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Planning Applications Sub-Committee

Date: **TUESDAY, 8 JULY 2025**

Time: 10.30 am

Venue: **LIVERY HALL - GUILDHALL**

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin KC
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
Gaby 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

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

1. **APOLOGIES**

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

3. **MINUTES**

   To agree the public minutes of the Planning Applications Sub-Committee meeting held on 28 May 2025.

   For Decision
   (Pages 5 - 28)

4. **63 ST MARY AXE**

   Report of the Chief Planning Officer and Development Director.

   For Decision
   (Pages 29 - 664)

5. **85 GRACECHURCH STREET**

   Report of the Chief Planning Officer and Development Director.

   For Decision
   (Pages 665 - 1074)

6. **38 - 41 FURNIVAL STREET AND 31 - 33 HIGH HOLBORN**

   Report of the Chief Planning Officer and Development Director.

   For Decision
   (Pages 1075 - 1310)

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

   Report of the Chief Planning Officer and Development Director.

   For Information

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

Report of the Chief Planning Officer and Development Director.

For Information

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

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

PLANNING APPLICATIONS SUB-COMMITTEE
Wednesday, 28 May 2025

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Wednesday, 28 May 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 the 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

Committee:	**Date:**
Planning Application Sub Committee	8th July 2025
Subject: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.	**Public**
Ward: Bishopsgate	**For Decision**
Registered No: 25/00223/FULEIA	**Registered on:** 03/03/2025
Conservation Area: No	**Listed Building:** No

Summary

I. The application relates to a site 0.389 hectares in size and which is bound by Camomile Street, Houndsditch, Outwich Street and St Mary Axe. The site currently consists of two buildings which were built in the 1980s: 63 St Mary Axe and Camomile Court. The application site is not situated within a conservation area, nor are either of the buildings listed. Within the basement levels there is a Scheduled Monument known as London Wall: Remains of Roman Wall and Bastion, Camomile Street. Beneath the southern edge of the site there is potential for archaeological remains forming part of the former Churchyard of St Augustine Papey, which is an above ground and below ground Non-Designated Heritage Asset (NDHA).

II. Planning permission is sought for the demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the

Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

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

IV. Objections and observations have been received from Statutory consultees including Historic England- GLAAS, Historic England, The Council for British Archaeology, Historic Royal Palaces, The City of London Archaeological Trust and third parties including on behalf of The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London. Across the two rounds of consultations, a total of two objections were received. The grounds of objection included the size and design of the development, its impact on designated and non-designated heritage assets, the loss of the burial ground and remains and the impact on the environment and amenity of the surrounding buildings. This report has considered the concerns raised and where there is clear disagreement, clear reasoning has been provided in this report. Further to this, any requisite mitigation would be secured by conditions or S106 obligations.

V. The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development in the City Cluster as defined in the Local Plan 2015 and emerging City Plan 2040, 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.

VI. The scheme would provide 85,624sqm sqm (GIA) of commercial office floorspace (Use Class E (g)), which would be flexible, sustainable Grade A office floorspace suitable for circa 4,500 FTE city workers. The proposal would make a significant contribution to the City's growth modelling and would deliver nearly 4.23% of the required commercial space to meet projected economic and employment growth demand until 2040. The

quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international financial and professional services business centre. The office floorspace has been designed to be flexible and adaptable for a range of occupier needs and future demand.

VII. Alongside the office floorspace, a range of flexible uses are proposed on ground floor and the lower levels of the building. Working with a Cultural Partner and Social Enterprise Partner on the lower levels of the building, combined with the creation of Camomile Park, the elevated walkways and retail units, the development would support the aspirations of Destination City to increase footfall and become a 7-day week inclusive destination. The development would create a new pleasant place in the City to linger, enjoy and experience, rather than just pass through.

VIII. The proposals would optimise the use of land, delivering high quality office space and a multi-layered series of publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would contribute Good Growth by design and be in accordance with all Local Plan policies including, DM3.3, CS7, CS10, CS14, CS16, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies, S10, AT1, S8, DE2, DE3, S14, S21 and OS1, London Plan policies D3, D4, D8, T1, T2, T4 and G4, and the policies contained within the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3, 5 and 6.

IX. The proposals are classed as a tall building under adopted and emerging policy, and the site is not located in an area identified as inappropriate for a tall building in the City's Local Plan. Officers have thoroughly assessed the proposals and as a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, B, C and D, Local Plan Policy CS7, CS 14, emerging City Plan S12, S21.

X. The proposal would be a striking, ambitious addition to the Cluster, being of a unique architectural character that would combine pragmatism and playfulness in equal measure; it would expand London's public realm and urban greening though open and engaging lower floors, which, combined, would make a significant beneficial contribution to the landmark qualities of the building, befitting the pivotal location of the site at the north eastern edge of the City Cluster. This is in accordance with London Plan policies Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, and relevant sections of the NPPF. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2, DE3 and DE4

(1 and 2), London Plan D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

XI. Extensive consideration of the City's and London's important views in designing the proposals, and they would accordingly comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF London Panoramas, officers conclude the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.

XII. The proposal has been painstakingly shaped by consideration of views of the Tower of London World Heritage Site (WHS) and it would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the WHS, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

XIII. The proposals would enhance the significance of the Churchyard of St Augustine Papey (NDHA) and the significance of the London Wall Scheduled Ancient Monument. It would also preserve the significance (via change in the setting) of heritage assets and an appreciation of that significance. As such, the proposals would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

XIV. There is high potential for the survival of medieval and later burials within the former churchyard and archaeological remains from periods before this; proposals would remove all archaeological deposits on the site if these survive so could have an impact on these. This impact is considered to be appropriately and effectively managed through the use of conditions attached to this permission, with a PhD studentship proposed alongside the usual measures to oversee and manage the recording, excavation and subsequent study of the burials if these are present, a particularly noteworthy and rigorous arrangement to maximise the potential for this site to advance archaeological knowledge in various ways. Subject to the conditions and S106 obligations, the proposal would comply with policies DM12.4 of the Local Plan, policy HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

XV. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The microclimate, thermal comfort, ground conditions,

solar glare, light spill, air quality and noise credentials of the development are acceptable subject to mitigation, conditions and S106 obligations where relevant. The proposals would result in daylight and sunlight impacts to surrounding residential dwellings. However, considering the BRE Guidance, the location of the application site and impacted residential properties within the Cluster, the dense urban environment of the City particularly the Cluster, and any reasonable increase in massing, which accords with the aims of the development plan and the priorities of the CAZ on the delivery of floorspace, the impact of the above mentioned residential properties are considered acceptable in this instance and not considered to result in a reduction to unacceptable levels. Further to this, in the proposed development in the cumulative scenario only, one amenity space (Devonshire Square A) would not comply with BRE guidance as there would be an 100% loss in terms of the area of this space receiving at least two hours of direct sunlight, the impact on this space is acknowledged and officers consider the benefits of the proposal outweigh the harm caused to this space.

XVI. In transportation terms, the proposals would align with aspiration set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The proposal would provide a betterment of local public realm and the highway (though S278 Agreement and contribution to the London Wall Corridor Study and works to the south of the building), and with these improvements the additional pedestrian trips on the transport network can be accommodated. Demolition and construction methodologies would be secured by condition and proposals agreed between the Highways Authority and the appointer contractor, in accordance with construction regulations and logistic guidance. The proposed development would take delivery servicing off the street as it would provide an on-site delivery and servicing area, with all vehicles being to access and egress in forward gear, and with sufficient consolidation secured through a delivery and servicing management plan.

XVII. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. Whilst proposed development would incorporate a large basement (accommodating plant, cycle parking and end of trip facilities), which has an high embodied carbon impact, it is considered that this is required to unlock the greatest number of benefits that would contribute to the wider sustainability and future proofing of the City, this includes optimising the delivery of highest quality office floorspace whilst integrating greening, community and retail uses across multiple levels, benefits which could not be delivered through retrofit where extension and opening up potential was significantly limited, as demonstrated in the pre-development analysis. The building would be designed to high sustainability standards including an increase in local greening and ecological value, operational energy efficiency (including a leading reduction in cooling

demand), targeting BREEAM ‘Outstanding’ and NABERS UK rating of 5 stars and adopting Circular Economy Principles. The Proposed Development is also one of the first to include a specific ‘Cool Routes’ strategy detailing how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate.

XVIII. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Eastern Cluster and public realm would be complied with, and polices relating to design, heritage, tall buildings and strategic views of the local plan would be complied with. Whilst there would be conflict polices S8 (17), S12(h) and DE4(3) of the emerging City Plan 2040 due to the lack of an elevated public space, and policy DE7 of the emerging City Plan as the impact of the proposed development on the nearby hotel have not been assessed, the proposals comply with the development plans when considered as a whole.

XIX. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and businesses objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.

XX. Virtually no major development proposal is in complete compliance with all polices and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

XXI. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

XXII. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. The 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 the S106 agreement.

XXIII. Paragraph 11 of the NPPF sets out that there is a presumption in favour of sustainable development. For decision makers that means approving

development proposals that accord with an up-to-date development plan without delay.

XXIV. As set out in paragraph 215 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 215 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.

XXV. 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 in the schedules attached.

Recommendations

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

- 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.

II. 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).

III. The application be referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) (England) Direction 2024 and the application not being called in under Section 77 of the Town and Country Planning Act 1990.

IV. That the Department for Digital, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.

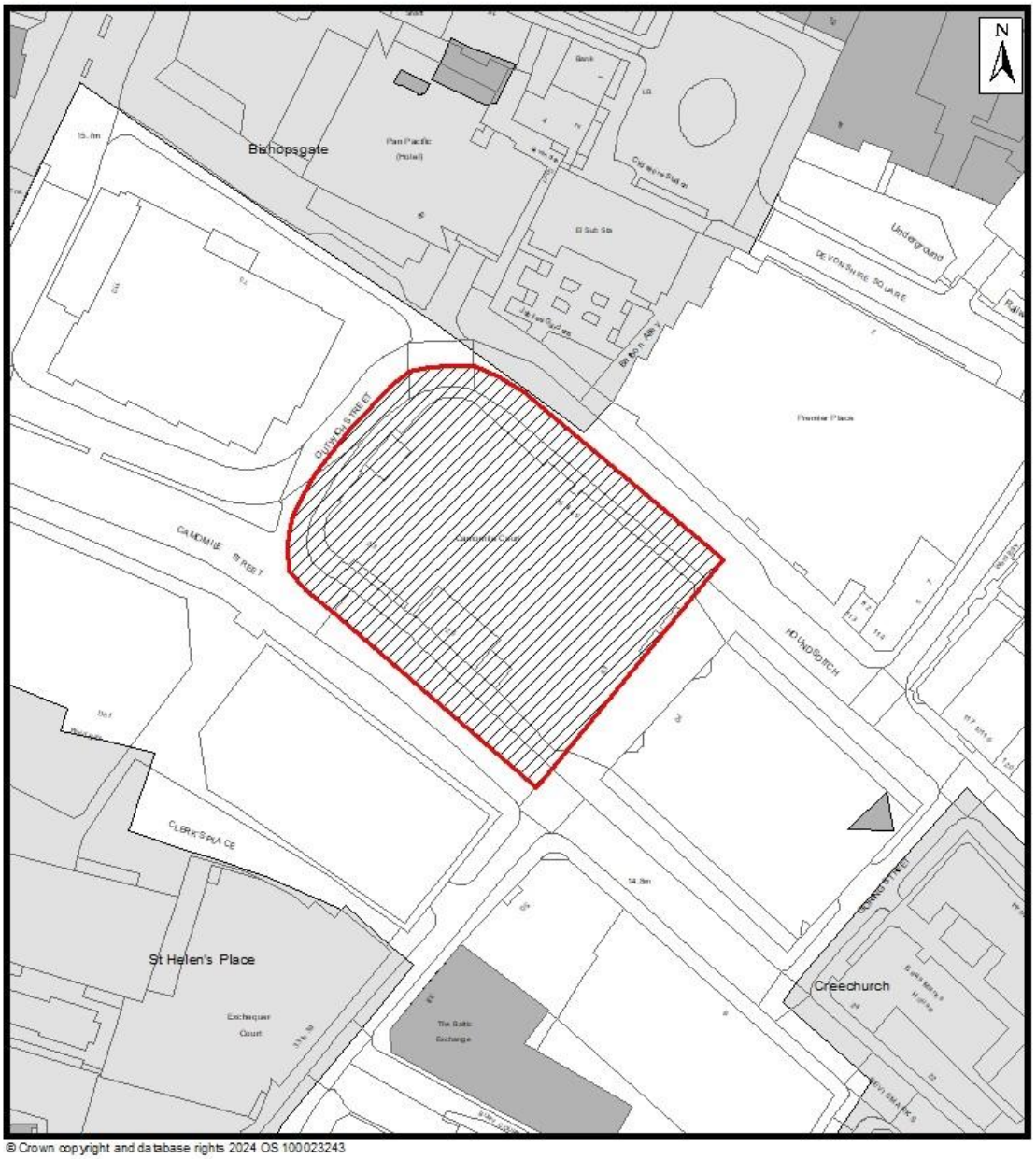
V. That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278/38of the Highways Act 1980.

VI. That you agree in principle 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 be instructed to 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.

