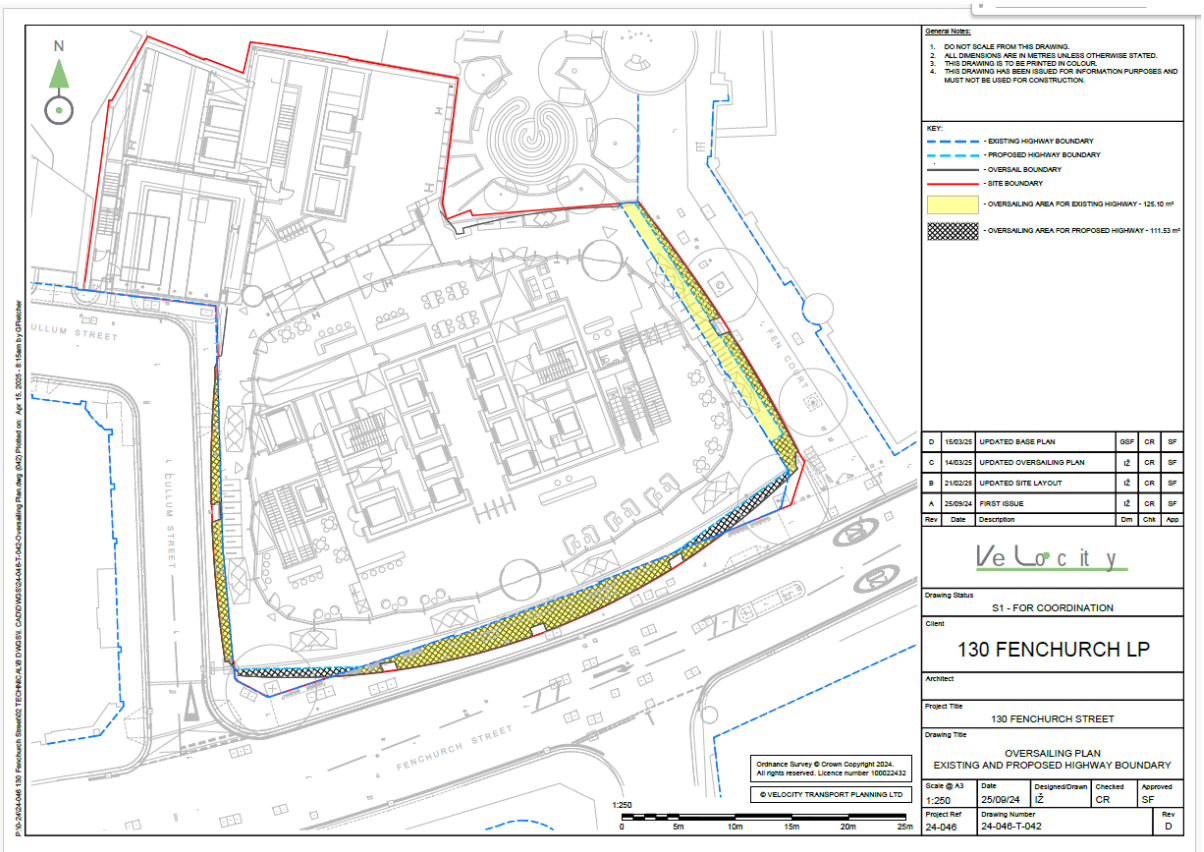
highways. Collection vehicles, no longer than 8 metres, will access the site via Cullum Street. The route for moving bins will comply with BS5906:2005 standards. After collection, bins will be returned to the basement by the FM team.



Oversailing/Undersailing

Structures that permanently oversail the public highway must be licensed by the local authority, typically in accordance with Sections 177 and 179 of the Highways Act 1980.

This development proposes both oversailing and undersailing, which are subject to the licences mentioned above, as referenced in Drawing No. 24-046-T-042.



Highway Boundary - Stopping Up and Adoption

As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders. The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent.

Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so to enable development to be carried out. That process would be carried out under separate procedures from the considerations of the applications currently before you.

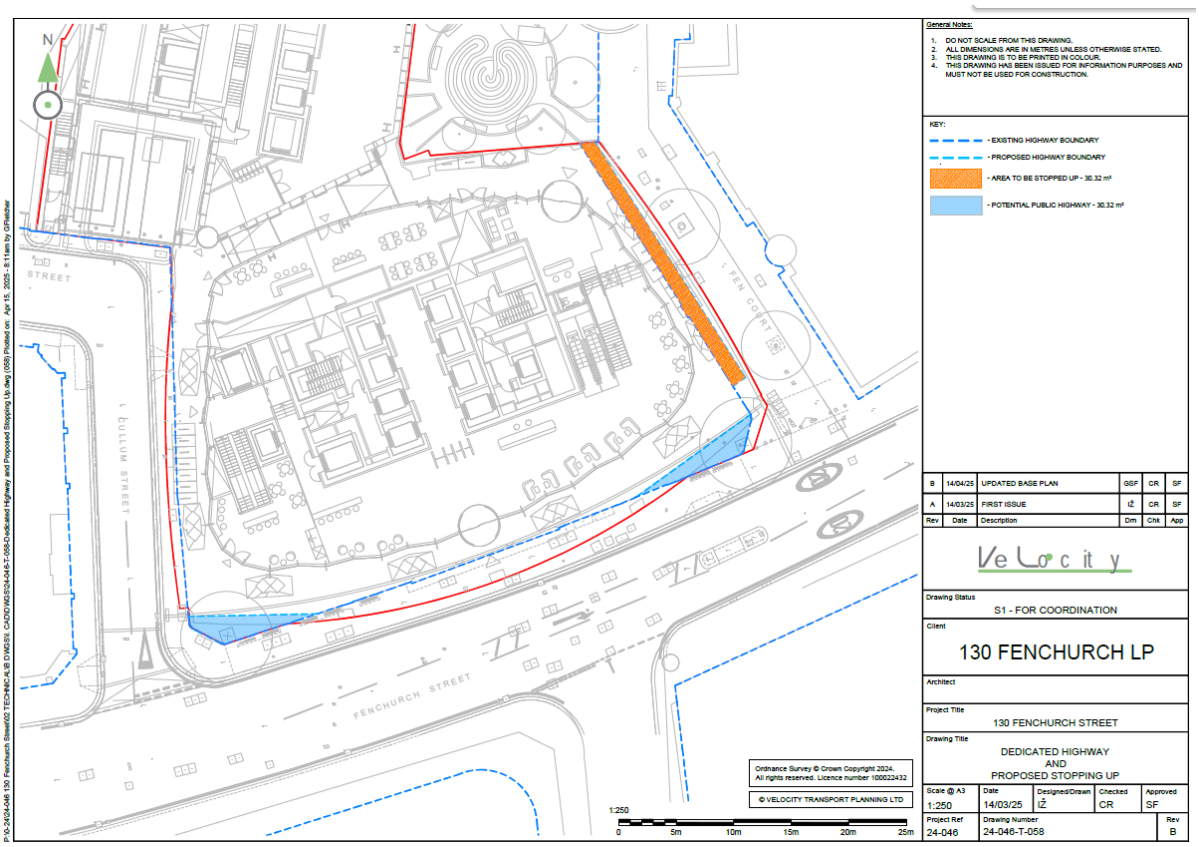
Areas of privately owned land can alternatively be ‘offered up’ for adoption as public highway, for instance, for the creation of a new ‘estate road’ to be adopted and maintained by the local authority.

The submitted application includes proposals (Dwg No. 24-046-T-058) to stop up a section of the public highway located within the site boundary. The area in question encompasses the footprint of structural columns that would be positioned within the public highway and has been extended to establish a more coherent and rationalised highway boundary along Fen Court.

To compensate for the loss of public highway, two areas along Fenchurch Street are proposed for adoption, ensuring that the total area dedicated to public highway remains equivalent to the land being stopped up. In addition, the proposals will deliver a significant increase in

permissive path, enhancing pedestrian connectivity and contributing to wider public realm improvements.

The area proposed to be stopped up on Fen Court measures 30.32 sqm, with an equivalent area to be re-dedicated as public highway. Furthermore, 315.95 sqm will be provided as permissive path—privately owned land that will remain accessible to the public.



Highways Works - Section 278/38 Agreements

The proposed public realm enhancements surrounding the site aim to improve pedestrian experience and connectivity through widened footpaths, the introduction of two new street trees along Fenchurch Street, and the provision of short-stay cycle parking.

The building line along Fenchurch Street will be set back to create a broader public realm, including a new permissive path. A new pedestrian route is proposed between Cullum Street and Fen Court, offering a more direct connection and easing foot traffic on Fenchurch Street; this route will be closed overnight between 23:00 and 07:00.

Cullum Street will feature a shared surface treatment to prioritise pedestrians during the day while accommodating servicing needs at night. The service yard will serve as a multifunctional space, supporting accessible parking, managed by the facilities team under an Accessible Parking Management Plan, and overnight servicing.

These improvements are expected to enhance pedestrian comfort along both Cullum Street and Fenchurch Street. The development aligns with Healthy Streets principles by offering shade and shelter, places to rest, and engaging public features, ultimately delivering a significant upgrade for current and future non-motorised users.

As part of the City's Transport Strategy Delivery Plan for 2025/26 to 2030/31, a Healthy Streets Plan is currently being developed for the area surrounding Fenchurch Street Station. This plan includes proposed upgrades and extends south to the River Thames, encompassing Eastcheap and the Monument junction.

It will provide a framework for public realm enhancements and traffic management to support the wider Transport Strategy. These initiatives form part of a rolling programme of small-scale interventions at targeted locations across the City. Over the course of a three-year period, raised carriageways will be introduced on side streets in this area to reduce road danger, improve accessibility, and enhance the walking and cycling experience. Additional schemes will be developed as the programme progresses.

This development will contribute towards the vision above, via a Section 278 scheme for highway improvement works related to this development, providing an accessible area for walking, cycling, and wheeling.