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

SITE LOCATION PLAN

Site Location Plan



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ADDRESS:
63 St. Mary Axe

CASE No.
25/00223/FULEIA

SITE LOCATION
LISTED BUILDINGS
CONSERVATION AREA BOUNDARY
CITY OF LONDON BOUNDARY

CITY OF LONDON
ENVIRONMENT DEPARTMENT

SITE PHOTOS

Existing view of the site from south-west:



Existing view from North-west:



Existing view from north east:



Existing view from southeast:



Existing south elevations and historic Churchyard:



APPLICATION COVER SHEET

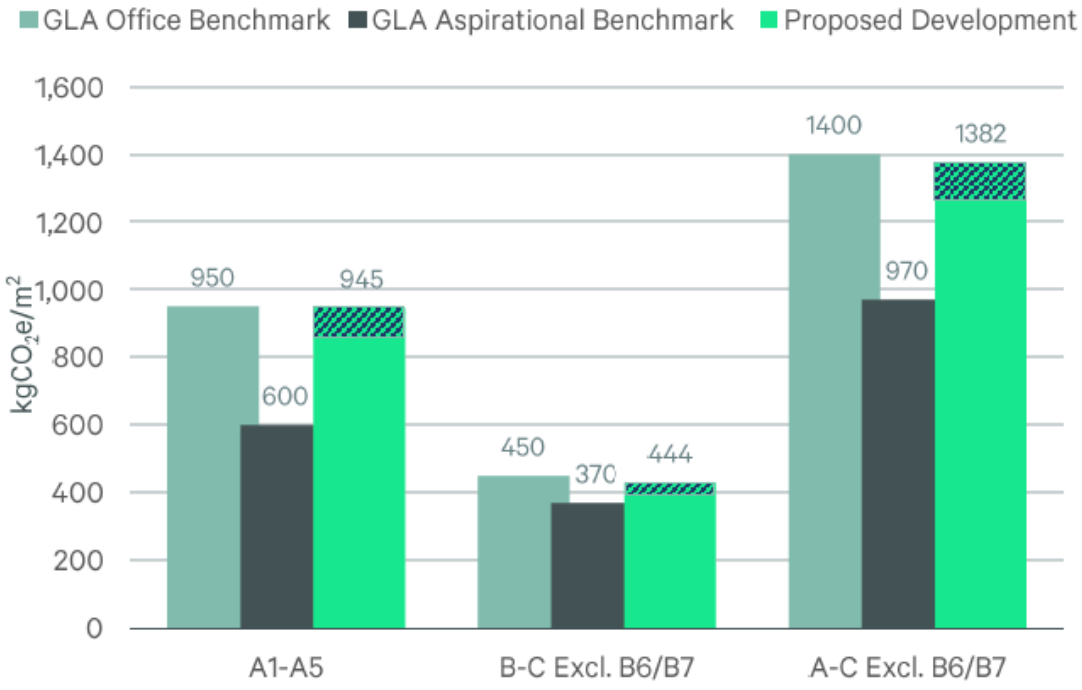
63 St Mary Axe

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	Camomile Court: Ground plus 6 storeys, 1 basement level; 47m AOD/32.4m AGL 63 St Mary Axe: Ground plus 8 storeys, 2 basement levels; 50.6m AOD/36m AGL		Ground plus 45 storeys, 6 basement levels; 190.65m AOD / 176m AGL	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Commercial Office E(g)(i)	17,892.3	E(g) – offices	85,624
	Gym (F2)	717.6	E(a/b/c) - retail/food and beverage/professional services	125
			E(b/g) – food and beverage/ offices	1,849
			E(a/b/g)/F1/F2 – retail/food and beverage/offices/ learning and non-residential institutions/local community	205
			E(b/g)/F1/F2 – food and beverage/offices/learning and non-residential institutions/local community	1,827
			Sui generis – Multi Function Space	461
			Sui generis – Public lavatory	8

			Basements (ancillary)	11,363
	TOTAL	**18,609.9**	**TOTAL**	**101,462**
3. OFFICE PROVISION IN THE CAZ	Existing		17,892.3sqm (GIA)	
	Proposed		85,624sqm (GIA)	
	Uplift		**67,731.7sqm (GIA)**	
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	1,789		4,500 employees daily	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	n/a	Car parking spaces	2 (blue badge)
	Cycle long-stay	n/a	Cycle long-stay	1,463
	Cycle short-stay	n/a	Cycle short-stay	101
	Lockers	n/a	Lockers	146
	Showers	n/a	Showers	147
	Changing facilities	n/a	Changing facilities	1,463
6. HIGHWAY LOSS / GAIN	Loss: 17.4sqm Gain: 21.9sqm NET: +3,5sqm			

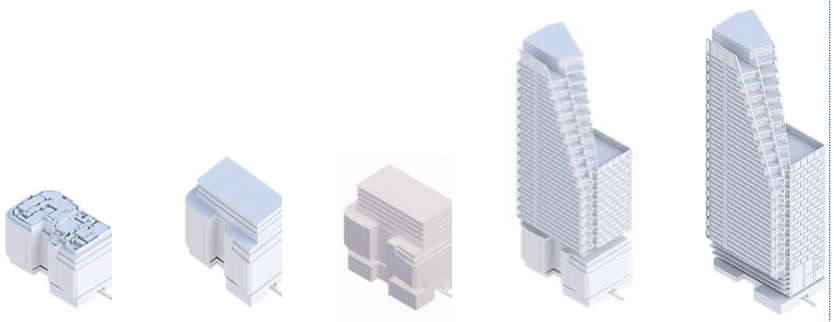
7. PUBLIC REALM	The existing site provides 120 sqm of public realm. The proposed development will provide the following: • 795 sqm of external ground floor public realm • 350 sqm of publicly accessible green elevated walkways • 360 sqm of publicly accessible internal walkways and covered public realm	
8. TREES	EXISTING	PROPOSED
	0	GF: 8 trees Terraces: 4 trees Balconies: 64 Total: 76
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	35/day	64 trips a day (50% consolidation).
10. SERVICING HOURS	Refuse, recycling and glass collections between 8pm and 11pm and all other delivery and servicing between 11pm and 7am. All delivery and servicing is required to take place in the on-site loading bay.	
11. RETAINED FABRIC	Substructure retained: <5% Superstructure (Frame) retained: 0% Superstructure (Facades) retained: 0%	

	Total retention (substructure and superstructure combined): <1%
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 33% GLA requirement: 35%
13. OPERATIONAL CARBON EMISSIONS	132,122 tonnes CO2e over 60 years (not accounting for grid decarbonisation) 1,302 kgCO2e/m2 over 60 years (not accounting for grid decarbonisation)
14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS



Upfront embodied carbon: 95,883 tonnes CO2e / 945 kgCO2e per square meter

Embodied carbon: 140,210 tonnes CO2e / 1,382 kgCO2e per square meter

15. WHOLE LIFE-CYCLE CARBON EMISSIONS	Total WLC (embodied and operational): 272,332 tonnes CO2e Total WLC (embodied and operational) per square meter: 2,684 kgCO2e/m2
	CARBON OPTIONEERING
16. WHOLE LIFE-CYCLE CARBON OPTIONS ASSESSMENT	

	Option 1	Option 2a	Option 2b	Option 3	Option 4
Gross Internal area (GIA) m^2	14,510	16,638	19,645	93,428	93,428
Increase in GIA (over existing)	0	2,128	5,135	78,918	78,918
Substructure % retained (by mass)	95	80	70	50	20
Superstructure % retained (by mass) (*frame, upper floors, roof, stairs, ramps*)	100	80	60	25	0
Superstructure % retained (by area) (external walls, windows, doors)	100	60	0	60	0
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *exc. Sequestration*	**39**	**282**	**485**	**741**	**837**
In-use & End of Life Embodied Carbon (B-C) ($kgCO_2e/m^2$ GIA) *excl. B6 & B7*	390	351	351	351	351
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	**429**	**633**	**836**	**1,092**	**1,188**

	Whole Building Operational Carbon for building lifetime (B6)($kgCO_2e/m^2$ GIA) (inc. decarbonisation)	**1,716**	**138**	**108**	**108**	**85**
	Total WLC Intensity (inc.B6, pre demolition) ($kgCO_2e/m^2$ GIA)	**2,145**	**780**	**958**	**1,205**	**1,280**
	Upfront Embodied carbon (A1-A5) (tCO_2e)	566	4,692	9,528	69,230	78,199
	In-use embodied carbon (B-C)(tCO_2e)	5,659	5,840	6,895	32,793	32,793
	Operational carbon for building lifetime (B6) (tCO_2e)	24,904	2,300	2,112	10,045	7,893
	Total absolute WLC (inc. B6 & pre-demolition) (tCO_2e)	**31,129**	**12,977**	**18,826**	**112,613**	**119,611**
17. TARGET BREEAM RATING	Target of BREEAM "Outstanding" for the office space Target of BREEAM "Excellent" for the retail space Policy Target: Excellent					
18. URBAN GREENING FACTOR	0.58 (London Plan requirement of 0.3)					
19. BIODIVERSITY NET GAIN	The Proposed Development will deliver a net gain for biodiversity, with an increase in habitat units of 6943.64 % when compared to the baseline.					
20. AIR QUALITY	The proposed development is Air Quality neutral					

Main Report

Environmental Statement

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

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

3. The Council issued an EIA Scoping Opinion (24/00734/SCOP) on the 13 September 2024. The following topics were scoped in:
   - Air Quality
   - Archaeology
   - Climate Change and GHG Emissions
   - Daylight, Sunlight, Overshadowing, Light Trespass and Solar Glare
   - Noise and Vibration
   - Townscape, Built Heritage and Visual Impact Assessment
   - Wind Microclimate

   The following topics were scoped out:

   - Traffic and Transport
   - Health
   - Ecology and Biodiversity
   - Geo-environmental and Geotechnical Conditions
   - Socioeconomics
   - Water Resources, Drainage and Flood Risk
   - Waste and Materials
   - Project Vulnerability, Major Accidents and Disasters
   - Aviation

   The submitted ES accords with the Scoping Opinion issued.

4. 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.

5. A local planning authority must not grant planning permission unless satisfied that reasoned conclusion is up to date, if, in the opinion of the relevant planning authority, it addresses significant effects of the proposed development on the environment that are likely to arise as result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of 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.

6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by another 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.

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

8. The Applicant provided further information to support the submitted Environmental Statement, which was published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 on May 2025. The additional information (being further information and any other information) which forms part of the environmental information is also available online with any further representations received in conjunction with the information.

9. The interaction between the likely significant effects have been considered in the assessment. Mitigation and monitoring measures are proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement as appropriate.

Site and surroundings

10. The application site is approximately 0.389 hectares and is bound by Camomile Street, Houndsditch, Outwich Street and St Mary Axe. The site currently consists of two buildings which were built in the 1980s; 63 St Mary Axe and Camomile Court.

11. 63 St Mary Axe is located in the south/southeastern portion of the site and consists of two basement levels, ground and eight upper storeys. The building has a height of 50.6m AOD. Camomile Court is located in the north/northwestern part of the site and consists of basement and ground floor and six upper storeys. The building has a height of 47m AOD. In addition, there is a landscaped area recessed into the southern facade of Camomile Court, which was formerly the churchyard to the Church of St Augustine Papey. The existing buildings within the site provide 17,892.3sqm GIA of office floorspace.

12. The application site is located in the Eastern Cluster as defined in the Local Plan 2015; it is noted the site is on the eastern edge of the Cluster. In the emerging City Plan 2040, the application site is situated within the City Cluster Tall Buildings Area. The Eastern Cluster is characterised by the cluster of tallest buildings and highest density of businesses of business activity in the City.

13. The surrounding area is high density and is primarily commercial in nature with some residential properties, religious buildings and some retail units. To the north of the site at One Bishopsgate Plaza (ground plus 45 storeys) is the Pan Pacific Hotel and the Sky Residences apartments. There are other residential properties situated to further to the north and east and some to the west and south. To the northwest is the Salesforce Tower at 46 storeys, to the southwest is 100 Bishopsgate at 40 storeys and to the immediate southeast is 70 St Mary Axe (21 storeys). The centre of the Cluster is situated to the southwest of the application site. To the north and east, buildings step down in height, with lower rise buildings of a smaller grain and scale.

14. The site lies approximately 720m northwest of the Tower of London World Heritage Site.

15. The application site is not situated within a conservation area nor are either of the buildings listed buildings. The application site is adjacent to the Bishopsgate Conservation Area, which wraps around the north and west of the site. The St Helens Place Conservation Area is located to the south of the application site. Creechurch Conservation Area is located to the southeast of the site.

16. Within the basement levels on the site there is a Scheduled Monument known as London Wall: Remains of Roman Wall and Bastion, Camomile Street' and beneath the southern edge of the site there is potential for archaeological remains forming part of the former churchyard of St Augustine Papey, which is a Non-Designated Heritage Asset (NDHA).

17. There are a number of designated and non-designated heritage assets in the immediate vicinity of the site. These include:

- 38 St Mary Axe (The Baltic Exchange) (Grade II)
- Church of St Helen Bishopsgate (Grade I)
- Devonshire Square Group including Port of London Authority's Warehouses, Entrance Gatepiers, East and West Entrance Houses
- 1,3 & 5 Stone House Court (Grade II)
- Church of St Botolph Without Bishopsgate (Grade II*)
- St Botolph's Church Hall (Grade II)
- 2 Drinking Fountains, 3 overthrows and Lanterns, Bishopsgate Churchyard (Grade II)
- Bishopsgate Parish Memorial (Grade II)
- The Bevis Marks Synagogue (Grade I)
- Guild Church of St Ethelburga the Virgin (Grade I);
- Hasilwood House 52-68 Bishopsgate (Grade II);
- Bishopsgate Conservation Area;

18. Other designated and non-designated heritage assets in the wider area include:
    - Church of St Andrew Undershaft (Grade I) and Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II)
    - Lloyd's Building (Grade I)
    - 13 Bishopsgate (Grade I)
    - Church of All Hallows (Grade I)
    - Royal Exchange (Grade I)
    - Finsbury Circus Registered Historic Park and Garden (Grade II)
    - London Wall Buildings (25 London Wall) & Salisbury House (31 Finsbury Circus) (Grade II)
    - Former Port of London Authority (10 Trinity Square) (Grade II*)
    - The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
    - St Paul's Cathedral (Grade I);
    - Tower Bridge (Grade I);
    - Royal Exchange (Grade I);
    - St Katherine Cree (Grade I);
    - Church of St Botolph, Aldgate (Grade I);
    - Sir John Cass School (Grade II*)
    - The Monument (Scheduled Monument and Grade I);
    - 13 Bishopsgate (Grade I) ;
    - Former Port of London Authority (Grade II*);
    - Holland House (1-4 Bury Street) (Grade II*);
    - Leadenhall Market (Grade II*);
    - Lloyd's Registry, 71 Fenchurch Street (Grade II*);
    - Bishopsgate Institute (and 6 Brushfield Street) (Grade II*);
    - Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II);
    - Gateway in yard of Church of St Katherine Cree (Grade II);

- Liverpool Street Station (Grade II);
- 46 Bishopsgate (Grade II);
- 48 Bishopsgate (Grade II);
- Park House and Garden House (Grade II);
- Finsbury House (Grade II);
- London Wall Buildings (Grade II);
- 139- 144 Leadenhall Street (Grade II);
- 147-148 Leadenhall Street (Grade II);
- 38 St Mary Axe (The Baltic Exchange) (Grade II);
- 20 and 21 Billiter Street (Grade II);
- 2-16 Creechurch Lane (Grade II);
- 10 Brushfield Street (Grade II);
- 14 Brushfield Street (Grade II);
- Leadenhall Conservation Area;
- Bank Conservation Area;
- Creechurch Conservation Area;
- Finsbury Circus Conservation Area;
- The Tower of London Conservation Area;
- Bunhill Fields and Finsbury Square Conservation Area;
- St James Park Registered Historic Park and Garden (Grade I);
- Finsbury Circus Registered Historic Park and Garden (Grade II);
- Bunhill Burial Ground Registered Historic Park and Graden (Grade I)
- 113-116 Leadenhall Street (Non-designated heritage asset);
- Liverpool Street Arcade (Non-designated heritage asset);
- 33-34 Bury Street (Non-designated heritage asset);
- 18-20 Creechurch Lane (Cree House) (Non-designated heritage asset);
- 24 Creechurch Lane (Fibi House) (Non-designated heritage asset);
- 12-14 Mitre Street (Mitre House) (Non-designated heritage asset);
- 27-31 Mitre Street (Non-designated heritage asset);
- 30 St Mary Axe (Non-designated heritage asset); and
- Liverpool Street Arcade (Non-designated heritage asset)

Planning History

19. The recent planning history for the application site is set out below:
    - On the 8th April 2008 planning permission (08/00151/FULL) was granted for the replacement of circular entrance doors with a new glass box entrance lobby.
    - On 15th August 2011 planning permission (11/00306/FULL) was granted for the extension and alteration at upper floor level to create two additional floors, and external alterations at lower floor levels, to create additional office B1 floorspace.
    - On 1st December 2011 planning permission (11/00768/FULL) was granted for alterations to ground floor office entrance.

- On 7th August 2014 planning permission (14/00420/FULL) was granted for the change of use of part ground floor and part basement from Class B1 (Office) to Class D2 (Gymnasium) and the installation of a new entrance.
- On 24th October 2017 planning permission (17/00911/FULL) was granted for change of use of Room 124 at first floor level from Class B1 use (office) to a flexible use for either Class B1 (office) or Class D1 (medical clinic) use (10sq.m GIA).
- On 21st December 2021 planning permission (21/00595/FULL) was granted for shopfront works comprising: removal of the stall risers, replacement of shopfronts with new shopfront windows and doors, installation of glazed fascias; and other associated and ancillary works.

Proposals

20. Planning permission is sought for the demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of ground plus storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

21. The proposed scheme would provide 101,462sqm (GIA) of floorspace comprising:
    - 85,624sqm (GIA) of office floorspace (Use Class E (g))
    - 125sqm (GIA) of retail/food and beverage/professional services (Use Class E (a/b/c) at ground floor level.
    - 1,849sqm (GIA) of food and beverage/ offices (Use Class E (b/g)), split over level 01 and level 03.
    - 205sqm (GIA) of retail/food and beverage/offices/learning and non-residential institutions/local community (Use Class E (a/b/g)/ F1/F2) at ground floor level.
    - 1,827sqm (GIA) of food and beverage/offices/learning and non-residential institutions/local community (Use Class E (b/g), F1/2) on level 02.
    - 461sqm (GIA) of multi-function space (Use Class Sui Generis), split over ground floor and level 01.
    - 8sqm (GIA) of public lavatory (Use Class Sui Generis) at ground floor level.
    - 11,363sqm (GIA) of ancillary basements

22. The maximum height of the proposed building is 190.65m AOD, comprising 45 storeys above ground, including three levels of plant above the office accommodation.

23. The building would incorporate six basement levels which would house cycle parking and associated end of trip facilities, plant and UKPN, bin store, the Roman Wall and ancillary accommodation. Sections of the existing B1 level would be retained.

24. Grade A office space is the predominant use within the proposed building, with office floorspace being provided from Level 4 upwards. Levels 6 to 26 are the larger floorplates, and these could accommodate one or mix of occupiers on each floor. The floorplates from levels 27 to 41 would be smaller than the lower levels, this is due to the cut back in the design of the building. Amenity terraces for the office occupiers are proposed at levels 27 and 28, with smaller 'Bastion' styles terraces on level 4.

25. Across the ground floor, level 1 and level 2, floor space would be provided for a cultural partner. In addition, part of the retail floor space at ground floor level would be operated by a Social Enterprise food and beverage offer and further space would be provided on level 1 or level 3 depending on specific needs of the Social Enterprise provider.

26. The proposed development is a 45-storey tower, massing composed of two main elements: a base podium rising to a shoulder height at level 27; and above this, an elegant tapering tower, which leans away to the west, and folds into backdrop of taller towers which form the City Cluster.

27. Within the site boundary, along the southern elevation, the proposals include extensive new landscaping, including several planted seating areas, and at its centre, the redesigned Churchyard of St Augustine Papey, and a newly revealed section of the Roman Wall. The edges of these spaces would be densely planted, incorporating several large specimen trees, and a variety of seating options. Connected above this, and wrapping around to the west, are a set of planted walkways and balconies, which taken together, would be named Camomile Park. A feature lift and staircase would enable access to these higher-level spaces. A public toilet is also proposed at street level. All spaces would be directly and freely accessible from the street, making them an extension of the public realm. There would also be extensive planting along the western elevation. To the north, the loading bay and disabled parking spaces area would become part of the public realm and be animated in non-servicing hours.

Consultations

Statement of Community Involvement

28. The Applicants have submitted a Statement of Community Involvement prepared by Kanda Consulting dated January 2025, outlining their engagement with stakeholders. This involved working in conjunction with Things Made Public who had been developing a Cultural & Social Value Strategy based upon local engagement, schools and cultural engagement and co-design workshops to help shape the public benefits.

First Phase of Engagement

29. The Applicants first phase of engagement, which took place between 22nd May to 13th June 2024, included:

- A designed newsletter disturbed to 1,520 addresses on the 16th May 2024
- Five meetings with key local stakeholders
- Two in person drop-in sessions attended by 14 people
- A dedicated consultation website which was visited 1,843 times by 1,196 different users during the engagement phase.
- A geo-targeted social media campaign which secured a reach of 15,794 people, generating 81,878 impressions and 640 clicks through to the dedicated project website.

Second Phase of Engagement

30. The Applicants second phase of engagement, which took place between 10th September to 4th October 2024, included:

- Three stakeholder briefings
- A designed newsletter distributed to 1,520 addressed on 11th September 2024.
- Two in person drop-in sessions attended by 17 people.
- A dedicated consultation website which was updated with the detailed proposals which was visited 1,195 times by 952 different users during the consultation process.
- A targeted social media campaign which secured a reach of 59,408 people generating 14,381 impressions and 374 clicks through to the dedicated website.

31. The dedicated consultation website which went live on the 22nd May 2024 is still live, having been updated throughout each phase of engagement. In addition, throughout the consultation process, a telephone number and email address were supplied and managed by Kanda proving further information to businesses, and stakeholders on request.

Statutory Consultation

32. Following receipt of the application by the Local Planning Authority in February 2025, it has been advertised on site and in the press. Nearby

residential occupiers were also notified directly by letter. The application has been consulted upon twice as follows:

- On the validation of the application in March 2025 for a period of 30 days.
- Under Regulation 25 of the 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, for a 30-day period starting on 9th May 2025. This consultation covered further information in respect of the Environmental Statement.

33. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses are set out below.

Consultation responses	
Hackney Council	No objection. Officer response: Noted.
Active Travel England	Confirmed that they will not provide comments on the application as TfL will provide comments as part of the GLA Stage 1 response. Officer response: Noted.
Gatwick Airport	No objection. Officer response: Noted.
City Airport	No objection subject to the imposition of a condition in relation permanent obstacle lighting scheme. Officer response: The recommended condition has been included in the condition schedule.
Environmental Health	No objection subject to the imposition of conditions. Officer response: The recommended conditions have been included in the condition schedule.
Heathrow Airport	No objection raised in the initial consultation or the re-consultation. Officer response: Noted.
NATS Safeguarding	No objection. Officer response: Noted.

Haringey Council	No objection. Officer response: Noted.
Local Lead Flood Authority	No objection subject to the imposition of conditions in respect of detailed SuDS design and a lifetime maintenance plans for the SuDS. Officer response: The recommended conditions have been included in the condition schedule.
The Royal Borough of Kensington and Chelsea	No objection. Officer response: Noted.
Southwark Council	No comments. Officer response: Noted.
Historic England – GLAAS	Letter dated 08 April 2025 <u>Assessment of Significance and Impact</u> GLAAS advises the City of London on their non designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter. The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable. Significance The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings – this is explained further in the Development Advice letter.

	At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street. Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period. An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset – the burial ground – into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

	The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'. Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset. Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well preserved Roman deposits were encountered. This is a significant omission. Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it. Impact Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains. The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully

	compensated for by the proposed new park design for the area. The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new development. The Scoping response also requested that the results of the proposed predetermination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided. The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works. The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. Conclusions and Recommendations: The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed. We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information

	should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision. Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal. Officer response: These matters are addressed in the Archaeology and heritage sections of this report. Email dated 16 May Confirmed that the additional information submitted does not affect the comments set out above. Officer response: This is noted as the additional information that triggered the re-consultation was not in respect of archaeology.
Greenwich Council	No observations to make. Officer response: Noted.
Lambeth Council	No objections. Officer response: Noted.
Environment Agency	No objections. Informatives are suggested. Officer response: The recommended informatives have been included in the Informatives schedule.
The Council for British Archaeology	Email dated 16 April 2025

	We do not wish to make detailed comments on existing proposals at this stage but would like to express our serious concerns over the applicant's failure to follow the clear advice offered by GLAAS at a pre-application stage. The application site is highly archaeologically significant, with remains from the Roman period and a medieval and post-medieval burial ground. Archaeological evidence about the city's past is a finite resource of high evidential value, and this site is extremely rare in that there are no records of modern development which would have disturbed the surviving archaeological remains. The proposed new development on this site would cause permanent and substantial harm to this archaeology. This harm cannot be justified by an archaeological mitigation strategy (under para. 218 of the NPPF). The application does not demonstrate an adequate understanding of the significance or nature of the archaeological remains on the site, as required by para. 207. The probable presence of undisturbed Roman archaeology is not acknowledged and insufficient assessment work has been done to enable an understanding of the site and the survival of archaeological remains, against the previous advice offered by GLAAS. The CBA do not consider that this application meets the requirements of para 207 of the NPPF or Policy HE2 of the City Plan 2040. Unless a detailed archaeological evaluation is undertaken and a detailed scheme of mitigation works is agreed with GLAAS, we recommend that this application be refused due to insufficient information and the substantial harm which would be caused to the unique archaeology of the site. Email dated 10th June 2025 While the applicants have provided additional information on the above-ground impacts on the setting of nearby heritage assets, no archaeological assessment of the site has been undertaken, as previously recommended by the CBA and GLAAS. As such, we maintain our previous objection to the scheme. If an archaeological evaluation of the site

	which permits an understanding of the probable surviving archaeology on site is not provided, we recommend that this application be refused. Officer response: These matters are addressed in the Archaeology and Heritage sections of this report.
Historic Royal Palaces	Letter dated 22 April 2025 We write in relation to the current consultation on the above referenced planning application, to express HRP's concerns about aspects of the scheme, which relates to the redevelopment of the site at 63A St Mary Axe, based on its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS). Tower of London (ToL) World Heritage Site (WHS). HRP has previously been invited to view proposals for the site while these were in development, in March and July 2023. In response to the scheme presented in July 2023, which had been amended since March, HRP advised that it welcomed the reduction in height of 3 storeys and some enhancement in the lean away from the White Tower that had been achieved. However, it emphasised it wished to see a greater degree of leaning to the eastern apex of 100 Leadenhall Street to enhance the sky space between the White Tower and better define the eastern edge of the City Cluster, and to preserve the LVMF view 10A.1 which is the key view that has most impact on the OUV of the World Heritage Site in terms of this proposed development. HRP also highlighted that, although the proposals sat within the draft city cluster profiles at that time, HRP was not in agreement with the tall vertical edge of that profile on the eastern edge and indicated it would be advocating for a more angled profile during the formal consultation (which it has since done so). With regard to the submitted proposals (ref 25/00223/FULEIA), HRP wishes to reiterate its concerns about the profile and massing of the proposed tower element of the development, and its impact on the silhouette of the White Tower in LVMF view 10A.1. Whilst the slant achieved since

	the earlier iterations of the design are acknowledged, HRP maintains that the impacts on the OUV of the Tower of London could(should) be further mitigated with a steeper lean and a further reduced height. HRP would also highlight that there remains a lack of consensus over the appropriate outline for the City Cluster, including at the eastern edge. Although the design appears to continue to sit within the proposed cluster profile, HRP does not agree that this provides sufficient protection to the Tower of London and LVMF view 10A.1. It therefore requests that the profile is modified as suggested above to mitigate the impact on the silhouette of the White Tower and thereby help to preserve the OUV of the Tower of London. HRP is also concerned that the lower-level shoulder of the proposals might be more apparent in winter, without the benefit of tree cover, and requests that winter versions of View 10A.1 are provided so that this risk can be reviewed. Officer response: The matters raised HRP are addressed in the Heritage and Strategic Views sections of this report.
Historic England	Letter dated 16 April 2025 These proposals would harm attributes of the Tower of London World Heritage Site's Outstanding Universal Value and consequently harm its integrity. This weighs very heavily against the application. The proposal includes revealing and conserving the London Wall scheduled monument. This would represent an enhancement of its significance and the ability to appreciate it. However, we are concerned that removing the associated, non-designated burial ground (which forms part of the London Wall's setting that is likely to contribute highly to its significance) may cause a level of harm that would not be outweighed by the heritage benefit of showcasing the wall, nor would it be capable of outweighing the harm to the World Heritage Site.