The scope of the Section 278 works will include (but not limited to):

Fenchurch Street

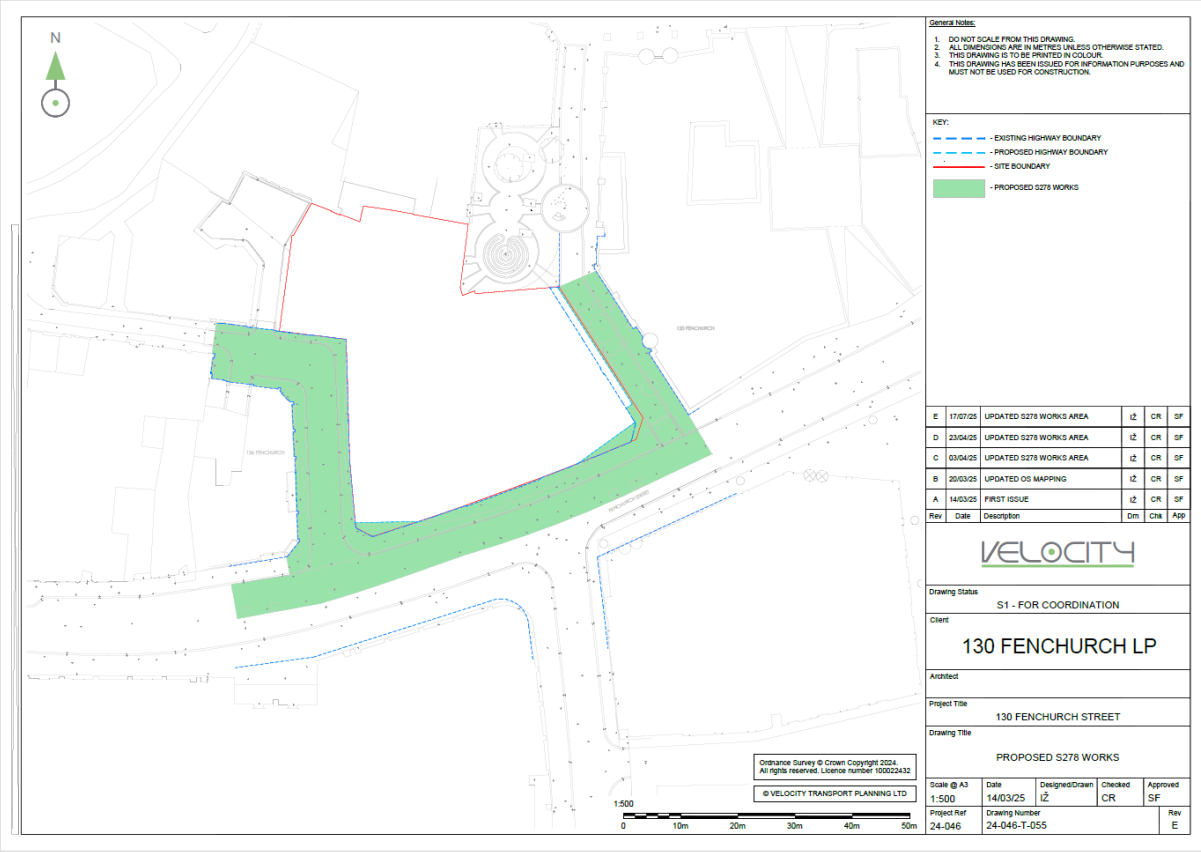
- Reconstruction of the footways fronting the site
- Resurfacing of the carriageway
- Reinstatement of pedestrian island following construction, subject to detailed design and pedestrians desire line.
- Reinstatement of road markings

Cullum Street

- Reconstruction of the footways fronting the site to accommodate new site layout
- Provision of raised carriageway
- Highways Drainage
- Reinstatement of road markings and associated traffic orders

Fen Court

- Reinstatement of paved areas and associated works



Construction Logistics Plan

The proposal involves a significant amount of demolition and construction work, which will generate a large number of construction vehicle movements during the overall construction period. These proposed works could significantly impact the operation of the public highway in the local area if not managed effectively. The primary concern is public safety, but it is also essential to ensure that construction traffic does not unreasonably create or add to existing traffic congestion, or impact the road safety or amenity of other highway users.

The proposal (see figure below) is also likely to lead to various amenity issues for local businesses that need to be carefully managed (e.g., noise, vibration, air quality).

To mitigate the above, an outline Construction Logistic Plan (CLP) has been submitted in support of the planning application.

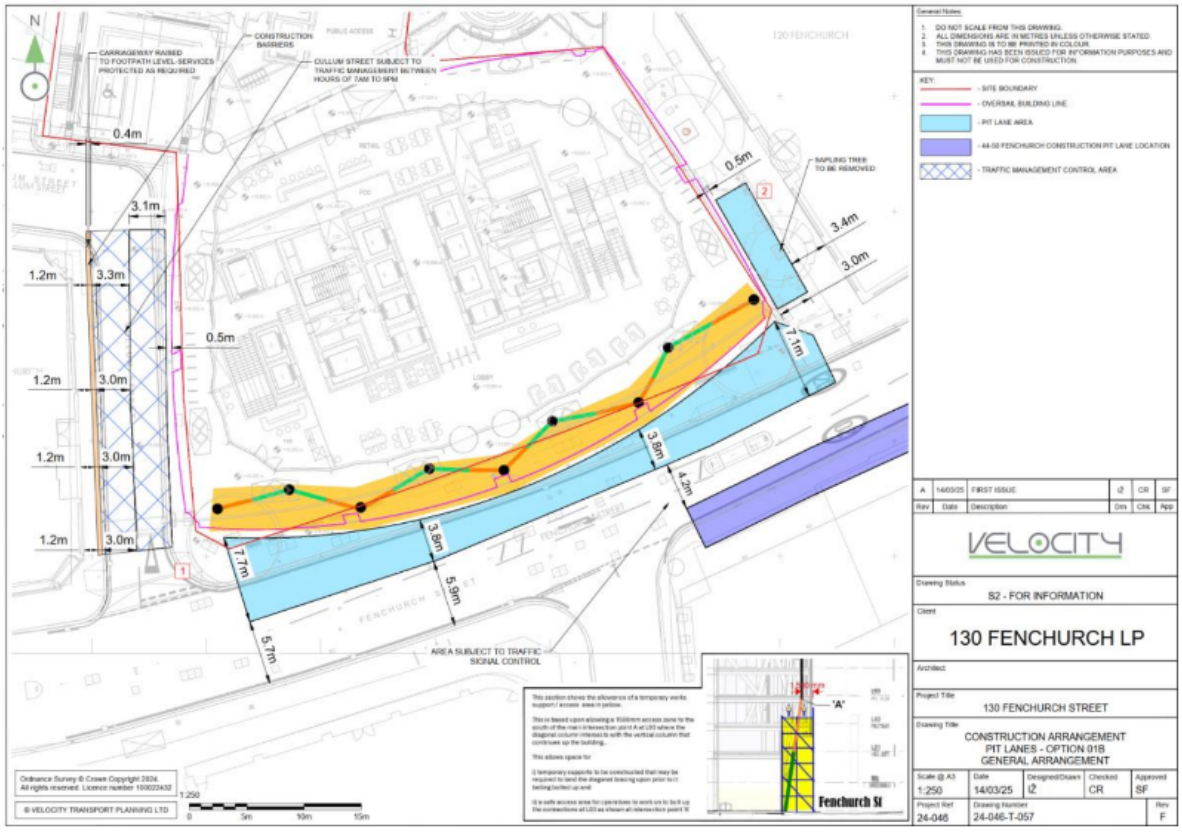
This plan provides information describing the proposed works and how, at this preliminary stage, they could be undertaken. It also details how the impacts associated with the construction period would be mitigated and highlights concerns of local stakeholders early on to ensure these are accounted for within the detailed Construction Logistics Plan. This requirement should be secured by condition and prepared once a Principal Contractor has been appointed.

This document will need to align with Transport for London's Construction Logistics Plan Guidance and will be subject to City of London approval before demolition and construction can commence. The detailed Construction Logistics Plan should highlight, among other things, how public liaison and coordination with other nearby construction sites will be

managed. The appointed contractor will be required to join the construction cluster groups, which are groups formed by nearby construction sites holding regular meetings with the attendance of the City of London's highways officers to ensure coordination.

Commencement of works will be subject to appropriate legislation under the London Permitting Scheme, which falls under the Traffic Management Act 2004. The construction works of the development will need to be coordinated with the nearby sites. Proposed construction proposals may have to be reviewed for coordination.

If planning permission is granted, the submission of a detailed CLP should be secured separately via condition to ensure the construction and demolition of the site comply with The London Plan Policy T7 and DM16.1 of the City of London Local Plan 2015 and with the emerging City Plan 2040. This would provide a mechanism to manage and mitigate the impacts the proposed development would have on the local area. The detailed CLP would need to be approved by the City of London prior to the commencement of works on site, should planning permission be granted.



Recommendation

The scheme benefits from high levels of public transport accessibility, would be car-free and it promotes cycling and walking as sustainable modes of transport. The proposals are considered acceptable in transport terms, subject to conditions and S106 obligations.

Should planning permission be granted the following conditions (as a minimum) along with the Section 278 and Section 38 of the Highways Act 1980 to be secured:

• A planning condition requiring the provision of 860 long stay cycle parking spaces, 48 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.

• A planning condition to secure the detailed Construction Logistics Plan (CLP). The condition shall state that the detailed CLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the CLP has been approved by the planning authority.

• A S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.

• A S106 obligation to secure an Accessible Car Park Management Plan (ACPMP) including details of how the accessible parking spaces will be managed to accommodate the users and their requirements.

• A S106 obligation to secure a Travel Plan (TP) for the development. The obligation shall state that the TP shall be approved prior to the first occupation of the site and the approved travel plan shall be followed for 5 years, unless otherwise agreed with the Highway Authority.

Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction.

It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

Transport Planning Obligations

1. To enter into a Section 278 Agreement of the Highways Act 1980 with TFL

3. Accessible Car Parking Management Plan to include management and criteria for use of the disabled parking space.

4. Travel Plan (TP) including a cycle promotion plan.

5. Number of vehicle trips attending the servicing area to be capped at 99 one-way trips

6. Delivery Servicing Management Plan (DSMP): Details of a Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The Servicing Management Plan shall be

submitted yearly for a period of 5 years. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

Transport Planning Conditions

Threshold levels

1. Before any construction work, including demolition, begins, the proposed threshold levels within the entire perimeter of the site must be submitted to the Local Planning Authority for approval.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory ground levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement and should be submitted in Cad Format for analysis.

Doors not to open outwards

2. No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.

Site Condition Survey

3. Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority

REASON: To ensure the satisfactory reinstatement of the highways, upon completion of construction works, in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.

Stopping Up Order

4. Prior to the commencement of any construction works, the applicant is required to apply for a stopping up order under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at:

https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk

REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.

Demolition and Construction Logistic Plans

5. 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 be 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 6.14 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.

Protection of Subway Pipes

6. Prior to the commencement of any construction works, a basement impact and ground movement assessment is required to be submitted to and approved by the Local Planning Authority in writing.

REASON: To ensure that demolition and construction works do not adversely impact the existing Fenchurch Avenue subway pipes, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1.

Servicing and Delivery

7. Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors.

REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

8. Before the use authorised by this permission commences, adequate facilities for servicing must be provided within the curtilage of the site for loading and

unloading. Details of such facilities must be submitted to and approved in writing by the Local Planning Authority. The approved facilities must be maintained and used as approved for the life of the building.

REASON: To ensure that traffic in surrounding streets is not impeded, and a free flow of traffic is maintained in accordance with the following policy of the Local Plan: DM16.5.

Hours of servicing

9. Deliveries, servicing, including refuse recycling vehicle trips (excluding any on-foot and cargo bike deliveries) shall take place between the hours of 23:00 to 7:00, Monday to Sunday.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM16.1, DM21.3.

Car parking

10. Designated car parking spaces shall be provided on the site for use by people with disabilities in accordance with the requirements of the London Plan. These spaces shall be clearly marked, maintained throughout the life of the building, and be readily available for use by disabled occupiers and visitors at no charge to the individual end users of the parking.

REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.

Public Highway to be maintained prior to closure order

11. The public highways shall remain as public until such time as the necessary Stopping-up Order has come into effect. No implementation is permitted until then.

REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.

Transport Planning Informative

Highway Authority

1. This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as the Highway Authority; and works on the public highway must not be commenced until the consent of the Highway Authority has been obtained along with relevant licences and legal agreements.

2. Works to the public highway, are undertaken via a Section 278/38 Agreement. It forms part of a separate process along with associated fees. The planning permission hereby granted does not authorise these works to be carried out without the necessary agreement, approvals and relevant highways licences.

3. A stopping up order is a legal process under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk

4. You are advised to comply with the New Roads and Street Works Act 1991 and notify the Street Authority of any proposed works in accordance with the Act.

5. The City Operations (Highways Management & Maintenance) must be consulted on the following matters which require specific approval:

a. Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works, including temporary crossovers. Information can be found at: Highway licences - City of London

b. The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the City Operations is recommended to ensure the design of the building provides for the inclusion of street lighting. Information can be found at: deshighwaysupport@cityoflondon.gov.uk

c. The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). Information on projection licences can be found at: Bridges and highway structures - City of London

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the

land owner to secure the air space. Please contact the Corporate Property Officer, City Surveyor's Department at: district.surveyor@cityoflondon.gov.uk

d. Bridges over highways, approval for moving an abnormal load through the City of London is required prior to operations. Your proposal must include your intended route and should be emailed to the Bridges team at bridges@cityoflondon.gov.uk. Allow at least three working days for us to process your application.

Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 05/08/2025
Your Ref: 25/00529/FULEIA

Subject: 130 Fenchurch Street, London, EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

An ES has been submitted as part of the EIA, with an Air Quality Chapter included. Due to being an EIA, in addition to an Air Quality Neutral Assessment an Air Quality Positive Statement has also been submitted as part of the application. In addition, following a number of queries on the documentation submitted as part of the ES a response note was provided by the AQ consultant.

The development has proposed the installation of a single landlord backup diesel generator. The generator is for life-safety emergency operation only and cannot be used for any level of business continuity. The applicant has advised that there may be provision for future tenants to install further generator(s) for tenant use. Therefore, the assessment of any future proposed tenant generators will be conditioned. Alternatives to the landlord diesel generator for emergency power supply have been explored, with the proposed used of a diesel generator justified. If installed, as per the condition recommended, the generator should be fitted with mitigation, such as SCR, to reduce NO_x emissions to comply with the City of London Air Quality SPD and only tested only in-line with manufacture guidance.

The development is Air Quality Neutral, as per GLA guidance, with one blue-badge car parking space and the heating demand provided by air source heat pump technology. It should be noted that emissions from the proposed emergency life-safety generator and service and delivery vehicles are exempt from Air Quality Neutral.

The Air Quality Positive Statement submitted was generic and did not include any evidence of air quality influencing design development and there was no Implementation and Monitoring Plan included within the statement These comments were addressed in the response note submitted following officer questions.

Should the development be approved please attach the following conditions:

Landlord Plant Emissions

The landlord generator must comply with the Air Quality SPD 2017 and details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.

Tenant Plant Emissions

Prior to any tenant generator being commissioned and installed in or on the building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall include an Air Quality Neutral assessment completed in line with the latest Air Quality Neutral guidance. The assessment shall detail how the plant will minimise emissions and comply with the Air Quality SPD 2017. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.

Condition M29

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason
To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.
In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

Public Access and Inclusivity

Policy Context

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 emerging City Plan 2040 policy HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.

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

Arrival at the Site

The site is well-served by public transport, including London underground from Bank and Monument, national rail links from Fenchurch Street and Cannon Street and buses from Eastcheap, Cannon Street and King William Street. It is noted that neither Bank or Monument are step free and the closest step free underground station is Liverpool Street Station, all public transport nodes exceed the recommended 50m travel distances without a rest.

Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. The closest taxi rank is located on Mincing Lane which is approximately 100m from the site. No specific drop-off points are identified as part of the proposal however informal drop-off anticipated along Cullum Street which is within 50m of the site.

The walking distances from key public transport nodes and on-street carparking exceed the recommended 50m without a rest. It is therefore recommended that opportunities for such resting points with accessible seating are explored, at maximum intervals of 50m along the approaches to the building from key points of arrivals. Exploring such opportunities and their feasibility is therefore included within the scope of the s278 and s106 agreement being secured.

An accessible parking space would be provided on site within the loading bay accessed directly off Cullum Street. The parking space would be for staff only and visitors to the building would be expected to use the two existing on-street parking spaces along Mincing Lane approximately 100m south of the site. Officer users would be able to access the office entrances by exiting the building and moving around the building externally via either Cullum Street or the new public route. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.

A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.

Continuing provision of the existing Blue Badge space in the area during construction is important provided it is safe for use, and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Public Realm

A new publicly accessible route is proposed through the city block, creating a step free route between Cullum Street and Fen Court Garden. The new route will be sloped to ensure there is level threshold into the retail entrances and cultural entrance. The new route would be designed to be welcoming and safe, through the integration of lighting, natural surveillance from the active ground floor uses and clear slight lines. Further detail will be secured via condition

The setting back of the building at the lower levels will create more generous pavement widths around the base of the building. Where new thresholds are created these will be level and step free. The new public realm should be designed in line with the Mayors Public London Charter and further detail regarding the hard and soft landscaping will be secured via condition.

Cycle and End of Trip Facilities

The long stay cycle parking would be accommodated on the mezzanine of basement level 01 and is access via a sliding door directly off Cullum Street. The internal access to the cycle store is via cycle lift, one lifts is provided, and two staircases. All gates and doors along the route would be automated and sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users. Further detail will be secured via condition.

Routes from the cycle store to end of trip facilities, located on basement 01, would be via steps and dedicated end of trip shuttle lift. Access from the cycle store and EoT facilities to the office receptions on either ground or mezzanine would be via the dedicated EoT shuttle lift, providing a logical and accessible route. All doors along routes would be automated or power assisted. Two accessible showers would be provided directly off the EoT lounge lobby, in close proximity to the lifts, providing an accessible shower, toilet and lockers, further detail would be secured by condition.

Short stay cycle parking would be accommodated in the public realm around the base of the southern block, with a mixture of standard and accessible Sheffield stands.

It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. 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.

Entrances and Arrival Experience

London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm. Further detail will be secured via

condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to in line with inclusive-design best practice guidance.

Office

The primary office entrances along Fenchurch Street and Fen Court are formed by two large drum barrel doors. The use of automated large drum doors would provide entrances into the office which are easily identifiable and allows a wide range of people to use the same entry point independently without additional effort, separation or special treatment.

The ground floor office lobby is arranged over two levels which are navigated via five steps or retracting staircase platform lift. The platform lift should be designed for independent use any associated signage and wayfinding should be logical and inclusive. Further detail will be secured by condition and the IAMP.

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.

Due to limited space at ground floor not all lifts come to ground, and office users would either access the lift cores via the security gates at ground floor or via the mezzanine level reception. Prior to the security line the mezzanine level reception is accessed either by steps or escalator and no step free route is provided prior to the security line. Step free access to the mezzanine level reception would be via the southern lift core access via ground floor. Users who require access to the northern lift core would be required to transfer at the mezzanine level, users would not be required to navigate the security barriers more than once. Wayfinding and management of the lifting strategy will be secured via condition and IAMP to ensure the routes are logical and easily identifiable.

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 would be provided through condition.

Cultural Provision

The primary entrance to the cultural spaces would be via a drum door located on the corner of the north building along Cullum Street adjacent to the new public route through the building. The security line will be located internally and is formed of a double leaf swing door, this door should be automated, and further detail will be secured via condition. From the entrance lobby visitors will be transported up to either level 17 or 20 via two lifts. The access to both the cultural space and level 20 viewing terrace have been designed to be welcoming, inviting and inclusive with security at a minimum under the current security threat. The access and experience will be required to meet the aspirations of the Mayors Public London Charter and further details on inclusion measures will be provided within the IAMP.

Retail and F&B

The entrances to both the retail unit and the F&B spaces associated with the ground floor office would be formed of double leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Further detail will be secured via condition to ensure that the entrances are easily identifiable and logical.

The F&B unit is arranged over two levels which are navigated internally via two step or a platform lift. The platform lift should be designed for independent use any associated signage and wayfinding should be logical and inclusive. Further detail will be secured by condition and the IAMP.

Vertical Movement

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. Both the cultural and office accommodation will be served by two FF lifts and two EVAC lifts. Further detail regarding the design, management and maintenance of all lifts will be secured via condition.

Evacuation and Fire Safety

All fire escape routes are step free through the use of EVAC lifts, slopes and ramps. All gates and doors along the route would be automated sized in accordance with Approved Document M and ramps and corridors would be sized accordingly to allow a minimal 1500mm clear width and handrail in line with Approved Document M and K.

Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

Horizontal Movement

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.

Terraces and Landscaping

Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.

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

All terraces should be designed to meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping

will be secured by condition, and that details on how the planting specification would be inclusive is provided.

Spend areas for assistance animals are not currently identified but will be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

Office

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

Two types of terraces are proposed with linear terraces at lower levels and larger terraces at upper levels. The linear terraces would have no fixed furniture and where loose furniture is introduce this should ensure that a minimum clear width 1500mm is maintained. The balustrade height around the linear terraces would be formed of 900mm planter with a 500mm mesh screen above.

The larger terraces found levels 28, 29, 30 and 31 would have integrated fixed seating into the planters, this seating should be designed to incorporate a range a seat heights, backrests and armrests. Where loose furniture is introduced, this should ensure that a minimum clear width 1500mm is maintained. The balustrade would be fully glazed and at a minimum height of 1500mm allowing for opportunities to views out from the terrace for a range of users.