	The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich. The Greater London Archaeological Advisory Service (GLAAS) has advised that further information is required to fully assess the nature of the harm which may be caused by the development. Our advice does not preclude the redevelopment of the site, but these considerable heritage impacts together indicate that the proposals represent neither sustainable development as required by national planning policy, nor the optimum capacity for the site, as required by the London Plan's design-led approach. It would be possible to redevelop the site without causing the harm we have described and we encourage that this should instead be pursued. We recommend that planning permission for the current proposals should therefore not be granted. <u>Impact of proposals</u> a) <u>Tower of London</u> Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed detailed design. The additional height that would be introduced at its eastern edge, would result in an upward step in scale directly beside the White Tower, creating a greater cliff edge than the current situation. The further encroachment of this development into the sky space around the Tower would present a greater distraction in views of its silhouette. The White Tower's silhouette is recorded in the 2016 WHS Management Plan as a key component of the World Heritage Site's attributes of OUV as an internationally famous monument, in a landmark siting, and reflecting the physical dominance of the White Tower. The latter reflects the Tower as a symbol of Norman power - an appreciation of this is similarly reliant on the clear sky backdrop.

	The proposed building would appear different to the character of the existing cluster because of the unusual form that results from its eastern edge being twisted to face south, the staggered terraces and the contrast of materials on that eastern edge. It would therefore be more eye-catching than the existing Cluster buildings, which would compound the impact described above. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above. The experience from Tower Bridge, as an example of the views of the Tower where this harm would be appreciated, is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it. The proposals would leave less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City. The important sky space around its silhouette, which is essential to sustaining the attributes and values of the Tower discussed above, would be further compromised when compared to the existing situation. This would add to the cumulative harm to the attributes of OUV described above. In its Technical Review report on the refused schemes at 31 Bury Street, regarding the LVMF view 10A.1, ICOMOS advised that "when that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. Whilst that comment concerned a different scheme - proposals at 63 St Mary Axe would be shorter - it is notable that the silhouette of the White Tower and its visual separation from the City would be impacted in a similar way. b) <u>The London Wall scheduled monument</u>

	The current proposals have been developed to include an area from which the London Wall can be readily viewed by the public. We currently do not know what the condition of the wall is; however, there will likely be a need for a programme of conservation and/or consolidation. There will also likely be further design considerations that would need to respond to the condition of the wall when revealed. Specifically, there will be a need for closer analysis of the likely environmental conditions of the proposed space and if they would be appropriate for preserving the wall. There is a small potential for harm to the fabric of the wall which could result from exposing it to the wider environment. However, it is likely that this harm could be adequately limited through appropriate conservation works, suitable environmental controls, and commitment to a programme of ongoing management. Therefore, we think that the proposals for revealing the wall within the design would enhance the significance of the monument through increasing its legibility and accessibility. However, we also consider that there would be harm to the scheduled monument caused by the complete removal of the non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. Removal of the burial ground will likely destroy archaeological remains which have a direct historical association with the London Wall and which contribute to an understanding and appreciation of the scheduled monument. The extent of this harm cannot be fully defined as no archaeological evaluation has been undertaken to confirm the level of retention of archaeological remains within the burial ground and to characterise any remains. It should also be noted that no assessment of impacts on the London Wall scheduled monument (both adverse and beneficial) has been presented as part of the Environmental Statement or Archaeological Desk Based Assessment.

	c) <u>The medieval and post-medieval burial ground</u> As previously stated, the archaeological advisor for the City of London is the primary contact for advice in relation to the burial ground as a non-designated heritage asset. However, we note here her position that the development proposal as submitted would result in the total loss of this non-designated heritage asset and that the impact of development on the burial ground has not been properly assessed in the Environmental Statement due to a lack of archaeological evaluation. <u>Historic England's Position</u> The proposals would cause harm to attributes of OUV of the World Heritage Site, the significance of the scheduled monument and result in the total loss of the non-designated burial ground. Overall, we do not consider that the proposals have been developed in a way that sufficiently accords with the requirements of national and regional planning policy, which stipulate that heritage significance must inform the form of development proposals early on in the process. Our advice does not preclude the redevelopment of the site. Harm could be greatly reduced, or potentially avoided, in each case with a lower building, which would avoid all three elements of heritage harm (to attributes of OUV of the WHS, the significance of the monument and the total loss of significance of the burial ground) while still achieving a considerable uplift in office space, thereby delivering sustainable development. Such a scheme would accord with the design-led approach required by the London Plan, responding to all elements of the site's highly significant heritage context and its capacity for growth. a) <u>The Tower of London World Heritage Site</u> Whilst the proposals were reduced in scale in response to our pre-application advice, we do not consider that this has adequately reduced the harmful impact. These proposals would continue

	to have a comparable impact to the 31 Bury Street proposals. That application (ref. 24/00021/FULEIA) was recently refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. In this case, we consider that the same attributes of OUV (as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance) and the integrity of the WHS would be harmed. We therefore recommend that the current application should be refused for the same reason. The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the WHS. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them. For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals. For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals. The submitted heritage impact assessment features many inconsistencies with the methodology required by UNESCO, the adopted SOUV and previous commentaries from ICOMOS as an advisory body to the World Heritage Committee. It has scoped out attributes of OUV

	where setting makes an important contribution (attributes that were identified in the Tulip decision, set out above). Furthermore, it has not assessed the kinetic impact, instead treating the viewpoint as static, and presents a limited assessment of the cumulative impact of the proposals. ICOMOS has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (31 Bury Street Technical Review, 20/00848/FULEIA; 24/00021/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA). The World Heritage Centre subsequently requested that the UK State Party submit a State of Conservation Report for the WHS, indicating UNESCO's serious concerns. The application submission does not therefore adequately assess the impact on attributes of OUV, which is required by Para 200 of the NPPF and Policy HC2 of the London Plan. b) <u>London Wall scheduled monument</u> In relation to the London Wall scheduled monument, we acknowledge that there is a more complex exercise to be had in weighing the level of harm caused by complete removal of the non-designated, but associated, medieval burial ground and the enhancements proposed through exposing the wall, providing interpretation, and expressing it further through elements of the design. This weighing exercise is further complicated by the lack of archaeological evaluation, and therefore the lack of key details regarding the condition and nature of the archaeological resource here. The Environmental Statement has not assessed impacts (adverse or beneficial) to the scheduled monument. However, we think that removing the associated, non-designated burial ground (which forms part of the London Wall's setting) would cause a level of harm to the scheduled monument which would not be

	outweighed by the heritage benefit of showcasing the wall. Recommendation Historic England objects to the application on heritage grounds. We recommend that it should be refused or withdrawn. We note that the advice provided to you by the Greater London Archaeological Advisory Service recommends that further assessment of the impact of development on the burial ground be provided. As the burial site is intricately linked to the London Wall, we agree that further information and an assessment of the impacts on the scheduled monument should be required through a Regulation 25 request. Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received. Email 29th May 2025 A revised Heritage Impact Assessment and a video of the 3D model of the proposed development illustrating the kinetic experience of Tower Bridge have been submitted. We continue to refer you to advice letter of 16 April 2025 – the additional information does not overcome the concerns that we have previously set out. The video in particular illustrates the harmful impact of the proposals on the Outstanding Universal Value of the Tower of London World Heritage Site that we have described.

	Officer response: The matters in the Historic England objections are addressed in the Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of this report.
Natural England	No objection. Officer response: Noted.
London Borough of Richmond Upon Thames	No objection. Officer response: Noted.
Surveyor to the Fabric of St Paul's Cathedral	No comments to make. Officer response: Noted.
Cleansing services	No objection. Officer response: Noted.
GLA	Stage 1 Strategic Issues Summary **Land Use Principles**: The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations. **Urban Design and Heritage:** The proposed building is of high architectural quality and will deliver new public realm, however the final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.

	Transport: Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics. **Environment and sustainable infrastructure:** Further information is required for the energy strategy, whole life cycle carbon, circular economy, green infrastructure, water and air quality. Officer response: The above points are addressed din the Proposed Uses, Architecture Urban Design and Public Realm, Heritage, Highways and Trasport, Sustainability and air quality sections of the report.
Network Rail	In reviewing the application, it is important to highlight the forecast additional growth in rail demand at Liverpool Street Station, considered on an individual development basis, can be accommodated by the available and planned on-train capacity. However, NR remain concerned about the cumulative impact of multiple consented and proposed major developments in the immediate vicinity of LST — particularly in relation to medium-term pedestrian flow and station concourse capacity. At present, there is no committed or funded scheme to address this growing 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 development in the area. NR would therefore encourage the City to continue to consider potential allocation of its Community Infrastructure Levy (CIL) funds in addressing the collective infrastructure challenges created by cumulative growth. Officer response: It is noted that CIL is not ringfenced from a particular site for any infrastructure and as such, no CIL can be secured for Network Rail.

	The City of London addresses cumulative impacts of approved development sites via securing public realm improvements through Section 278 Agreements. These are mainly delivered in the vicinity of the sites, than in areas located further away, such as in this instance the LSS.
TfL Infrastructure Protection	No objection in principle, however there are a number of potential constraints on the redevelopment of a site situated close to London Underground infrastructure and as such a condition is requested to ensure the development does not have an impact on existing London Underground/DLR transport infrastructure. Officer response: The recommended condition has been included in the condition schedule.
City of London Polic – Counter Terrorism Security Advisor (CTSA)	Advice was provided to the applicant which is sensitive in nature, and the relevant conditions are included in the condition schedule.
Hammersmith and Fulham	No objections raised. Officer response: Noted.
The City of London Archaeological Trust (CoLAT)	CoLAT CoLAT is fully in support of the comments and criticisms of Historic England, sent to you in their letters of 8 April and 16 April 2025. We restrict our own comments to those concerning the treatment of the archaeological monuments and strata, not the shape of the future building. We underline the deficiencies in the application pointed out by the HE letter of 8 April: 1. The archaeological evaluation of the medieval churchyard requested by GLAAS at pre-determination stage has not been carried out; 2. The Roman archaeology is not adequately assessed; 3. The Environmental Statement does not demonstrate how the burial ground will be preserved; 4. The requested pre-determination archaeological evaluation has not been undertaken; 5. No WSI has been approved by EH for any post-consent archaeological work.

	We therefore support the HE request that if these various kinds of archaeological information are not provided, you should refuse the application. Officer response: These matters are addressed in the Archaeology and Heritage sections of this report.
Thames Water	<u>Waste Comments:</u> The proposed development is located within 15 metres of a strategic sewer. Thames Water requests a Piling Method Statement condition to be added to any planning permission. As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. 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. <u>Water Comments:</u>

	The proposed development is located within 15m of a strategic water main. Thames Water requests a Piling Method Statement condition to be added to any planning permission. 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 a condition be added to any planning permission requiring appropriate 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. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. <u>Officers Response:</u> Thames Water advice has been taken into consideration and conditions and informatives are imposed to the schedule of conditions.
Tower Hamlets	Letter dated 16 May 2025 The application proposes a development which would provide c85,000sqm Grade A office floorspace. The London Borough of Tower Hamlets (LBTH) acknowledges that this has the potential to make a significant contribution towards the growth in office development, and consequent

	long term economic and employment growth, that is sought in the City of London's Local Plan 2015 and the emerging City Plan 2040. In considering the effect of the proposal on land within LBTH, particular regard has been had to the Townscape and Visual Impact Assessment and Heritage Impact Assessment submitted with the application. In the majority of views the development does not raise significant concerns, as it is either fully or partially obscured by existing buildings, appears at a sufficient distance from the White Tower to avoid a meaningful impact, or is read as part of a wider backdrop of tall buildings. LVMF View 10A.1 does, however, warrant particular attention due to the increased visual proximity of the development to the White Tower and its potential effect on the composition of the view. From this viewpoint, the cluster of tall buildings in the City appears much closer to the White Tower, which is the central feature of the WHS, with only a narrow gap separating them. The LVMF guidance highlights that the appreciation of the Tower of London's detailed architecture and historic layering is enhanced by the surrounding free sky space. The proposed development would be visible in this view, positioned in front of existing tall buildings, including the Salesforce Tower (formerly Heron Tower). Although it would retain the final part of the gap between the cluster and the White Tower, its presence would intensify the visual dominance of built form and contribute to the crowding of the White Tower's immediate setting. The development would also appear taller than the current building at the cluster's edge, reducing the sky space between the cluster and the White Tower and competing visually with the tower's corner turrets. While the building leans away from the White Tower, mitigating some sky space loss, this design also introduces a more striking and potentially distracting form, where a calmer appearance might better respect the WHS setting. Overall, LBTH consider that the proposed development would result in only limited harm to the WHS, taking into account the number and

	variety of views in which they are experienced together. However, in the context of viewing location 10A.1, the proposed development is considered to cause some harm to the setting of the WHS. The decision maker should carefully consider this harm and weight it against the public benefits of the scheme. Officer response: The matters in the Tower Hamlets observations are addressed in the Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of this report.
City of Westminster	Confirmed that they have no comments to make. Officer response: Noted.
Suicide Prevention Officer	Requested further information regarding balustrade design, management and planting. Officer response: A condition has been added to cover these matters in detail.