Further detail regarding the planting strategy and balustrade design will be secured via condition to ensure that there is an equal opportunity to a view and that the planting is not overly scented and that unwanted touch is avoided.

Cultural Provision

The terrace doors out onto public viewing terrace and cultural terrace are formed of double leaf swing doors and single leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via IAMP.

The detailed design for the level 17 terrace and level 20 public viewing terrace should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. Where seating is integrated into the planting it would be designed to allow wheelchair users to sit alongside and transfer. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

The balustrade height around the public terraces would be formed of 600mm planter with a 2200mm glazed screen above, allowing for opportunities to views out from the terrace for a range of users.

Sanitary Facilities

Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry.

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

Office

It is confirmed that an accessible toilet will be provided within the ground floor office reception lobby prior to the security line. The upper levels will cluster the sanitary provision around the cores, providing both ambulant and accessible toilets. The sanitary provision varies in location, arrangement and provision as you move up the building. The sanitary provision for the office floor accommodation would provide a mixture of gendered and non-gendered WC's in accordance with approved document Part T and at least one accessible WC and two ambulant WC's per floor. Further detail will be secured via condition.

Cultural Provision

The sanitary provision for the cultural space includes three toilets including one accessible on each of the upper levels of accommodation, no sanitary facilities are provided at ground floor and no baby changing facilities have been included. Further detail regarding how baby changing facilities, ambulant toilets and ground floor sanitary facilities can be integrated will be secured via condition.

Retail and F&B

Both the retail unit and the F&B unit would have a single accessible toilet which is accessible from the entrance level, further detail will be secured via condition.

Cultural Provision

The proposal includes internal and external cultural space at level 17 and level 20 including a public viewing terrace.

The internal arrangement of the cultural space should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured by condition, the IAMP and S106.

An end-user has not been identified for the culture use and conditions are imposed to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

An obligation for Inclusive Procurement has been made under the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

Signage and Wayfinding

Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of ‘two senses’. Details of signage and wayfinding will be secured by condition.

Access and Inclusivity Conclusion

The proposal has been designed to ensure that the site meets the highest standard of inclusive design in line with Local Plan DM10.8 and London Plan Policy D5. In order for the proposed office, retail and cultural uses to fulfil its goal of being an inclusive and welcoming place to work and visit, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the accessibility of the site in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Inclusive Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

From: PlanningGatewayOne
To: PLN - Comments
Subject: RE: Planning Application Consultation: 25/00529/FULEIA (Our Ref 25-0146)
Date: 02 May 2025 10:21:47
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Good morning,

Thank you for your email in relation to 25/00529/FULEIA

HSE is the statutory consultee for planning applications that involve or may involve a relevant building. Relevant building is defined as:

• contains two or more dwellings or educational accommodation and

• meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A(9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Once again thank you for your email, if you require further advice with regard to this application, please do not hesitate to contact the planning gateway one team quoting our reference number in all future correspondence.

Kind Regards

Allison Gray
Allison Gray | Operational Support Planning Gateway One | Building Safety Division
✉:planninggatewayone@hse.gov.uk

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 02 May 2025 10:04
To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Subject: Planning Application Consultation: 25/00529/FULEIA

Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

02 May 2025
Crossrail Ref: CRL-IP-3419

Dear Alex Thwaites,

25/00529/FULEIA : 130 Fenchurch Street London EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 02 May 2025, requesting the views of TfL on the above application. I confirm that this application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Safeguarding Officer (Elizabeth line)
TfL Infrastructure Protection Team
Floor 7 Red Zone: 5 Endeavour Square : London : E20 1JN

……

Note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

From: Active Travel England Planning
To: Pln - CC - Development Dc
Subject: LPA Reference: 25/00529/FULEIA Standing Advice Response
Date: 02 May 2025 15:24:10

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 25/00529/FULEIA

ATE Reference: ATE/25/00647/FULL

Site Address: 135 FENCHURCH STREET, LONDON, EC3M 5DJ

Proposal: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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]]>

[ref:a0zTw000003pw9tIAA;576948da66ed31385174ae657b0fb581:ref]

From: DO - Airport Safeguarding\BAA
To: PLN - Comments
Subject: RE: Planning Application Consultation: 25/00529/FULEIA
Date: 08 May 2025 08:08:04
Attachments: image.png

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Building Notification
As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (aerops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notifications/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince | Airport Planning Manager

On behalf of Heathrow Airport Ltd.

Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU
United Kingdom
T: [redacted] | M: [redacted]
[redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 02 May 2025 10:16
To: DO - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 25/00529/FULEIA

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Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London

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Heathrow Airport Holdings Limited is a private limited company registered in England under Company Number 05757208, with the Registered Office at The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW.

From: NATS Safeguarding
To: PLN - Comments
Subject: RE: Planning Application Consultation: 25/00529/FULEIA [SG37998]
Date: 08 May 2025 09:59:03
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37998

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 02 May 2025 10:17
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: Planning Application Consultation: 25/00529/FULEIA

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Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ . Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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creating a better place

Environment Agency

Alex Thwaites
City of London
Dept. of the Built Environment
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/138147/01
Your ref: 25/00529/FULEIA

Date: 8 May 2025

Dear Alex,

130 Fenchurch Street London EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Thank you for consulting us on the above planning application. There are no environmental constraints within our remit at this site, and therefore **we have no comments** on application. Please consider the general advice on water resources, for which we recommend the applicant considers for this application.

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. ‘major’ developments) should achieve the BREEAM ‘excellent’ standard for water consumption (category ‘WAT 01’), or equivalent. This standard may already be a requirement of the local planning authority.

Cont/d..

INVESTOR IN PEOPLE

We also recommend you contact your local planning authority for more information.

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me on HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

End

LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

Alex Thwaites
Environment Department
City of London

13 May 2025

Dear Amy

Re: Planning Application No: 25/00529/FULEIA - Demolition of existing buildings and the construction of a mixed-use development of 34 storeys above ground level at 145.86m AGL & 161.46m AOD at 130 Fenchurch Street, London EC3M 5DJ

Our Ref: LGW5844

Thank you for your letter/email dated 02 May 2025, regarding the above-mentioned consultation.

It appears from the details submitted under this consultation that there will be no impacts with regard to aerodrome safeguarding in relation to London Gatwick.

This response relates only to London Gatwick, other airports will have different requirements.

For information, please note that the DfT Circular 'Town & Country Planning (safeguarded aerodromes, technical sites & Military Explosives Storage Areas) Direction 2002, under Annexe 2 'High Structures', requires that Local Planning Authorities notify CAA of any buildings or works extending 91.4m or more above ground level, as soon as permission has been granted. Please notify CAA at arops@caa.co.uk

For details of the information to be submitted please refer to the circular at The town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 - GOV.UK (www.gov.uk)

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer
For and on behalf of London Gatwick
Email: gal.safeguarding@gatwickairport.com

Date: 14 May 2025
Our ref: 511790
Your ref: 25/00529/FULEIA

City of London

BY EMAIL ONLY
PLNComments@cityoflondon.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

Planning consultation: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.
Location: 130 Fenchurch Street London EC3M 5DJ

Thank you for your consultation on the above dated 02 May 2025 which was received by Natural England on 02 May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones
The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Samuel Norton
Consultations Team

Annex A – Natural England general advice

Protected Landscapes
Paragraph 189 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty
Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites
Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk).

Protected Species
Natural England has produced Protected species and development: advice for local planning authorities - GOV.UK (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply (www.gov.uk) for more information.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

Biodiversity Net Gain guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric for more information. For small development sites, The Small Sites Metric may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A – Natural England general advice

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:
Paragraphs 105, 185, 187 and 193 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

Historic England

Alex Thwaites
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 25/00529/FULEIA
Our Ref: 232341

Contact: Helen Hawkins
[redacted]

22 May 2025

Dear Alex,

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

130 Fenchurch Street London EC3M 5DJ
Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Recommend Archaeology Conditions

Thank you for your consultation received on 02 May 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.

An archaeological ES chapter and desk-based assessment accompanied the planning application (Mills Whipp 2025). An archaeological evaluation was also carried out on the site in advance of the planning application being submitted (PCA 2024). The ES and DBA identified that the site lies close to the centre of the Roman Provincial capital of Londinium, to the east of the Basilica – Forum complex. Substantial Roman buildings have been found in the area, most recently at 50 Fenchurch Street, and a Roman road may have crossed the site on the western side. In the late 14th century a garden was converted into a graveyard for St Gabriel's to the north of the site, although burials are not anticipated to extend onto the site itself. The whole site was destroyed in the Fire of London 1666 but soon rebuilt with dense houses, yards and alleys.Much of the site was destroyed in the Second World War. The present building was erected by 1958 with additions in 1970. The archaeological evaluation identified heavily truncated traces of Roman features in the south-western part of the side and on the east. In the north the basements were shallower but extensive modern foundations were present. Post-medieval and medieval deposits were found in this area and augering suggests Roman features may be present at depth. The proposed new basement floors will remove any surviving archaeological deposits across the site.

Although the evaluation found material of Roman and post-medieval date, it did not identify any highly significant remains and therefore archaeological conditions are believed to be suitable to allow for excavation, recording and disseminatation of the remaining archaeology on the site.

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.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

If you grant planning consent, paragraph 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.

I therefore recommend attaching two conditions as follows:

Condition 1 Investigation

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. 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.

Condition 2 Foundation Design

No development except demolition to slab level shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason Heritage assets of archaeological interest survive on the site. The planning authority wishes to ensure that significant remains are not disturbed or damaged by foundation works but are, where appropriate, preserved.

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.

Informative The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation designs for approval.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 218.

I envisage that the archaeological fieldwork would comprise the following:

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.

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.

Public engagement

Where appropriate, local planning authorities and the developer are advised to make investigative works open to and interpreted for the public and to include that as part of the WSI. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

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

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

Yours sincerely

Helen Hawkins

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

Historic England, 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.