Letters of Representation

34. Three letters of objections have been received from members of the public. These are set out in the table below.

Representation 1: As residents of the local area, including residing at the Pan Pacific Hotel and Residences, we are particularly concerned about the loss of light, privacy, increased noise levels, and overall disruption that this project may bring to the neighbourhood. Given the scale of the development, we believe it is crucial to assess its implications on both residential and hotel communities in the vicinity. Officer Response: These matters are addressed in the Daylight & Sunlight, Overlooking, Privacy & Overbearing, and Noise & Vibration sections of this report We would appreciate your guidance on the following: 1. Public Consultation Status: Could you confirm whether the application has now been published for public consultation, if so could you provide details on the timeline for submitting comments?

2. Engagement Process: How can we formally communicate our concerns to the planning team? Is there an upcoming meeting, consultation or forum where we can raise these issues?
3. Impact Assessments: Has a thorough daylight/sunlight, noise and environmental impact assessment been conducted? If so, we would appreciate access to these reports to better understand how this development will affect the surrounding area.

Officer Response: It is noted that these comments were received prior to the consultation being sent out on this application; a response was provided to the individual. For the avoidance of doubt, the individual was told the consultation deadlines, how they can respond to the consultation and that all of the assessments are on Public Access for review.

Representation 2:

We currently enjoy comfortable living conditions at 80 Houndsditch with privacy and plenty of light available. The plans proposed will destroy this as will be overlooked by the new building which is proposed to have a roof terrace on levels 27 to 29, which corresponds with approximately 31-34 of the Pan Pacific.

The new building will be uncomfortably close to our living space windows, and furthermore, the roof terraces will also provide views into the apartment.

The proximity of the proposed building will make our apartment feel hemmed in on three sides destroying our views which are aesthetically pleasing. The new building will create an uncomfortable sense of enclosure.

Officer Response: These matters are addressed in the Daylight & Sunlight and Overlooking, Privacy & Overbearing sections of this report

Eversheds Sutherlands on behalf of The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London.

Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the Site:

(a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;
(b) 33 Great St Helens;
(c) 52-68 and 88 Bishopsgate;
(d) 12/20 Camomile Street;
(e) 25-51 (odd), 61 St Mary Axe; and
(f) 7-11 Wrestlers Court

We have undertaken an initial review of the above planning application and we have substantive concerns as to the potentially adverse effect the

Proposed Development could have on the levels of available light to our client's properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.

Daylight and Sunlight Impacts

Trium Environmental Consulting LLP prepared the Environmental Statement ('ES') pursuant to the planning application. Chapter 8, Daylight, Sunlight and Overshadowing, Light Trespass and Solar Glare of the ES submitted with the application purports to assess the key impacts associated with the Proposed Development once completed in relation to:

• Changes to the quantity of daylight and sunlight experienced by sensitive receptors in the proximity to the Site;
• Changes to the amount of overshadowing at amenity areas surrounding the Site;
• The potential for light trespass from the proposed commercial uses at surrounding sensitive receptors; and
• The potential for solar glare to surrounding road viewpoints.

It is noted in this Chapter that the existing baseline for the assessment was determined by undertaking a review of the Site and surrounding land uses, achieved via data sources from the Council and Google Maps. In paragraph 8.2, the buildings which were identified as sensitive receptors, were selected based on the criteria, identified in the BRE Guidance, where, " if the angle to the horizontal subtended by a new development, at the level of the centre of the lowest window of a neighbouring property is less than 25°, then it is unlikely to be affected by the Proposed Development. Therefore, those sensitive receptors which intersect with the 25° angle planes have been assessed in the baseline condition". Although the Applicant has made reference to the BRE Guidance, we would query whether this is sufficient in the context of the Proposed Development and the nature of the sensitive receptors in close proximity to the Site.

Three scenarios are assessed and reported on in Chapter 8, the Existing Baseline Scenario, the Proposed Development Scenario and the Cumulative Scenario. However, solar glare and light trespass were omitted from consideration of the baseline scenario on the basis that "The light trespass analysis and solar glare analysis are not comparative assessments, i.e. the occurrence of light trespass in the baseline condition would not justify the occurrence of light trespass from the Proposed Development. The current and evolved baseline are, therefore, not relevant with respect to the light trespass". Solar glare and light trespass assessments were also not considered in the Proposed Development Scenario and the Cumulative Scenario.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") (Schedule 4) requires a description of the current state of the current environment being the Existing Baseline and the identification of significance effects as a result of a new development:

A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. (Regulation 18(3), Schedule 4, Section 3, the EIA Regulations)

While Chapter 8 provides an assessment of the baseline conditions, it is surprising that the buildings in surrounding areas, namely Camomile Street, are not considered in more detail. Room layouts were considered to assess No Sky Line (NSL) criteria, however only two properties were selected, 80 Houndsditch and 16 New Street – Tapestry Building (Paragraph 8.53). This is a significant limitation, given the impact of the Proposed Development on the daylight distribution and potential reduction of that daylight distribution on existing buildings, and there is no justification for acquiring data from these properties only.

In paragraph 8.60 the methodology for defining effects, receptors and receptor sensitivity for daylight and sunlight is discussed. It is noted that "existing surrounding residential properties (i.e. receptors) are considered highly sensitive to daylight and sunlight levels, specifically habitable rooms" and accordingly, all existing residential receptors assessed within the ES are considered highly sensitive, but commercial buildings have "not been assessed as they are not typically considered to have a reasonable expectation of daylight" this is despite the BRE Guidelines (2022) advising that the guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight.

In paragraph 8.88 it is acknowledged that the baseline considers the existing daylight and sunlight conditions at neighbouring residential properties, with the potential to be affected by the Proposed Development, however, again, a full definitive list of properties is not provided. It is also acknowledged that sensitive receptors that are in close proximity to the Site, but their views are "obstructed or otherwise shielded" and are therefore excluded from the assessment, examples are given, Bevis Marks Synagogue, but again a full list of excluded properties is not provided.

<u>Baseline, Daylight and Sunlight Results</u>

The results assessing Vertical Sky Component (VSC) show that out of 787 windows assessed, only 175 (22.2%) would meet BRE's criteria in the Baseline condition. For No Sky Line (NSL), of the 216 rooms assessed, only 130 (60.2%) would meet BRE's criteria in the Baseline condition. For

sunlight of the 634 windows assessed, 310 (48.2%) windows assessed would meet BRE's criteria in the Baseline condition.

The Map at Figure 8.1, showing Daylight, Sunlight and Light Trespass Receptors in the areas surrounding the Site, is not in high definition so it is not possible to see exactly where the sensitive receptors are located. Table 8.5 however, does show that addresses in which our client owns properties, including Bishopsgate and St Marys Axe, which is listed as having a High Sensitivity to Daylight and Sunlight, Overshadowing, Light Trespass and Solar Glare, yet limited analysis appears to have been undertaken (or made available) in respect of the specific properties in these areas. It is therefore not entirely clear what specific baseline information has been compiled and assessed in respect of our client's properties, and thus how this is then affected by the Proposed Development.

Completed Development

Only 6 properties (identified as sensitive receptors) have been assessed for daylight, and out of the 787 total windows in these receptors assessed for VSC, only 393 (49.9%) would meet the BRE criteria.

In assessing the future environment, the Chapter concludes at 8.214 that out of the 6 properties assessed, 3 would experience an overall negligible effect, one minor adverse and one property would experience a major adverse significant effect. For sunlight, the same 6 properties were assessed. We would like to reiterate that this limited sample (6 properties) is small and may not provide a sufficiently accurate representation of the full impact of the Proposed Development. Moreover, we are not able to appreciate the specific impacts of the Proposed development on our client's properties.

We have yet to conclude our detailed impact assessment of other aspects of the Proposed Development and reserve our position in relation to these issues. We do, however, have serious concerns that our client's properties could experience a significant adverse impact as a result of the construction of another tall building in this area. The Environmental Statement simply does not provide sufficient detail, to enable our client to confirm and appreciate whether the impact of the Proposed Development on their properties in the surrounding area have been fully scrutinised and assessed.

For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.

Officer Response:

It is highlighted that some of the properties listed in objection are offices and commercial properties. The assessment and impact on properties of this nature are set out in the Daylight and Sunlight section of this report.

The objection has made series of comments in respect of the scope of the assessment in terms of the EIA and the properties assessed. It is highlighted that BRE undertook a third-party review of the Chapter 8 of the Environmental Statement, who confirmed they are generally satisfied with the assessment methodology and concluded that the overall scope of the review was reasonable.

The objection has made comments in relation to the Solar Glare and Light Spill assessment only be undertaken in the proposed development scenario. It is noted that as set out in the relevant sections of the report, these assessments are not comparative and as such, it is acceptable they have only been undertaken in the proposed development scenario. It is also noted that a lighting strategy would be secured by condition to ensure that the impact of lighting from the development has an acceptable impact.

Since the receipt of the objection, the applicant has provided a response, prepared by their Daylight and Sunlight Consultants. The response is included in full in the background papers.

Daylight and Sunlight matters are considered in full in the Daylight and Sunlight section of this report.

Policy Context

35. 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. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, was submitted to the secretary of state on 29th August 2024. The City Plan 2040 is now subject to an independent examination to be conducted by the Planning Inspectorate. This is a continuous process running from the date of submission through to receipt of the appointed Planning Inspectors' final report, with the Examination in Public beginning on 25th March and concluding on 19th June 2025.

36. Emerging policies are 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.

37. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2025 and the Planning Practice Guidance (PPG), which was last updated in February 2025.

The NPPF

38. 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.

39. Chapter 2 of the NPPF focuses upon achieving sustainable development. Paragraph 8 states that achieving sustainable development has three overarching objectives, being economic, social and environmental. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11 sets out that presumption.

40. Chapter 4 of the NPPF focuses upon determining applications. 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).

41. 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

42. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places. 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. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

43. 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.

44. 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 be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

45. 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.

46. Chapter 11 of the NPPF seeks to make effective use of the land. Paragraph 124 advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

47. 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.

48. 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 and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

49. 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.

50. 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.

51. Chapter 14 of the NPPF relates to meeting the challenge of climate change flooding and coastal change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. 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.

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

53. 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, amongst other things, 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.

54. 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.

55. 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.

56. Paragraph 212 of the NPPF advises that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

57. 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.

58. Paragraph 215 of the NPPF states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

59. Paragraph 216 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Statutory Duties and Considerations

60. The Corporation, in determining the application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far 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).

61. 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 possessed. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

62. In considering the application before you, account has to be taken of the documents accompanying the application, the environmental information including Environmental Statement, the further information, consultation responses, letter of representations and the statutory and policy framework.

63. There are polices in the Development Plan which support the proposals and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

64. The principal issues in considering this application are:
    a) The economic benefits of the proposal.
    b) The appropriateness of the proposed uses, including the site's cultural offer.
    c) The appropriateness of the site to accommodate a tall building.
    d) The appropriateness of the architecture and urban design of the proposals, and the new public realm.
    e) The impact on Strategic Views in the London Views Management and on other strategic local views.
    f) The impact of the proposals on the Tower of London World Heritage Site.
    g) The impact of the proposals on the setting and significance of heritage assets.
    h) The potential impacts of the development on buried archaeological remains and upon removal of particular archaeological remains.
    i) Whether the scheme is accessible and inclusive.
    j) The ability of the proposed highway and transportation arrangements including servicing, cycle parking provision, and impact on highways.
    k) The acceptability of the scheme in terms of its environmental effects including wind microclimate, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability.
    l) The impact of the proposed development on the amenity of nearby residential occupiers, including noise and vibration, overlooking, daylight and sunlight, solar glare and light pollution.
    m) Acceptability of the proposed security, suicide prevention and fire safety arrangements.

n) The impact of the development on flood risk.
o) The outcome of the Health Impact Assessment
p) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
q) Duties under the Public Sector Equality Act (section 149 of the Equality Act 2010) and the Human Rights Act 1988.
r) The requirement for financial contributions and other planning obligations.

Economic Development and Uses

Economic Issues

65. 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 given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to economic benefits will depend on the nature and extent of those benefits in light of other planning considerations.

66. The City is home to banking, insurance and maritime industries supported by legal, accountancy and other professional services and growing cluster of technology, media and communications (TMT businesses). These office based economic activities have clustered in or near the City to benefit from economies of scale and in recognition that physical proximity to business customers and rivals can provide a competitive advantage. 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 that 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 Enterprises 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 needed 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.

67. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

68. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

69. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long terms 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 orientated 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 used development in the City in order to achieve this aim.

70. 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.

71. 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 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 Londo'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.

72. In terms of the Local Plan 2015, Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m GIA during the period 2011-2026, to provide for an expected

growth in workforce of 55,000. The Local Plan 2015, 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.

73. 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.

74. The application site is located within the Eastern Cluster as defined in the Local Plan 2015. The cluster policy area is defined by an illustrative diagram on the policies map, this area is intended to a general strategic area where tall buildings can be delivered on appropriate sites. In the emerging City Plan 2040, the application site is in the area appropriate for tall buildings as identified in the policies map, Figure 28 and Figure 14, where tall buildings may be appropriate subject to the requirements of Policy 12 and other relevant policies, but it is not located within the Key Area of Change, as defined in Figure 27.

75. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporation's 'Destination City' vision for the square mile.

76. The proposed scheme would deliver on the City's strategic economic objectives and support the City's economic role by providing a superlative and strategic contribution of 85,624sqm (GIA) of flexible office floorspace, alongside a complimentary retail and cultural offer and enhanced public realm. Therefore, the proposed development would support the strategic

objectives of the development plan and the emerging City Plan. The anticipated economic benefits of the proposed development are material and weigh in favour of the proposed development.