From: [redacted]
To:
Subject: Port of London Authority response Plan ref: 25/00529/FULEIA
Date: 23 May 2025 17:22:03

THIS IS AN EXTERNAL EMAIL

FAO: Alex Thwaites

Dear Alex

Thank you for consulting the Port of London Authority (PLA) on the above mentioned planning application, for the;

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

At 130 Fenchurch Street, London. I have now had the opportunity to review the submitted document and can confirm the PLA has no comments to make

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
T: [redacted] | *M:* [redacted]

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From:	devcon.team@thameswater.co.uk
To:	PLN - Comments
Subject:	3rd Party Planning Application - 25/00529/FULEIA
Date:	27 May 2025 10:10:09

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

27 May 2025

Our DTS Ref: 41429
Your Ref: 25/00529/FULEIA

Dear Sir/Madam,

Re: 130, FENCHURCH STREET, LONDON, -, EC3M 5DJ

Waste Comments:
Waste Comments:The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments:
Water Comments:The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in

writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Tel: 020 3577 9998,
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk

Westminster City Council

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref:
My ref: 25/03130/OBS

Please reply to: Nikki Mitchell
Tel No: [redacted]
Email: [redacted]

Alex Thwaites
City Of London
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

27 May 2025

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 25/03130/OBS **Application Date:**

Date Received: 02.05.2025 **Date Amended:** 02.05.2025

Plan Nos: Letter dated 2 May 2025 from City of London.

Address: Development Site At 130, Fenchurch Street, City Of London, London

Proposal: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Yours faithfully,

[redacted]

Tracy Darke
Director of Town Planning & Building Control

dcncobsz091230

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.



CAROE ARCHITECTURE

Surveyor to the Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

Tel: [redacted]
Web: www.caroe.com

Alex Thwaites
Development Division
Corporation of the City of London
Sent via email only

28 May 2025

Dear Alex,

Letter of Response: 130 Fenchurch Street, London, EC3M 5DJ (ref: 25/00529/FULEIA)

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, regarding the live planning application for proposals at 130 Fenchurch Street as referenced above. You will recall that we responded to pre-application consultation last year.

Background

This letter of comment has been prepared regarding proposals at the above site, following a review of submission material.

The Cathedral was previously approached for comment on this scheme at pre-application stage. This included a presentation given by the project team held 2nd October 2024, and additional follow-up information later provided. The scheme does not markedly differ from that offered at pre-application stage. As such, the comments below are based upon that previously offered for comment.

Comment

The proposals lie within the City Cluster, and thus within the setting of the Grade I listed Cathedral. In terms of view management, riparian views along the Thames and identified within the LVMF are of relevance. In addition, whilst not within the St Paul's Heights Policy Area, those local views identified are of relevance in terms of the backdrop and skyline setting of the Cathedral, as noted within the City's *Protected Views SPD*. Given the location of the site, it is noted that the scheme has potential to impact views along the Processional Way.

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The Processional Way

We welcome the design response of the proposals in relation to avoiding impacts as appreciable along the Processional Way. In recent years we have begun to see a very positive shift in the way that proposals respond to this highly significant and sensitive aspect of the Cathedral's setting. This is matched by the evolving sophistication of the technology used to visualise and test proposals. The acknowledgement that the proposals will not be seen from anywhere along the Processional Way is therefore welcomed. We also now have a greater understanding of the role of the 300mm offset from the Fleet Street building line used for visualisations – and why the hard building line is not used in these instances. We still, however, seek assurance that Officers ensure that the scheme will not cause 'technical' visibility or any impacts along the Processional Way. As long as you are confident in the assessment methodology, we have no further comment.

Contribution to the Cluster & Interaction with Emerging Policy

The proposals will add a new tall building to the city cluster. As noted within the consultation meeting, those views of some relevance to the cathedral are those strategic and local views along the river corridor from the southwest.

As discussed within our other representations on nearby schemes (see 60 and 70 Gracechurch Street), the Cathedral is interested in the overall design direction of the cluster in this regard. We are interested that City officers appear to take issue with our concerns relating to the urban design direction and form of the cluster. It seemed that Officers felt this was a matter which should be outside our role and interest. We would be happy to discuss this aspect of our commentary further.

Our concern remains that a number of development proposals appear to deploy their design approach to 20 Fenchurch Street 'the Walkie Talkie' as a datum or target – seeking to create development that both forms a plateau in the overall form of the cluster. This development for 130 Fenchurch Street appears to be seeking to reach up to and envelop the 'outlier' of 20 Fenchurch Street.

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St Paul's feels that there is a collective 'urban design' discussion to be had about how the cluster is successfully formed and shaped as policy has been progressively opening up sites for substantial growth to the south and towards the river. This development process is happening very rapidly. The City are curious as to why St Paul's is interested in these townscape issues. Our view is that our locus does rightly consider the character and composition of key views of the Cathedral. These may also have heritage implications.

This is of importance to those schemes discussed above given where they are located in relation to the Cathedral. However, it is also of relevance to 130 Fenchurch Street – given the proposals seek to build up to the height of the nearby consented 50 Fenchurch Street & the Walkie Talkie (the former here considered part of the baseline, though not yet complete). Whilst the proposals at 130 would be screened by the cumulative baseline, they still seek the same approach – using the Walkie Talkie as a 'target', rather than the earlier building remaining an outlier. There is of course planning history in the Inspector's judgements from 2009 regarding what was then judged as an anomaly in the formal planning and urban design of the Cluster. This is clearly also linked to emerging policy within the City Plan 2040, and thus part of wider conversations occurring to date.

Conclusions

From the information provided, we understand that perhaps the most prominent risk of heritage harm and adverse visual impact – as appreciable along the Processional Way, has been successfully avoided. As noted above, we seek assurance from Officers that this is the case.

However, we do have wider queries about the future form of the Cluster that are of relevance to and are characterised by the proposals at 130 Fenchurch Street. We suggest that there can and should be a more express and transparent, public conversation around urban design issues relating to the Cluster at Planning Committee, as this is a more strategic matter that should not be determined on a case by case basis.

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We hope this is a response that furthers the shared aims of the Cathedral and the City.

Yours sincerely,

[redacted]

Surveyor to the Fabric

cc: Tom Nancollas, Assistant Director (Design), City of London
Joanna Parker, Principal Planning Officer (Design), City of London
Rebecca Thompson, Director of Property, St Paul's Cathedral

Directors:
Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:
Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269; Lewis House, Great Chesterford, Essex CB10 1PF

Your Ref:
Our Ref: 25/01462/OBS

City Of London

PO Box 270,
Guildhall
London
EC2P 2EJ

28th May 2025

RE: REQUEST FOR OBSERVATIONS

Dear City Of London

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS
I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 25/01462/OBS Date of Application: 02.05.2025 Date of Decision 28.05.2025

Proposed Development At: **Adjoining Borough Observations Within The Corporation Of London**

For:	Observations on a proposed development within the adjoining Borough of City of London with respect to Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development at 130 Fenchurch Street London EC3M 5DJ. Reference number : 25/00529/FULEIA

Approved Plans

Conditions

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 28th May 2025

LPA Ref: 25/00529/FULEIA

London City Airport Ref: 2025/LCY/116

Date: 28/05/2025

Dear Alex Thwaites,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	25/00529/FULEIA
Proposal	Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.
Location	130 Fenchurch Street London EC3M 5DJ
Borough	City of London
Case Officer	Alex Thwaites

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on [specify the building(s) or other structure(s)]. These obstacle lights must be steady state red lights with a minimum intensity of [specify 32 or 2000 candelas]

Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development [if possible specify the part(s) of the development] to avoid endangering the safe movement of aircraft and the operation of London City Airport.

Photovoltaic cells (Glint & Glare) Condition

No solar photovoltaic panels shall be fixed in place until the developer has completed a "Glint and Glare Assessment" which has been submitted to and approved in writing by the Local Planning Authority in consultation with London City Airport. Installation, operation, and maintenance of the solar photovoltaic panels shall thereafter be in accordance with the approved "Glint and Glare Assessment", which is approved by London City Airport.

Reason: London City Airport requires a glint and glare assessment to determine the full impact on Air Traffic Control facilities and pilots.

We would also like to make you aware of the following:

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).
The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport, or not to attach conditions which London City Airport has advised, it shall notify London

City Airport, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Madison Atkinson
On behalf of London City Airport

SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0027

Date of issue of this decision: 02/06/2025

LBS Reg. No.: 25/OB/0027	**Date of Issue of Decision:** 02/06/2025
Your Ref No.:	

Applicant City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Request for observations from City of London Corporation for 'Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development'.

At 130 Fenchurch Street London EC3M 5DJ

In accordance with your letter received on 13 May 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Planning Department

Submission by email:
PLNComments@cityoflondon.gov.uk

Dalia Alghoul
Town planning Technician
1 Stratford Place,
London
E15 1AZ

Date: 5 June 2025

NR Reference:
TPA/3PT/25/075

Network Rail Consultation Response

Reference: 25/00529/FULEI A
Location: 130 Fenchurch Street London EC3M 5DJ

Dear Sir/Madam,

Thank you for consulting Network Rail (NR) regarding the planning application reference: 25/00529/FULEIA. We would like to be contacted for future applications in the vicinity of Liverpool Street Station.

After reviewing the applicant's transport assessment, NR has no comments regarding Fenchurch Street and Moorgate Stations, as the impact on these stations is relatively low and there are no capacity concerns.

However, concerning Liverpool Street Station, the transport assessment indicates that the majority of the additional rail trips will involve this station. NR would like to take this opportunity to remind the City of London of the following:

Liverpool Street Station Capacity Considerations

As we review the application, it is important to highlight our concerns regarding the forecasted growth in rail demand at Liverpool Street Station (LST). NR remains worried about the cumulative impact of multiple consented and proposed major developments in the immediate vicinity of LST, particularly concerning medium-term pedestrian flow and station concourse capacity.

Currently, there is no committed or funded scheme to address the increasing pressure on pedestrian infrastructure within and around the station.

This is a material consideration that should be weighed by the City of London when assessing the overall acceptability of ongoing developments in the area.

We encourage the City to continue considering the potential allocation of its Community Infrastructure Levy (CIL) funds to address the collective infrastructure challenges created by cumulative growth.
I trust this clearly outlines Network Rail's position on the planning application. Should you require any more information from Network Rail, please do not hesitate to contact me.

Kind regards,

Dalia Alghoul
Town Planning Technician | Property | Eastern Route | Anglia
1 Stratford Place | London | E15 1AZ
[redacted]
www.networkrail.co.uk/property

Historic England

Mr Alex Thwaites
City of London Corporation
Planning Department

Direct Dial: -

Our ref: P01592510
25 June 2025

Dear Mr Thwaites

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

130 FENCHURCH STREET LONDON EC3M 5DJ
Application No. 25/00529/FULEIA

Thank you for your letter of 2 May 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The application site is within the setting of the Tower of London World Heritage Site (WHS), a heritage asset of exceptional and international significance. The proposals remain largely unchanged from the scheme we commented on at pre-application stage (4 December 2024) and involve replacing the current approx. 14 storey office building with a new 34 storey tower.

The HIA provided indicates the new building would be visible in protected views of the WHS, adding incrementally to the growing cumulative impact of the Eastern Cluster on its significance and Outstanding Universal Value (OUV), as well as the local heritage context around Leadenhall Market.

While the impact of this proposal would be modest and the level of harm low, we consider it could be reduced through a reduction in the height and mass.

We recommend that you should only approve the scheme if persuaded that the harm has been sufficiently minimised and that the remaining harm is outweighed by public benefits. In making this decision you will need to give great weight to the conservation of the designated heritage assets.

Historic England Advice

<u>Significance of the site and those heritage assets affected by proposals</u>

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.

a) The site

The site sits within the City of London's Eastern Cluster and is currently made up of a 14 storey office building with two-storey podium fronting onto the north side of Fenchurch Street.

Fountain House was completed in 1958 to designs by W.H Rogers and is the first example of podium and tower of the post-war period in the City of London, emulating the model established by Lever House in New York just six years prior.

Whilst not a designated heritage asset, Fountain House is a good early example of the podium with tower model whose architectural quality and scale reflect the post-war ambition to rebuild the City.

b) The Tower of London World Heritage Site

The Tower of London's attributes, as defined in the adopted WHS Management Plan (2016), convey its Outstanding Universal Value as an internationally important monument. The property is an outstanding example of late 11th century innovative Norman military architecture. It is the most complete survival of an 11th century fortress palace remaining in Europe. The property is a model example of a medieval fortress palace.

Evidence of the complete nature and surviving medieval remains of the fortress is a key attribute of OUV and is best appreciated from the heart of the castle within the Inner Ward. This space is dominated by the White Tower and is framed by historic buildings of diverse materials and styles which reflect the complex history and sequential development of the fortress.

A special characteristic of the Inner Ward is the sense of intimacy as a place apart from the modern city beyond, set behind the high walls and surrounded by historic buildings, including the grade I chapel royal of St Peter ad Vincula, which is an important part of the medieval remains attribute of OUV.

Setting supports the appreciation of this attribute in views over and between its enclosing buildings and walls which emphasise the sense of separation between the Tower and the evolving 21st century cityscape around it.

The sense of seclusion in these views and their contribution to the integrity of this attribute of OUV has been eroded by the increasing visibility of tall buildings behind the church and above the walls in recent years.

For both protection and control of the City of London, the Tower had a landmark siting. As gateway to the capital, the Tower was in effect the gateway to the new Norman

kingdom. Sited strategically at a bend in the River Thames, it has been a crucial demarcation point between the power of the developing City of London, and the power of the monarchy.

It had the dual role of providing protection for the City through its defensive structure and the provision of a garrison, and of also controlling the citizens by the same means. The Tower literally 'towered' over its surroundings until the 19th century. Its setting therefore makes a particularly important contribution to the site's OUV.

The Tower's exceptional historic and architectural importance is reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

c) Fen Court

Directly northeast of the site is Fen Court, an intimate courtyard which is the only surviving remnant of the burial ground which belonged to the former church of St Gabriel which was destroyed in the Great Fire of 1666.

Three ornately carved 18th century table tombs still survive in the courtyard. The space also includes a series of stone sculptures added in 2008 by Michael Visocchi inscribed with a poem by Lemn Sissay entitled the Gilt of Cain, which commemorates the abolition of the slave trade.

Whilst not a designated heritage asset, Fen Court is an important remnant of the area's ecclesiastical past, and is managed by the City as a protected open space.

d) 37-39 Lime Street

Northwest of the site is 37-39 Lime Street, a 1929 classical office building of six storeys by Leo Sylvester Sullivan with carved details by Henry Poole. The building is listed at grade II and contributes positively to the wider townscape character of the Leadenhall Market Conservation Area.

The strong architectural profile and scale of this building reflects the prominence these buildings historically had on the junction of Lime Street and Leadenhall Place, and their historic role as part of the commercial hub which developed around Leadenhall Market during the 20th century. These characteristics and associations remain appreciable from within its immediate setting, and in local views from within the conservation area.

e) Leadenhall Market Conservation Area

Leadenhall Market Conservation Area (LMCA) is centred around Horace Jones'

Victorian market hall complex of 1881. The LMCA is made up of predominantly 4-5 storey Victorian buildings around streets which form intimate thoroughfares to the majestic market hall at the centre which is listed at grade II*.

The market halls are cathedral like spaces, with high level louvered glass lanterns designed to allow air and natural light to pour into the spaces within. The quality of this light is key to understanding the ornate character and significance of how these buildings were designed and operated and contributes to their continued enjoyment as public and commercial buildings.

Like many City conservation areas, LMCA has a tightly drawn boundary which was expanded in 2007 to include 37-39 Lime Street, meaning the application site directly abuts the eastern boundary of the conservation area.

Proposals and their impact

a) The proposals

The scheme proposes total demolition of the existing Fountain House and podium building, and construction of a tower of 34 storeys (161.46m AOD) with three basements. The massing would step down via a series of terraces to the north, with a curved elevation of segmented glass panels facing onto Fenchurch Street.

At ground level, the building would be set back beneath a series of 'V' shaped columns, with a new east to west access route created from Cullum Street through to Fen Court.

There are two expired consents for this site, involving tall buildings of similar height to the existing Fountain House of up to 18 storeys in 2016 (14/00496/FULMAJ) and up to 19 storeys in 2019 (16/00809/FULMAJ).

b) Impact

i. Tower of London WHS

A Heritage Impact Assessment (HIA) has been prepared as part of the submission.

The scheme would appear in part or wholly within three strategically important views of the Tower of London identified within the London View Management Framework.

The impact of the proposals in these views would be neutral, being largely lost amongst the backdrop of existing towers within the Eastern Cluster, and would therefore be unlikely to cause harm to the WHS's landmark siting and dominance attributes of OUV.

The HIA indicates the proposed tower would be marginally visible in the key view *from within* the Inner Ward of Tower of London WHS, west of the White Tower, with the western flank of the tower appearing to the side of the chapel of St Peter Ad Vincula. However, this view is part of a kinetic experience and from other locations within the Inner Ward the building is likely to be more visible.

This would add incrementally to the cumulative impact of tall buildings on the intimate experience of this part of the Tower of London, including the scheme at 50 Fenchurch Street which largely obscures the proposals at 130 Fenchurch Street. The effect would be to further increase the relative prominence of the Eastern Cluster within the Inner Ward, leading to a low level of harm to the medieval remains attribute of OUV.

ii. Local Historic Environment

The proposals have the potential to improve the pedestrian experience at ground level and access through to Fen Court, which could be a potential heritage benefit.

The scheme would however have an adverse impact on the local historic environment around Leadenhall Market, by merit of its significantly increased scale and massing.

Fen Court is a small space which is highly susceptible to loss of light and encroachment from surrounding development. The increased height and bulk of the proposed tower appears likely to further restrict the natural light reaching this space, when considered in relation to the existing podium and tower.

Leadenhall Market Conservation Area is currently experiencing a high degree of change, particularly in the scale of new towers being proposed around the central market halls, leading to an incremental erosion to the amount of natural light reaching the listed building.

This proposal directly adjoins the boundary of the conservation area and would add to this cumulative impact on the conservation area, and potentially the market halls, and the more intimate experience of views and spaces which are so characteristic of the LMCA.

<u>Legislation, policy and guidance</u>

London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection.

Adopted City (CS12 and CS14) and London Plan (HC1 and HC2) policies require

proposed developments to avoid harm to the OUV of the Tower, and that the cumulative impacts of incremental change in its setting require careful management.

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

Section 16 of the Framework sets out how the historic environment should be conserved and enhanced. It makes clear that heritage assets ranging from those of local historic value to World Heritage Sites are an irreplaceable resource and should be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of existing and future generations (Paragraph 202).

Paragraph 208 states that development proposals should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. In practice that means that alternative solutions should be fully explored before any application is determined.

Paragraph 212 states that that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. The more important the asset, the greater the weight should be.

Any harm or loss should require clear and convincing justification (paragraph 200). If any harm is deemed to be 'less than substantial', it should be weighed against the public benefits of the proposals (Paragraph 215).

Position

Historic England has some concerns regarding the scale of the proposed tower, which has the potential to impact the setting of multiple designated heritage assets, including the Tower of London WHS, the conservation area and associated buildings.

This impact, which we raised at pre-application stage, would be derived from the height and increased width of the proposed development as compared to the existing building.

For the purposes of the NPPF, we consider this harm would be low on the range of less than substantial harm. However, the cumulative harm, when considered alongside other existing and consented developments, has the potential to be greater.

A reduction in the height and mass of the tower could potentially avoid this harm and

any cumulative impact on the Tower of London.

These changes would in turn have the added benefit of knitting the scheme more successfully into its local context, bridging the change in scale of the new tall building and the lower-scale, more intimate historic environment of the LMCA.

Recommendation

You should only approve the scheme if persuaded that the harm has been sufficiently minimised (NPPF 208) and that the remaining harm is outweighed by public benefits (NPPF 215).

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

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

Benedict Dewfield-Oakley
Inspector of Historic Buildings and Areas
E-mail: [redacted]

cc: Dr Helen Woodhouse, Senior International Adviser, Historic England - [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.

ISLINGTON
For a more equal future

PLANNING DECISION NOTICE

Development Management Service
Planning and Development
Islington Town Hall
London, N1 2UD
Planning@islington.gov.uk
W www.islington.gov.uk

Case Officer: Robin Tulloch
E: planning@islington.gov.uk

Alex Thwaites
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Issue Date: 7 July 2025
Application No: P2025/1258/OBS

(Please quote in all correspondence)

TOWN AND COUNTRY PLANNING ACTS

BOROUGH COUNCIL'S DECISION: Observations to adjoining borough – no comments

Notice is hereby given, in respect to the request for observation(s), of the above stated response of Islington Borough Council, the Local Planning Authority, in pursuance of its powers under the above mentioned Acts and Rules, Orders and Regulations made thereunder. The response relates to the application / development referred to below, at the location indicated.

The observations (if any) of the Borough Council are noted below.

Location:	Basement Retail Unit, Fountain House, 130 Fenchurch Street, London, EC3M 5DJ

Application Type:	Observations to Adjoining Borough	**Application Received**	02-May-2025
Application Valid:	02-May-2025	**Application Target**	26-Jun-2025

DEVELOPMENT:

Observations on Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development

OBSERVATIONS:

London Borough of Islington has no comments.