Land Uses

77. This section of the report provides an overview in respect of the layout and proposed mix of uses on the site before appraising the acceptability of the uses:

- 85,624sqm (GIA) of office floorspace (Use Class E(g))
- 125sqm (GIA) of flexible retail/food and beverage/ professional services floorspace (Use Class E (a/b/c) at ground floor level on the Outwich Street elevation
- 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g)) at first and third floor.
- 205sqm (GIA) of flexible retail/food and beverage/offices/ learning and non-residential institutions/ local community floorspace (Use Class E(a/b/g), F1/F2) at ground floor level on the Houndsditch elevation.
- 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2) on the second floor.
- 461sqm (GIA) of a multi-function space (Use Class Sui Generis) at ground and first floor levels.
- 8sqm (GIA) externally accessible public lavatory (Use Class Sui Generis) at ground floor level.
- 11,363sqm (GIA) of ancillary basements.

78. A breakdown of the existing and proposed uses (GIA) is set out in the table below:

Land Use	**Existing**	**Proposed**
Office (Use Class E (g))	17,892.3sqm	85,624sqm
Gym (D2)	717.6sqm	0Sqm
Flexible retail/food and beverage/ professional services floorspace (Use Class E (a/b/c)	0sqm	125sqm
Flexible food and beverage and office floorspace (Use Class E (b/g))	0sqm	1,849sqm
Flexible retail/food and beverage/offices/ learning and non-residential institutions/ local community floorspace (Use Class E(a/b/g), F1/F2	0sqm	205sqm

Flexible food and beverage/ offices/ learning and non-residential intuitions/ local community floorspace (Use Class E (b/g), F1/F2)	0sqm	1,827sqm
Multi-function space (Use Class Sui Generis)	0sqm	461sqm
Public Lavatory (Use Class Sui Generis)	0sqm	8sqm
Ancillary Basements	3000sqm	11,363sqm

Provision of Office Accommodation

79. 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 DM1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

80. The predominant use of the proposed development is as office space comprising of 85,624sqm (GIA) of Class E (g), this would be an uplift of 67,731.7sqm of office floorspace on this site. The office space is classified as Grade A office space.

81. Adopted Local Plan policy CS1 seeks a significant increase in new office floorspace in the City. The emerging City Plan 2040, in Policy S4, seeks to deliver a minimum of 1.2 million sqm NIA of new office floorspace, which approximately equates to 1.6 million square metres GIA, in the period between 2021 and 2040.

82. At 31st March 2022, 835,000sqm net increase in office floorspace has been delivered since 2016 and a further 576,000sqm net was under construction or was permitted in the City. 360,000sqm of flexible office floorspace was approved in 2021.

83. The Offices Topic Paper as part of the evidence base for the emerging City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The proposed development sits within the City Cluster category which is modelled at being able to achieve an office floorspace uplift of 630,000sqm-770,000sqm. The proposed development would deliver a significant amount of floorspace target, providing an uplift of 67,731.7sqm

(GIA), which accounts for 4.23% of the total office floorspace (1.6 million sqm GIA) to be delivered by 2040 as required by the emerging City Plan 2040.

84. 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 option which offer a range or interior environment amenity, floor area and choice of outlook. This would accord with emerging City Plan 2040 policy S4 which encourages new floorspace to be designed to be flexible and allow adaption of space for different types and sizes of occupiers.

85. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and policy S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan 2015 and the emerging City Plan 2040. The proposed development would result in a substantial uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international and financial professional services centre.

Loss of Gym

86. In the basement of the existing building there is a gym, 717.6sqm (GIA) in size; members of the public pay a membership to use the gym. Policy DM19.3 of the Local Plan 2015 states that proposals involving the loss of public sport and recreation facilities will be resisted unless:

- replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that 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 sport and recreation facilities which could be met on the site.

87. Any such loss must be accompanied by evidence of a lack of need for the facilities and that the loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed at reasonable terms for sport and recreational use. Paragraph 3.19.18 of the supporting text of this policy states that there are numerous private gyms and sport clubs in the City which mostly serve the needs of daytime working population, whilst these facilities are important in meeting sport and recreational needs it will not always be necessary to prevent their change of use, due to the fluid nature of the private market. Policy HL7 of the emerging City Plan 2040 states that existing public sport and recreational facilities will be protected. The supporting text of this policy states '*there has been an*

increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities, including those within office developments and some hotels. While this is welcome, many facilities charge substantial fees and are not available to those seeking more informal, occasional and cheaper sport and leisure opportunities' and *'however, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities'.* The emerging City Plan 2040 makes a distinction between public and private gym facilities.

88. It is noted that on the 1st September 2020 changes were made to the Use Classes Order 1987 (as amended) where the former use classes of shops, financial and professional services, restaurants and cafes, non-residential use institutions, and assembly and leisure uses merged into one use class (Use Class E), which allows changes between Class uses at any time without the need for planning permission, unless there is an existing planning restriction for a particular site.

89. As set out above, the proposals would result in the loss of the gym at basement level. Since the introduction of Use Class E as mentioned above, unless a restriction applies (i.e. a condition attached to a previous permission for example) for a continuous use of the former commercial uses, planning would not be required for their loss given the now interchangeable nature of the new Use Class E. In this instance, no restrictions have been placed on the basement gym under the planning application that approved it (14/00420/FULL).

90. The existing gym is private and operates as a spinning studio and as such no loss of public sport or recreational facilities results from the proposed development. There are numerous local private provisions of similar facilities (spinning studios and other gym facilities) within the vicinity of the application site and the ability to change the use away from a private gym under the Use Class Order is a material consideration. It is therefore considered that the loss of the private gym is acceptable and as a matter of planning judgement policy DM19.3 of the Local Plan and policy HL7 of the emerging City Plan 2040 are complied with.

Flexible Uses

A series of flexible uses are proposed across the ground to third floors, these are set out below:

- 125sqm (GIA) of flexible retail/food and beverage/ professional services floorspace (Use Class E (a/b/c) at ground floor level on the Outwich Street elevation
- 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g)) at first and third floor.

- 205sqm (GIA) of flexible retail/food and beverage/offices/ learning and non-residential institutions/ local community floorspace (Use Class E(a/b/g), F1/F2) at ground floor level on the Houndsditch elevation.
- 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2) on the second floor.

91. The assessment below assesses the suitability of each use within the flexible uses proposed.

92. As set out in the office provision section of this report, the provision of office floorspace is supported. It is noted that due to the flexible nature of the Use Class being applied for, the office floor space is not accounted for in the office floor space figures for this site.

93. Across the range of flexible uses being applied for, there could be up to 330sqm of retail floor space at ground floor level. This would be on either the prominent Outwich Street elevation and/or on the Houndsditch elevation. The site is not situated within Principal Shopping Centre or along a Retail Link as defined by Local Plan 2015 and emerging City Plan 2040. The provision of the active retail offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that “The City Corporation will seek to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City”. The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City’s growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.

94. Each of the flexible use classes applied for incorporate food and beverage use (Use Class E(b)) and if all these areas operated in a food and beverage use this would equate to 4,006sqm. The site is not situated within Principal Shopping Centre or along a Retail Link as defined by Local Plan 2015 and emerging City Plan 2040. The provision of the active food and beverage offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that “The City Corporation will seek to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City”. As the application site is located within the CAZ area, where the provision of flexible floorspace is supported given that it serves the CAZ function, it is considered that the proposal would be compliant with the development plan.

95. Learning and non-residential institutions and local community floor spaces (Use Class F1/F2) are also proposed in the flexible use classes, and these are proposed on levels on the ground floor on the Houndsditch elevation or

on the second floor. Local Plan policies CS22 and DM22.1 support the provision of community services. It is advised that 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 us;*
- *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 scale, character, location and the impact of the proposal on existing facilities and neighbouring uses."*

96. Policy HL5 of the emerging City Plan 2040, expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered to make a significant contribution to people's mental, spiritual and physical well-being, sense of community, learning and education. As such the proposed F1 and F2 uses within the flexible use classes are supported.

97. The proposed flexible uses including the mix of uses would provide a complimentary use to the offices within the proposed building on site in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with emerging City Plan policy OF1.

Lack of proposed Elevated Public Space

98. Local Plan 2015 policy DM10.3 and emerging City Plan 2040 polices S8, S12 and DE4 seek the delivery of high quality, publicly accessible elevated viewing spaces at upper levels. Public access to tall buildings within the City is important in creating an inclusive City.

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

100. No elevated public space is proposed on the upper levels of the proposed building. Officers note that, of the aforementioned policies, DM10.3 of the Local Plan, S8 (17) of the emerging City Plan 2040 and D9 (D) of the London Plan encourage that such spaces should be provided where appropriate, not that they must be provided, while emerging City Plan 2040 are more directive, requiring tall buildings to provide such spaces.

101. Officers consider that such a space would not be appropriate in this location given its proximity to residential properties, and due to the proposed cultural offer (set out below in this report) which are significant public benefits in and

of themselves, and due to the provision of the publicly-accessible walkways on the lower levels.

102. As such, the public benefits associated with the proposals and other justification sufficiently outweighs the lack of public viewing gallery on the upper level of the proposed development. However, this would result in non-compliance with emerging policies S12 (h) and DE4 (3) of the City Plan 2040. It is noted that these policies have limited weight as the plan is going through Examination in Public.

Public Toilet(s)

103. Policy S6 Public toilets of the London Plan states that large scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of free publicly accessible toilets for a range of users and free 'changing places toilets designed in accordance with the guidance in the British Standard. Policy HL6 'Public toilets' of the emerging City Plan 2040 also requires the provision of a range of directly accessible public toilets for a range of users and for the provision for free 'changing places' facilities.

104. An externally accessible toilet (8sqm is in size and Use Class Sui Generis) is proposed to be accessed within the relandscaped former Churchyard of St Augustine Papey, which is on the southern elevation of the building accessed via Camomile Street. The accessible toilet would be open between the hours of 06:00 – 22:00 and would be free of charge. A condition will be imposed ensuring that the toilets would be made available to the public during 06:00 and 22:00 hours, free of charge.

105. At basement level 1, a changing places toilet is proposed. This would be accessed via two accessible lifts at ground level and would be accessible to member of the public between the hours of 06:00 to 22:00 The full details of the 'changing places' toilet would be secured by condition to ensure that it complies with the British Standard and a condition is also imposed in respect of the hours it is made available to the public and that it is free of charge.

106. Details of the maintenance and management of the above-mentioned facilities would be secured via a planning obligation within the S106 agreement.

107. Subject to the imposition of conditions of conditions and S106 obligations, the provision of the external publicly accessible toilet and the changing places facilities at basement level would comply with policy S6 of the London Plan and policy HL6 of the emerging City Plan 2040.

Cultural Offer and Strategy

108. Policy CS11 of the Local Plan 2015 seeks to maintain and enhance the City's contribution to the 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 there is 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.

109. Local Plan policies CS22 and DM22.1 support the provision of community services. It is advised that 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 us;*
- *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 scale, character, location and the impact of the proposal on existing facilities and neighbouring uses."*

110. The emerging City Plan 2040 under policy CV2 seeks opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and weekend and attract significant numbers of visitors into the City. Policy HL5 of the emerging City Plan 2040, expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered to make a significant contribution to people's mental, spiritual and physical well-being, sense of community, learning and education.

111. The cultural offer for the proposed site is set out in the submitted Culture & Social Value Strategy for the site which has been prepared by Things Made Public (January 2025). The strategy presented in this document was informed by the following engagement:
- Desk based research
- Creative consultation with communities and user groups through interviews, workshops and events to understand key cultural and social value priorities.
- Detailed engagement with user groups, potential partners and design teams to defied propositions and integrate directly into the project design

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

- Embrace differences: Design with diversity in mind, creating a friendly face to the City, appealing to the many, not the few.
- Bringing people together: Champion exploration and engagement that draws people, into across and around the building.
- Working within our places: Create meaningful connections and collaborations with surrounding partners.
- Incubate to generate: Encourage the growth and development of social entrepreneurs, cultural talent, inviting new audiences to experience the City of London.

113. The Strategy sets out that the above, informed the cultural and social value offer.

Cultural Offer

114. A flexible, fully accessible multi-function space is proposed over ground and first floor level; providing 461sqm of floor space. This space would be operated by a cultural partner, whilst the content of the programming of this space would be dependent on the cultural partner, the multi-function space has the ability to host art, music, theatre and dance performances, creative residencies, participatory workshops, open rehearsals and festivals. This space would have the ability to open up to the newly created Camomile Park to the south and the ability to accommodate tiered auditorium style seating.

115. In addition, the floorspace provided over the ground floor and level 1, at level 2 a minimum 189sqm of floor space would be provided. This floorspace would provide space for rehearsals, workshops or production space. It is noted that the exact location on the second floor has not been identified this is because it would depend on the needs of the cultural partner. Due to the Use Class applied for the second floor, there is the potential for further space to be provided if required by the cultural partner. The minimum of 189sqm on the second floor would be secured within the S106 agreement.

116. Whilst the Cultural Partner for this space has not been confirmed to date, the applicant team have been in consultation with range of cultural operators to aid in designing this space to ensure that it would be meet the needs of and has been flexibly designed for a range of cultural partners; New Diorama Theatre is an example of one cultural partner the applicant team have engaged with and they provided a statement of support within the Culture & Social Value Strategy document.

117. The submission sets out the cultural partner for this space would need to commit to a minimum number of discounted tickets per year, a minimum number of outreach, engagement and participation activities per year (such

as school programmes, community events and learning activities), and diversity and inclusion targets including commissioned artists/performers, staff or audiences. These details would be agreed as part of the Cultural Management Plan secured via the S106 agreement. In addition to this, there is a commitment from the applicant to a peppercorn rent for the cultural operator, a fair and reasonable service charge and the all necessary and reasonable costs related to fit-out would be covered by the owner; these details are secured within the S106 agreement.