Certified that this document contains a true record of a decision of the Council

Yours faithfully

[redacted]

KAREN SULLIVAN

SERVICE DIRECTOR - PLANNING AND DEVELOPMENT
AND PROPER OFFICER

Alex Thwaites
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/25/00809
Your ref: 25/00529/FULEIA

Enquiries to: Robin Bennett
Tel:
Email: [redacted]

9 July, 2025

Dear Alex Thwaites,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	130 Fenchurch Street London EC3M 5DJ
Proposal	Observation requested by City of London for phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Thank you for your letter requesting the observations of the London Borough of Tower Hamlets on the above referenced application. I would be grateful if you would take the observations set out below into consideration in determining the application:-

1. LBTH has no comments to make.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,

The best of London in one borough

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ



Sripriya Sudhakar, Director Planning and Building Control

Transport for London

To: Alex Thwaites, City of London

From: Gavin Mclaughlin

TfL Reference: TFL/2025/0343

Your Reference: 25/00529/FULEIA

Date: We

Proposed Development: *Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.*

130 Fenchurch Street EC3M 5DJ – TfL Comments

Summary

The proposed development supports active and sustainable travel, reducing car dominance in line with Healthy Streets indicators. The Active Travel Zone (ATZ) assessment and public realm enhancements including widened pedestrian space and new street trees are welcomed. Cycle parking provision and end-of-trip facilities are broadly compliant with London Plan Policy T5 and should be secured.

The development is car-free, with no Blue Badge parking on-site, which aligns with Policy T6, subject to confirmation of accessible on-street provision. Servicing and delivery arrangements, including dual-use public realm and loading bay, are supported and should be secured via planning conditions.

The Construction Logistics Plan (CLP) is broadly accepted in principle, noting that the City is the relevant highway authority, and Bus Stop Y outside 30 Fenchurch Street should be kept open throughout construction. Further detail is required on the length and positioning of any pedestrian diversions including full temporary Traffic Management plans showing on-street measures. The City should secure monitoring funding and any funding needed for temporary supporting highway works by their section 278 (s278) team.

This is particularly important due to the close proximity of potentially simultaneous construction activity at 44-50 Fenchurch Street. The programmes for this development and that one should be co-ordinated to minimise impact; the current submitted CLP acknowledges the neighbouring site without detailed consideration for alignment with it.

Improvements identified in the Active Travel Zone (ATZ) Assessment should be funded by the applicant (see below). Further information is needed on a serious collision nearby, to confirm any further highway works mitigation required there.

Planning obligations from the previous permission should also be increased pro rata and re-secured (also see below). Section 106 (s106) obligations are required to secure full long-term public access and access to the servicing area by out of hours cyclists such as night works, and disabled drivers, whenever possible, on request. This could also be addressed through the Delivery and Servicing Plan (DSP) and its supporting conditions.

Site Description

The site has a Public Transport Accessibility Level (PTAL) of 6B, the highest rating, in very close proximity to multiple public transport stations and bus services.

Active Travel

The proposal broadly supports active and sustainable travel, reducing car dominance in line with Healthy Streets indicators. The ATZ assessment has considered suitable routes and modes with day and nighttime access. Public realm improvements including permissive paths and shared surfaces enhance inclusive access and align with Policies T1, T2, T5, D3, D5, D8.

The following local highway improvements identified in the ATZ (Active Travel Zone) assessment should be secured and delivered by the City:

- ROUTE 1 – TO ALDGATE EAST STATION
    - Provide tactile paving on the western side of the crossing at the junction with Fenchurch Street station and reinstate/upgrade tactile paving on the eastern side.
    - Wayfinding signage should be placed to direct pedestrians along the eastern footway of Fenchurch Place instead of the western footway on Fenchurch Place.
- ROUTE 2 – TO LIVERPOOL STREET STATION
    - Reinstate road markings illustrating a contraflow cycle lane on St Mary Axe.
- ROUTE 4 – TO CANNON STREET STATION
    - New tactile paving required at both sides of the informal pedestrian island crossing on Cannon Street.
    - Cycle parking outside Cannon Street station should be repaired / replaced / increased, subject to current occupancy, which has not been mentioned or clearly assessed.
- ROUTE 5 - BANK
    - On the pedestrian approach from Lombard Street, the footways around Bank junction are all shown to be narrow and in poor repair without any tactile paving. This should be addressed if possible but may be more appropriate to form part of a wider City-led highway scheme.
- ROUTE 6 - TOWER HILL STATION
    - Tactile paving should be added to both sides of the Coopers Row Vehicle Crossover as recommended.

The ATZ assessment also fails to assess a serious injury on Mark Lane just south of Dunster Court southeast of the site, simply stating that “Given the overall pedestrian and cycle flows in the study area on a daily basis, the level of recorded collisions is considered low.” The details of the collision should be clarified and discussed further with TfL and City officers prior to determination, in order to determine any necessary mitigation via s278 or s106.

Cycle Parking

The proposed quantum and design of cycle parking aligns with Policy T5 and should be secured by the Council. Provision includes 860 long stay and 48 short stay spaces, with a mix of two-tier racks, vertical racks, and accessible Sheffield stands. End-of-trip facilities including showers and lockers are provided at acceptable ratios, considering site constraints.

Car Parking

The development is proposed to be car-free, with no Blue Badge parking on-site, in line with Policy T6. TfL requests confirmation of accessible on-street Blue Badge parking and step-free access to ensure compliance with Policy D5 Inclusive Design.

Deliveries, Servicing and Construction

The Delivery and Servicing Plan and Outline Construction Logistics Plan should be secured by the Council, in line with Policies T4 and T7. Servicing strategy includes timed restrictions and dual-use public realm/loading bay, with consolidation supported by the City of London.

Network Impact

The Transport Assessment outlines forecast travel demand and trip generation. The assessment is broadly accepted although mitigation measures including cycle improvements and Legible London contributions should be secured. A Travel Plan has been provided and should be secured by the Council.

Planning History and Obligations

An application for a building of 20 storeys above ground (106.35m AOD) at the site wasapproved under Local reference 16/00809/FULMAJ on 29 March 2019; however this subsequently expired on 29 March 2022.

We understand from a Freedom of Information (FOI) request publicly available online that theprevious planning permission secured an off-site Affordable Housing contribution of £597,524.00.

The City should confirm this will be uplifted pro rata for the additional floorspace.

The latest submitted Planning Statement refers to heads of terms to be secured by s106 including Affordable Housing; Highway Works Obligations (to be scoped and agreed); Carbon Offsetting; Cycle Improvements Contribution and a Legible London Contribution.

It should be clarified if any of this can be made available for local or strategic transport improvements such as at Bank.

We understand a Cultural Implementation Strategy will also be secured, in relation to which it should be clarified if this will include plans and provision for visits by large groups. Coach visits by school children should be discouraged due to the lack of available local loading areas and general street space.

TfL will be happy to advise on appropriate locations for signage and local cycle infrastructure improvements in the local area. Please advise if sums have yet been agreed, as this is not in the Planning Statements.

In relation to long-term management of the public space, we understand the following is proposed:

- The public route through the Site would be open to members of the public except between midnight and 6am; and
- The dual use public realm/servicing area on the western side of the ground floor would be publicly accessible, except for the hours of 23:00-07:00 when closed for use as overnight servicing.

The applicant should confirm and planning obligations should secure management arrangements for cyclists arriving out of ours to gain access via the staff and for disabled drivers with a Blue Badge to be given access to the servicing spaces whenever they are unused for deliveries.

Tel: 020 8921 5222

City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Directorate of Place and Growth
The Woolwich Centre, 2nd Floor
35 Wellington Street
London, SE18 6HQ

25/1512/K
25/00529/FULEIA
13 August 2025

DECISION NOTICE – RAISE NO OBJECTION

Dear Sir/Madam,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site:	**130 Fenchurch Street London EC3M 5DJ**
Applicant:	**C/O Agent**
Proposal:	**Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.**
Drawings	

I refer to your letter dated 02 May 2025 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director

From: Active Travel England Planning
To: Pln - CC - Development Dc
Subject: LPA Reference: 25/00529/FULEIA Standing Advice Response
Date: 27 August 2025 14:39:57

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 25/00529/FULEIA

ATE Reference: ATE/25/00647/FULL

Site Address: 135 FENCHURCH STREET, LONDON, EC3M 5DJ

Proposal: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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]]>

[ref:a0zTw000003pw9tIAA;ea4ec548b4b75a58c03145886807cef5:ref]

Outlook

RE: Planning Application Consultation: 25/00529/FULEIA [SG37998]

From NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Date Wed 8/27/2025 17:24
To PLN - Comments <PLNComments@cityoflondon.gov.uk>
Cc NATS Safeguarding <NATSSafeguarding@nats.co.uk>

THIS IS AN EXTERNAL EMAIL

Dear Sirs, NATS acknowledges receipt of the further consultation following minor changes to the scheme and the submission of further information. Its position of No Objection remains valid.

Regards
S. Rossi
NATS Safeguarding Office

NATS

Sacha Rossi
ATC Systems Safeguarding Engineer

D: [redacted]

E: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk

NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 27 August 2025 12:48
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: [SG37998] Planning Application Consultation: 25/00529/FULEIA

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Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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From: OD - Airport Safeguarding BAA
To: PLN - Comments
Subject: Planning Application Consultation: 25/00529/FULEIA
Date: 28 August 2025 10:40:40
Attachments: image.png

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OFFICIAL

Dear Sir/Madam,

CAA Building Notification
As the proposed development exceeds 91.4m AGL, upon grant of permission, City of Council are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/DDPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince | Airport Planning Manager

On behalf of Heathrow Airport Ltd.

Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU
United Kingdom
T: [redacted] | M: [redacted]
W: WEBSITE [redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 27 August 2025 12:48
To: OD - Airport Safeguarding BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 25/00529/FULEIA

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Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London

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Outlook

Re: Planning Application Consultation: 25/00529/FULEIA

From DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Date Thu 8/28/2025 10:46
To PLN - Comments <PLNComments@cityoflondon.gov.uk>

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the proposed amendments for the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Building Notification
As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince | Airport Planning Manager

On behalf of Heathrow Airport Ltd.

AIRPORT SAFEGUARDING LIMITED

Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU
United Kingdom
T: [redacted] | **M:** [redacted]
WEBSITE [redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

CYRRUS BRIGHTON CITY AIRPORT

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 27 August 2025 12:48
To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 25/00529/FULEIA

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Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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LPA Ref: 25/00529/FULEIA

London City Airport Ref: 2025/LCY/223

Date: 28/08/2025

Dear Alex Thwaites,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	25/00529/FULEIA
Proposal	Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development. RE-CONSULTATION
Location	130 Fenchurch Street London EC3M 5DJ
Borough	City of London
Case Officer	Alex Thwaites

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on [specify the building(s) or other structure(s)]. These obstacle lights must be steady state red lights with a minimum intensity of [specify 32 or 2000 candelas] Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development [if possible specify the part(s) of the development] to avoid endangering the safe movement of aircraft and the operation of London City Airport.