118. To ensure that multifunction space is primarily used and run by the charitable operator or by a community group, no part of the space can be used for more than two private events a month (this will not exceed 10 hours in length and would not be able to take place over more than two calendar days). The full details of the management of this will be secured within the Multifunctional Cultural Space and associated cultural and visitor management plans.

Food and Beverage Social Enterprise Offer

119. A food and beverage social enterprise offer is proposed at ground floor level and either at level 01 or level 03. A minimum of 30sqm would be provided at ground floor level within the proposed retail units; this would be public facing. On either the first or third floor a minimum of 120sqm of floor space would be provided, this is proposed at either the first or third floor depending on the needs of the operator, the floor space at first floor would be publicly accessible. The operator would be required to be a social enterprise, charity or operator with demonstrable social purpose that provides employment, training and outreach. It is noted that exact location on the first or second floor has not been identified this is because it would depend on the needs of the social enterprise operator. Due to the Use Class applied for on the first and third floors, there is potential for further space to be provided if required by the social enterprise operator. The minimum of 120sqm on either the first or the third floor would be secured within the S106 agreement.

120. An example social enterprise operator that the applicant team have been in consultation with are Fair Shot. Fair Shot is a social enterprise café and registered charity that aims to provide adults with disabilities and/or autism with employment and training opportunities to become skilled baristas and café assistants. Beyond Food Foundation is another social enterprise operator and charity that the applicant team have been in consultation with, this organisation that provides support to people who have suffered trauma, poor mental health or incarceration through the delivery of practical kitchen-based training as well as a publicly accessible restaurant. Both Fair Shot and Beyond Food Foundation have provided a statement of support within the Culture & Social Value Strategy document.

121. The submission sets out that the Social Enterprise operator would need to commit to a minimum number of employments, training or apprenticeships per year, a minimum number of community engagement activities per year, a minimum percentage of the workforce from underrepresented communities or target groups. These details would be secured within a Social Enterprise Retail Space Management Plan secured by the S106 agreement. In addition to this, there is a commitment from the applicant to a peppercorn rent for the social enterprise operator, a fair and reasonable service charge and the all necessary and reasonable costs related to fit-out would be covered by the owner; these details are secured within the S106 agreement.

122. It is considered that the proposal would provide a robust and compelling new cultural offer for the site and would act as a new destination for the City in line with the Destination City initiative and in accordance with policies CS11 and DM11.1 of the Local Plan, as well as policy CV2 of the emerging City Plan 2040.

Design and Heritage

123. 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 draft City Plan 2040, and London Plan policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4,GG1-3, GG5, GG6.

Principle of a Tall Building

124. 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).

125. 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.

126. 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).

127. The application site is located within the 'Eastern Cluster' policy area in the adopted Local Plan (CS7, fig G). In the draft City Plan 2040, the proposal is within the City Cluster Tall Buildings Area (fig. 14). The application site is not

within the City Cluster Key Area of Change in the emerging Plan and, as such, emerging policy S21 does not apply.

128. The application site is not in an area identified as inappropriate for a tall buildings as shown on fig. N of the 2015 Plan, and is within the City Cluster Tall Buildings Area, shown in fig.15 of the emerging City Plan 2040.

129. Within the latter, the relevant contour lines (fig.15) to the application site are the 100m line to the east and the 120m-180m 'stack', 200m and 220m lines which cross the site. The proposal would comprise a lower 'shoulder' between the 100m and 120m-180m 'stack' and a tower element leaning pronouncedly within and away from the 120m-180m 'stack' and well below the other relevant 200m and 220m lines. As such, the proposal would not exceed the height of the contour lines crossing the site and would, in the language of S12 (3), mediate successfully between those contour lines relevant to the application site. As such it is considered to be of an appropriate height and comply with emerging City Plan 2040 policy S12 (3).

130. 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 CS 14 and emerging City Plan policy S12.

Tall Building – Impacts

131. 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:

132. The proposal would be read as part of the consolidating City Cluster, helping to consolidate its northern zone and, particularly when viewed from Tower Bridge and other south-easterly viewing points, its eastern edge. The height and form of the proposal has been almost wholly shaped by the Outstanding Universal Value of the Tower of London World Heritage Site, as experienced particularly through LVMF view 10A.1 from Tower Bridge; 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.

133. 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.

134. The siting and height of the proposal have been carefully designed so that its massing and eastern elevations lean into, and towards the centre of the

Cluster, in order to display clear deference to and clear sky separation from the WHS and other sensitive heritage receptors to the east. Equally, by virtue of its dynamic elevational design, it would be read as a positive architectural diversification of its northern edge which complements the cluster's overall composition.

135. 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 specifically chosen to create gentle undulation among the rooftop heights of the existing and consented neighbouring towers to the north that step down towards the northern 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.

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

- Undershaft: 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: 155.70m
- 70 Gracechurch Street: 155m

Visual impacts:

The views of buildings from different distances:

137. Of the long range views D9 C (1; a; i), these have been tested in the HTVIA March 2025 view Nos 1, and appendix views I, J, K, L, M, N, O. Following representations made to the EIA scoping and initial consultation by Tower Hamlets, an additional long range view was added to the addendum pack. Some of the comments received from statutory consultees, including Historic England and Tower Hamlets, relate to these views, the impacts of which are discussed throughout the report and in detail in the Strategic View and Heritage sections of the report. In all relevant LVMF views, baseline and cumulative, because of the proposal's siting on the north-eastern side of the Cluster and its form and modelling, it would preserve the setting of St Paul's Cathedral as the Important Landmark as well as the composition, features and characteristics of the LVMF views. In relation to long range views, the development would comply with Policy D9 C (1 a; i).

138. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are largely demonstrated in Views no. 2, 3, 4, 5, 6, 7, 8a, 8b, 8c, 9, 10, 11, 12, 13, 14, 15, 16, 23, 24, 28, 30, 31, and appendix views A, B, C, E F, G, H, P. Some of the comments from statutory consultees, including the GLA and the LB Tower Hamlets, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

139. In both baseline and cumulative scenarios, in mid-range views from all directions, the proposed development would compatibly integrate into the Cluster and would be intrinsic to reinforcing and defining its overall silhouette and form. The development would appear as a striking new part of the northern periphery of the Cluster, mediating down in height from the taller building at 110 Bishopsgate, to 70 St Mary Axe.

140. From the west, the observer would begin to experience the dynamic form of the proposals with its striking rectilinear expression, leaning form, playful bay detailing, and expressive biophilic base and corners. From the south and east, the south elevation would be prominent, and in views from the east glimpses of the eastern elevation would also be experienced revealing the expressive leaning profile, and double height biophilic corners that feature trees, as well as the large areas of façade which are made up from a refined and playful bay module, which would be applied in a dynamic way that responds to environmental conditions and the structural diagram of the building. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).

141. In relation to immediate views, (London Plan D9 C (1; a; iii)), views no. 17, 18, 19, 20, 21, 22, 25, 26, 27, 29, 32, 33 illustrate the closer range views of the building and how the building is experienced at street level from Bishopsgate, London wall and Houndsditch (west), Bevis Marks (east) and St Mays Axes (south). Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall

buildings with a landmark status, with a uniquely permeable, lightweight, and highly biophilic base. While these immediate views would change, as the proposed building would be larger and wider than the existing buildings, it would however have a positive relationship with the street, creating a vitality and activation though the public realm – Camomile Park – designed on this southern elevation which would also be an inclusive and highly planted space. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

142. 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 northern 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).

143. 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 high high-quality, deeply modelled and interesting facade, with playful contextual references, and successful proportions, which seek to mitigate a number of environmental challenges. The development would also provide the Camomile Park - a densely greened public realm - across multiple levels at the base of the building, offering visual relief and unique public amenities. Overall, the architecture is well-considered in the round, and of a high quality, which would be visually distinctive and an attractive addition to the skyline in of itself, and is considered to comply with D9 C (1; c).

144. 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 and have identified that the proposals would result in enhancement of the significance of the London Wall SAM and the former Churchyard of St Augustine Papey, both of which are on the application site. 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).

145. 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 HTVIA March 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, recessive tower profile (shaped almost entirely by considerations of OUV) 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).

146. 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).

147. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered to be minor adverse but the effects are 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.

148. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via 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

149. 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).

150. The proposed servicing strategy would create a new vehicular access on Houndsditch to access a newly formed dual use area which would host blue badge parking bays and be activated with public use between 7am and 7pm and outside of these hours, the area would facilitate delivery, servicing, refuse and recycling activities. There are two servicing bays in this area to

accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis 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.

151. The proposed permeable ground floor with pedestrian routes though the building, the setting back of the building line and the creation of Camomile Park 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 of 6B, with underground and rail stations in close proximity, as well as numerous bus routes and cycle superhighway nearby in accordance with D9 C (2; c).

152. 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 a pedestrian priority scheme within Camomile Street, which will be subject to feasibility studies, detailed design and consultations. The S106 agreement will 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).

153. 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).

154. 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).

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

Environmental Impact

156. 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.

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

Cumulative Impacts

158. 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

159. The proposal would not incorporate an elevated public space and this is, in this instance, considered acceptable for the reasons set out above in the section on uses, noting also that D9 (D) requires that these areas 'should', not must, be incorporated.

160. Free to enter, publicly accessible area would instead be provided by in the form of a striking new multi-level public park at street level, better signify the history of the historic churchyard on site and newly reveal a section of the Roman wall below. This would add extensive greening to the street, legible in far-reaching views from surrounding approaches, in addition to illuminating the City's rich history. Located at street level, direct step free accesses is afforded these spaces from the public realm and would include a public toilet. The upper levels would be accessible via a prominent feature lift.

161. As such, the proposal would accord with D9 (D).

Tall Building, Principle, Conclusion

162. 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 Policy CS 14 and emerging City Plan 2040 policy S12.

Architecture and Urban Design

Existing Context and Building

163. The development site is located towards the north of the City Cluster, and comprises two buildings, and to their south, located centrally between them, a historic churchyard and burial ground. The buildings are not listed or identified as non-designated heritage assets or located within a Conservation Area. However, the churchyard and burial ground are identified as a Non-Designated Heritage Asset (NDHA). Furthermore, the buildings traverse the known remains of the Roman Wall – designated as a Scheduled ancient monument.

164. The site forms part of a regular street pattern comprising other large-scale tall buildings, however, they do not directly adjoin any other development and, as such, are freestanding with all elevations addressing streets. To the north, south and west, the site is bound by wide, heavily trafficked fast fast-flowing roads, Houndsditch A1211, Bevis Marks A1211, and Outwich Street, respectively. The east of the site fronts St Marys Axe, a pedestrian priority cycle way, with some hard and soft landscaping. The layout of the street pattern is such that it forms the western edge of a major traffic peninsula which curves/bends quickly round to the north, which limits sightlines to oncoming traffic, most acutely at the corner of Houndsditch. While there are formal signalised crossings, the current configuration means that there are a high number of informal crossings at key pedestrian design lines, which do not offer good visibility, making crossing the road challenging and unsafe. On all but the eastern edge, the pavements widths are constrained and offer no urban greening, in the form of street trees or rain gardens, or any other amenity or seating.

165. Set behind the pavement line between the two buildings towards the middle of the southern elevation, is a small green space that delineates the former medieval and post-medieval burial ground of St Augustine Papey and remains of the St. Martin Outwich Churchyard. This space offers a degree of soft landscaping through low-laying evergreen shrubs, however, owing to its southern boundary wall and railing, it has an inconsequential visual presence on the street scene, with no inscriptions to indicate the plot's historic function or entrance. The churchyard is also flanked to the west by the service route to Camomile Courts internal bin store, where bins are wheeled out for on-street servicing. As such, this area reads as a curious back-of-house space, which pedestrians are detached from and disincentivised from engaging with.

166. The buildings themselves are a pair of 1980s, to early 1990s office buildings. Camomile Court (western building) measures 7 storeys in height whilst its neighbour 63 St Mary Axe (eastern building) rises to 9 storeys. In terms of scale, the buildings on site are among the smallest on the surrounding streets being flanked by: Heron Tower (230m) immediately adjacent to the west; by the Pan Pacific Tower (158m) diagonally to the north west; 100 Bishopsgate (172m) diagonally adjacent to the south west; and 70 St Marys Axe (90m) adjacent to the east. Further north the scale of development drops, to be more

in keeping with the historic character of townscape around Devonshire square and the Bishopsgate Conservation area to the North.

167. In terms of their character and appearance, both buildings take on a typical postmodern style, with their facades ordered around classical architectural hierarchies and motifs such as tall and fortified/muscular base of granite with limestone elevations above featuring weighty stone pediments and cornice lines, metal window balustrades, and in the case of Camomile Court, highly reflective green glazed windows. With respect to their contextual streetscape response, the ground floor of Camomile Court, which turns the corner onto Houndsditch, sets back its building line to give a little generosity to the street, albeit that the space is guarded by muscular granite columns and small upstand, so that it remains inaccessible to pedestrians. This frontage is particularly hostile with a high degree of solid frontage and dark tinted glazing which offers minimal intervisibility and animation to the street. 63 St Mary Axe is the more successful of the two, since the ground floor offers a number of shop front bays, and on its south eastern corner double height clear glazed shop windows which animate the corner and public realm – providing some additional passive surveillance to the route. While the buildings' entrances are at grade and all face onto the primary streets they address, unlike 70 St Mary Axe, the overall urban design quality of the ground floors along these street frontages is poor with very low levels of activity and engagement with the street. Instead, taken together, these frontages are experienced and characterised as being generally hostile, with very few pedestrian amenities and narrow hardscaped pavements, which combine to make the base of the buildings uninviting, and the routes that they line, places that people move quickly through. Owing to the poor quality of the ground floor frontages, though made from high quality materials, the buildings are not considered to be of any particular architectural quality, and as such, reveal an opportunity for considerable townscape and urban design enhancement.