Photovoltaic cells (Glint & Glare) Condition

No solar photovoltaic panels shall be fixed in place until the developer has completed a "Glint and Glare Assessment" which has been submitted to and approved in writing by the Local Planning Authority in consultation with London City Airport. Installation, operation, and maintenance of the solar photovoltaic panels shall thereafter be in accordance with the approved "Glint and Glare Assessment", which is approved by London City Airport.

Reason: London City Airport requires a glint and glare assessment to determine the full impact on Air Traffic Control facilities and pilots.

We would also like to make you aware of the following:

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).
The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport, or not to attach conditions which London City Airport has advised, it shall notify London City Airport, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Simon Vince
On behalf of London City Airport

Outlook

RE: Planning Application Consultation: 25/00529/FULEIA

From Devcon Team <devcon.team@thameswater.co.uk>
Date Thu 8/28/2025 14:05
To PLN - Comments <PLNComments@cityoflondon.gov.uk>

THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for your e-mail.

Having reviewed the application we note that there are no changes to the figures in the application and therefore our comments remain the same and conditions still stand as per our previous response dated 27 May 2025.

Kind Regards,

Saira Irshad
Development Planner
Asset Management & Engineering
Tel: 0203 577 9956
devcon.team@thameswater.co.uk

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 27 August 2025 12:48
To: Devcon Team <devcon.team@thameswater.co.uk>
Subject: Planning Application Consultation: 25/00529/FULEIA

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Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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Visit us online https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C8b33c87299514d3b28e108dde6338346%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638919831142422467%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=MbMYVsZ%2FFl5arGU7boGv3fh9smut%2B5E0Hkh%2BmlTAEUc%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%7C8b33c87299514d3b28e108dde6338346%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638919831142446534%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=%2BCFOV9ZrTH1Wy5h8VG%2BewBhALvuxXXrE7PDoUDEQuy0%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%7C8b33c87299514d3b28e108dde6338346%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638919831142472424%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=8y6%2F1BL8qSuiS%2FkxPfwFU84%2FVDPD7EiONeD8pMnlskM%3D&reserved=0. We're happy to help you 24/7.

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Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

29 August 2025
Crossrail Ref: CRL-IP-3496

Dear Alex Thwaites,

25/00529/FULEIA : 130 Fenchurch Street London EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.
[RECONSULTATION under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) following receipt of further information in relation to the Environmental Statement, including further testing to wind microclimate for off-site terraces at 50 Fenchurch Street outlined in the letter dated 22 August 2025. Minor amendments to the Proposed Development include changes to balustrade heights to terraces and internal layout alterations].

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 27 August 2025, requesting the views of TfL on the above application. I confirm that this application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Safeguarding Officer (Elizabeth line)
TfL Infrastructure Protection Team
Floor 7 Red Zone: 5 Endeavour Square : London : E20 1JN

……

Note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Outlook

RE: Planning Application Consultation: 25/00529/FULEIA (Our ref 25-0635)

From PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Date Tue 9/2/2025 13:13
To PLN - Comments <PLNComments@cityoflondon.gov.uk>

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number in all future correspondence

Kind regards

Lisa Gaskill | Operational Support | Planning Gateway One
Health and Safety Executive | Building Safety Division
planninggatewayone@hse.gov.uk

PROTECTING PEOPLE AND PLACES

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 27 August 2025 12:49
To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Subject: Planning Application Consultation: 25/00529/FULEIA

Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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https://eur03.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7CPlanningGatewayOne%40hse.gov.uk%
7Cf93f5234c5aa49b09d8608dde55faade%7C6b5953be6b1d4980b26b56ed8b0bf3dc%7C0%7C0%7C63891892
1369635180%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXa
W4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=i032OUg%2BrNu64OsMJ5uH8oggCpO
HMF0vXdvYE22QdGY%3D&reserved=0

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhowch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

From: [redacted]
To:
Cc:
Subject: FW: 25/00529/FULEIA - 130 Fenchurch Street London EC3M 5DJ
Date: 04 September 2025 09:45:13
Attachments: ufm77_English_Heritage_Consultation_Email.pdf
130 Fenchurch Street rec cond_232341.pdf

THIS IS AN EXTERNAL EMAIL

Hi Alex
Thank you for consulting me on this amended application. The proposed amendments do not affect my previous advice, which I have attached for information
Kind regards
Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London
Greater London Archaeology Advisory Service (GLAAS)
Phone: [redacted] Mobile: [redacted]

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill. London EC4R 2YA

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SUVCH9FHK4S00

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Alex Thwaites
[redacted]

Details
OUR REF: 25/00529/FULEIA
ADDRESS: 130 Fenchurch Street London EC3M 5DJ (Grid Reference: 533213, 180953)
PROPOSAL: Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

[RECONSULTATION under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) following receipt of further information in relation to the Environmental Statement, including further testing to wind microclimate for off-site terraces at 50 Fenchurch Street outlined in the letter dated 22 August 2025. Minor amendments to the Proposed Development include changes to balustrade heights to terraces and internal layout alterations].

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creating a better place
for people and wildlife

Environment Agency

Alex Thwaites
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/138147/02-L01
Your ref: 25/00529/FULEIA

Date: 11 September 2025

Dear Alex

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (class E(g)), culture (class F1/e), public viewing gallery (sui generis), flexible retail (class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

[RECONSULTATION under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) following receipt of further information in relation to the Environmental Statement, including further testing to wind microclimate for off-site terraces at 50 Fenchurch Street outlined in the letter dated 22 August 2025. Minor amendments to the proposed development include changes to balustrade heights to terraces and internal layout alterations].

130 Fenchurch Street London EC3M 5DJ

Thank you for consulting us on the above planning application. There are no environmental constraints within our remit at this site, and therefore **we have no comments** on application. Please consider the general advice on water resources, for which we recommend the applicant considers for this application.

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract

investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your local planning authority for more information.

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me on HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely

Mr Andy Goymer
Planning Specialist

Direct dial 0203 025 5486
Direct e-mail HNLSustainablePlaces@environment-agency.gov.uk

From: [redacted]
To:
Subject: Port of London Authority response Plan ref: 25/00529/FULEIA 130 Fenchurch Street
Date: 11 September 2025 14:54:36

THIS IS AN EXTERNAL EMAIL

FAO: Alex Thwaites

Dear Alex

Thank you for consulting the Port of London Authority (PLA) on the re-consultation for the above mentioned planning application, for the;

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

At 130 Fenchurch Street, London. I have now had the opportunity to review the submitted documents and can confirm the PLA has no comments to make

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
T: [redacted] | *M:* [redacted]

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From:	SM-NE-Consultations (NE)
To:	PLN - Comments
Subject:	Planning Application Consultation: 25/00529/FULEIA
Date:	12 September 2025 15:01:56
Attachments:	image001.png ufm57_Standard_Consultation_Email.pdf

THIS IS AN EXTERNAL EMAIL

Dear Alex Thwaites

Our ref: **526045**
Your ref: **25/00529/FULEIA**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **14 May 2025** reference number **(511790)**.

The advice provided in our previous response applies equally to this **amendment** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

David Reid
Officer
Natural England
Consultation Service
Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate

account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 27 August 2025 12:48
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: Planning Application Consultation: 25/00529/FULEIA

Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Alex Thwaites
Environment Department
City of London
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EASTERN CITY

Environment Department
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Submitted via email to PLNComments@cityoflondon.gov.uk

FAO: Alex Thwaites, Planning Case Officer

Planning Application Ref: 25/00529/FULEIA

Re: Planning Consultation for 130 Fenchurch Street EC3M 5DJ

June 2025

Dear Alex,

The Eastern City is proud to be making a representation in relation to the above planning application. We are a Business Improvement District (BID) covering the tall building cluster in the City of London. Our investment partnership is made up of the businesses that call this part of the Square Mile home, primarily financial and professional services companies that make up around 40% of the businesses in this area.

We operate under a mandate from those paying member businesses to deliver our Business Plan (2022-2027), providing hyper local area wide projects and services to support business growth and vibrancy, working with occupiers, property owners and developers and our public sector partners.

Given our holistic and strategic approach, it is appropriate that we make representations on key planning applications, and in particular, those that have an impact on the wider area, public amenity provision and ground floor public realm.

For clarity, it is not the role of the BID to explicitly support or oppose any specific planning application and this is not the purpose of this letter. Rather, we view aspects of the above application in relation to our published evidence base – namely our Public Realm Vision (2024) – which is rooted in insight, data and consultation with our member businesses, key stakeholders and the public.

We are supportive of the significant development pipeline and projected growth in the area. We see this as a positive thing for the Eastern City, bringing benefits such as increased vibrancy and economic growth to this globally important area and unique part of the City. This is an area that has driven change for 2000 years, a hub of economic activity and the growing Destination City agenda. We are excited about the opportunities provided by the future growth of the area.
In the context of this growth, our public realm and the 'spaces between the buildings' are ever more important.

We are grateful to the developer for their consultation and positive engagement with the BID through the planning process. We have shared our Public Realm Vision with them and drawn specific attention to the development's strategic location in the Eastern City, aligned with the project family routes set out in the document. We would urge consideration of these priority

areas in relation to the proposed development's wider context. In addition, the Public Realm Vision outlines our seven key principles, which are:

Welcoming publicly accessible spaces – designing spaces that are inviting and accommodating;

Resilient trees and planting – ensuring the area is as green as possible;

Lively uses and activity – creating a dynamic and energetic place;

Intuitive navigation – making it easier to reach your destination;

Historic character and lighting – celebrating and improving the heritage features;

A mobility environment which is accessible to all – establishing environments where modes of movement can co-exist;

A safe and secure neighbourhood – promoting spaces where all users feel safe.

Considering the above scheme against these principles, we welcome a number of provisions in the application and look forward to continuing our work with the developer should the scheme receive approval. We have already successfully delivered a 'meanwhile' vinyl installation on Fountain House and are working with the developer's arts consultants Futurecity on further meanwhile activations on the 130 Fenchurch Street site. To date, our interactions with the developer and their consultants have been overwhelmingly positive.

Whilst the proposed project supports all of our principles outlined above, we specifically wish to draw attention to the following aspects of this application;

New routes for pedestrians providing significantly enhanced connectivity, good alignment with the project family routes set out in our Vision;

A significantly improved public realm experience to help reanimate this section of Fenchurch Street through new ground floor food and beverage uses, and a new pedestrian connection from Cullum Street to Fen Court, recognising the value of this as a green space in the area

We hope this is a helpful contribution ahead of the committee meeting.

Yours sincerely

[redacted]

Nick Carty
Chair, Eastern City