Proposed design

Bulk, scale and massing

168. The proposal is for a tall building to be erected on site, rising at its highest point to 190.65m AOD. The massing diagram of the building can be broken into three elements: the base, middle, and upper tower.

169. The massing and bulk of the base of the building has been designed to step in from the existing pavement lines along the south and west and parts of the north, to create greater breathing space around the base of the building, and enlarge the public realm, albeit behind large structural columns. To the south, this setback would be 12.5m deep from the kerb edge and 22m tall, and within it enough space to delineate the historic churchyard and create a new public park – Camomile Park- around it which would also be layered vertically, providing additional public spaces at higher level. The north-west corner is also deeply set back and voluminous, giving relief to the street corner, in

addition to the north east corner where there would be a double height space, publicly accessible during the day when not in use for out-of-hours servicing. Again, forging additional space at the street for people to move through. Suspended in front of the primary glazed base podium are a series of balconies, walkways and 'Bastions' which offer places to rest and dwell, and which have been designed to exemplify the radically public character, and verdant nature, of the building's base.

170. Above this, the middle stages of the building would extend to level 27, filling out laterally, just beyond the existing building lines, and creating a shoulder height marginally taller than the top of 70 St Mary Axe to the east. At this point, the massing would step back considerably from the northern elevation, revealing a series of large terraces for office occupiers, and from which the tower element would ascend to its full height.

171. The tower has been carefully and successively designed in relation to viewing experiences from Tower Bridge (LVMF view 10A.1; and to a lesser extent the views from Queen's Walk (LVMF 25A.1-3) to interpret the Outstanding Universal Value of the Tower of London WHS. More specifically, its form is kept narrow, at two bays wide, on its eastern elevation, which has also been inclined so that it leans back away to the west, away from the ToL, to which it would present a clearly deferential raking profile, and considerable clear sky separation, in the Tower Bridge view particularly.

172. The total height of the proposal would be less than the Gherkin to the south, and the Heron Tower to its west. Within these parameters, the tower would be given a unique and elegant silhouette, which tapers upwards, and assimilates into the folds of the Cluster, the composition and character of which is comprised of a rich variety of unique tower forms which step up in height towards its centre. The total height of the tower, which is shorter than the height of its neighbours to the west and south, is also considered to successfully respond to its strategic context and location, in addition to the shoulder height struck at level 27, which marks a concerted stepping down in scale towards the northern boundary of the City Cluster tall building policy area, and smaller scaled development to the north east. Consequently, officers consider the bulk, massing and scale of the tower to be successful.

Architectural expression:

Upper levels

173. The expression of the tower is derived from its elevations that would be wrapped by a highly modelled and crisply detailed structural frame of light neutral-toned concrete, in set with a layered concrete bay module. The elevations take on a generally horizontal emphasis, with repeating rectangular bays, typically 6m long and a storey high, staggered and stacked in bands, much like a brick bond, to create visual interest and movement as the tower rises in height. Depending on the aspect of the elevation and the

environmental conditions, the bay module varies to provide varying degrees of shading and solidity, which at its greatest would be 650mm, and at its shallowest, 200mm. The result being a deeply modelled façade of vertical and horizontal elements, with areas of playful detailing and texture. Each bay types would be fabricated with pre-installed components.

174. The components of the typical module include a projecting outer concrete frame, textured solid spandrel upstand and vertical panels, pattern perforated metal side panels to provide ventilation, and a high-performing low-iron glazing designed for easy maintenance and internal glass replacement. The configuration of these elements varies, with there being 4 typical bay types, to promote environmental efficiency, as well as provide interest across the façade, but also in response to technical constraints, such as the column line, which though this design would be fully concealed from external view. Passive solar shading from the high degree of solidity within the façade, designed to generally achieve a 60:40 proportion of transparency to opacity, and opening ventilation panels that would be automated to facilitate night purging, and are integral parts of the building's sustainability strategy, and its architectural appearance, which at night also has the benefit of significantly reducing the perception of artificial lighting from the building's interior.

175. The solid internal panel components are proposed to be concrete textured with aggregate and patterned to provide relief and playful detailing. Taking inspiration from the name of the street, the pattern proposed to be debossed into the textured aggregate panel is that of the camomile plant's petal array. Further detailing and design development of these features will be secured via condition, to ensure the design quality and intent follow through to technical design.

176. Areas of facade needed to screen plant enclosures – located at levels 14-16 and 42-45, would use a different internal panel design - a small-scale perforated stretcher bond - to provide the necessary ventilation requirements for mechanical plant equipment.

177. Double order bay types are used as a defining feature of the northern elevation, marking the shoulder height, to provide a more successful promotion to the top of this element, and also to express the towers corners through a unique arrangement of external terraces. Each corner of terraces are two bays wide, and staggered vertically to create generously sized, two-storey outdoor spaces on each level, accommodating trees of 5-6 meters in height – so that every floor has access to nature and fresh air. The trees will be set within an fully integrated planters, and their species selected to suit the varying environmental conditions as the building rises in height to ensure that they thrive. A detailed landscape condition, specifying the species, soil, planter design and management plan for these trees will be secured via condition. The balustrades to these terraces are purposefully subtle, designed as simple metal railings at 1.6m tall, to ensure they are not overly prominent

in views. Final details of which will be conditioned to ensure full compliance with the CoL suicide prevention SPD. Architecturally, the terraces form bookends to the building's southern elevation and act as green signposts for the building.

178. On the southeast corner, the linear run of deep set terraces characterise the leaning profile of the tower, further pushing the massing away from sensitive heritage receptors to the east, and softening the eastern elevation in these views, while being careful not to be overly visually distracting – through the use of a very refined palette of plants. In such views, the crisply refined structural frame of the building would remain the primary architectural element. Overall, the inclusion of these terraces on the corners of the building is considered a highly successful architectural flourish, which helps to humanise the architecture, give it interest, promote high levels of urban greening, and celebrate the building's contribution to local townscape.

Top

179. The building's top and upper levels would be crowned by the architectural frame, set within which would be the building's fully screened plant floors and BMU store. The frame would extend beyond the entire enclosure, in a double-storey arrangement, enveloping it while creating voids that introduce a sense of lightness and provide shifting visual relationships from different vantage points. The very top roof elevation would also be wrapped by this frame, to ensure all plant is fully integrated within the architectural envelope. To meet ventilation requirements, the enclosure incorporates an open masonry architectural screen, scaled down to echo the primary façade modules, achieving a cohesive and uniform aesthetic. While being a functional piece of design, the designs would also offer interest and successfully refine the crowning expression of the tower's top, while ensuring all plant and BMU equipment are visually integrated and screened from view.

Base

180. The design intent of the base of the building is to provide a more active, engaging and welcoming base to the tower, with a distinctly public and open character, better rooted into the fabric of the city. On the south and western elevations it does this though floor-to-ceiling clear glazing that maximizes views internally to publicly accessible areas, such as; the two routes through the interior of the building on the east and west; the retail units lining the western ground floor frontage; the south eastern cultural auditorium space; and to the cultural/amenity spaces which make up the first three floors of the building. The auditorium's southern façade would also be fully openable, so that the interior and exterior space can coalesce. The high degree of clear glazing would also enable unobstructed views externally to the green space of Camomile Park and the planted balconies and walkways, which are the defining feature of the principal west and southern elevations. That said, there are moments of solidity, required to screen functional internal areas, which bring balance to the elevations, in addition to the use of solid textured

aggregate bands, which wrap floors 0-4, in a warmer earthy tone, in homage to strata of the Roman wall below. On the north and eastern elevation, the bays would take a double height order and be framed with projecting concrete – to coalesce with the expression of the framing system used above. The majority of these bays would also be clear glazed, though a small proportion would be required to provide ventilation, and so would be louvered by an architectural screen, again, matching the design proposed above. The soffits for all areas within the external base of the building are to be coffered timber, though final details of all materials and finishes will be reserved for condition.

181. The building's 4 main entrances have been designed to be highly visible and generously scaled, marked by large, brightly coloured, hanger-style sliding doors. The size and playful use of colour of these entrances would make them highly legible arrival zones, which inspires interest and engagement with the base of the tower in a unique way. Similarly, the structural columns would be clad in concrete and given bespoke patterns, playfully referencing the historic street names of the site. While full details of these elevations, their materials and finishes will be specified via condition, officers consider that the configuration, layout and appearance of the building's base and ground floor register would be highly permeable and dynamic, with engaging active edges that would radically transform the site's contribution to the street scene.

Public realm and green spaces:

182. The creation of additional public realm and green space in the form of Camomile Park is proposed on the set back southern elevation. Here, in addition to enhancements at ground level, the proposals would introduce a new vertical park, comprising a number of publicly accessible levels from ground to level 5, providing a unique integration of nature within the urban environment. The southern elevation offers the greatest levels of natural sunlight to the ground, and as such, this location is the best suited on site for emblematic biophilic design, and new pedestrian dwell spaces.

183. At ground level, the landscaping areas are arranged in a linear fashion adjacent to the street edges, with large planting beds located at the base of the building's columns, creating pockets of dense greening and seating nooks away from major people flows. These provide intimate spaces to relax in, as well as helping to frame the main building entrances. The landscaped planting beds are of a scale and design that would facilitate a high density of planting, including trees. In addition to several smaller 3-4m multi-stem trees, the south elevation would also be lined with four large specimens of differing varieties, sitting beneath the canopy of the building above. Two smaller trees are also proposed within the internal north/south route on the western side of the building.

184. The proposed planting beds and integrated tree pits would be partially located over the building's basements. However, adequate soil depths have been proposed. Officers' strong preference is for the planting beds to be

interconnected, in underground trenches, as this would provide a greater continuous rooting volume and improve water distribution, leading to more resilient tree growth, which would be better for the large trees proposed. A condition for the detailed design of the tree pits will be applied to the consent to ensure their technical design can facilitate the ambitious levels of planting proposed, and incorporate interconnected pits as far as feasible. A mechanical irrigation and nutrient delivery system, with soil moisture sensors is proposed for all planted areas, though further details will also be secured via condition following detailed design development.

185. The planting palette has been carefully selected based on the conditions of the site, and to be naturalistic in character, and provide necessary habitat, comprising a variety of woodland shrubs, grasses and perennials. The planted veils proposed for the southern elevation, spanning multiple floors and adding vertical drama, would be grown from climbing plants trained up steel cables between the walkway soffits. Closest to the building facade, shade-tolerant evergreen plants such as cultivars of ivy that are well adapted to the reduced light levels would be installed, whereas, on the external face of the suspended walkways, flowering climbing plants are proposed, some of which will be fragrant, and respond to increased light levels. Trees at higher levels have also been selected to provide berries or seeds as food for wildlife. In addition, the palette would utilise a wide variety of species, mixing native species with drought-tolerant species from other climates to balance enhanced biodiversity with the need to future-proof, for a lasting foraging and nesting habitat for animals.

186. The planter beds edges would also incorporate integrated seating, with arm and back rests, and on the eastern end, a long in-built stone bench and table, with drinking water fountain adjacent. While the proposals offer a range of seating, the final specification of all seating and urban furniture will be conditioned to ensure it meets the highest standards of inclusivity and design quality. The ground plane would be paved with high-quality materials, which denote the pocket parks, internal routes, and importantly, clearly delineate the location of the historic church yard.

187. Located within the centre of Camomile Park, the Churchyard of St. Augustine Papey would be reimagined, made accessible, and prominence enhanced though the upgrading of both hard and soft landscape materials. The space would be legibly different from other areas of public realm through the use of contrasting, and larger scale paving slabs, taller perimeter upstands, and different planting which takes inspiration from churchyard species – white Martagon lilies. There would also be greater interpretation of the history of the site through new signage and artwork, both at grade through engraving in the surface of the paving and perimeter, in addition to elevations and the soffits above. A condition on the final specification and detailed design of the churchyard, its planting, artwork and historic interpretation will be introduced, to ensure the layers of history are sufficiently captured within the texture and detailing of this important space, such that every opportunity for interpretation

is explored. Immediately adjacent to the churchyard would be a newly revealed section of Roman Wall, which people would be able to experience at close quarters. The entangled histories of both assets would made more accessible and would reinforce the historic roots of the site, and the City more generally. Overall the design of the space is considered to be refined, and in keeping with the character of a churchyard, being quiet and contemplative, while providing a better framework for understanding the history and relationship between former church yard and London Wall and greatly enhancing their settings.

188. Above these spaces the design proposes a series of suspended walkways and balconies and corner 'bastions' spaces, again referencing the Roman wall below, with integrated planter bed and framed by vertical veils of climbing plants. On the western elevation, it is envisioned that spill out from the ground floor retail units would be to the balconies above. Access to these is announced by a feature lift – colourful structural frame, with green roof, and stairs – also brightly coloured to ensure vertical access to these upper levels is legible and clear. Camomile Park would also include a publicly accessible toilet – providing much needed amenity for its users. While the intention is for these balconies and walkways, to be lightweight in appearance, and have coffered timber soffits, full details of all materials will be conditioned to ensure they are of high quality, and inclusive.

189. To the north, the servicing bay, with two blue badge parking spaces would also be a public realm feature, which would be activated by adaptable uses, including events such as markets, pop-up retail, and community engagement events. A S106 obligation will be attached to the permission whereby a plan for how this space will be used in the non-servicing hours will be secured to meet this aspiration.

190. With regard to the management of all public realm and the cultural spaces proposed on site, a Cultural Implementation Strategy, secured via condition/s.106 will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the LPG (London Plan Guidance) 'the Public London Charter'.

191. At this design stage, the only hostile vehicle mitigation (HVM) proposed is for a line of bollards to run around the perimeter of the north east loading bay. Any other necessary building-related security measures are expected to be discreetly integrated into the proposed facades and landscape designs of the building, such that it would not negatively impact the quality of the landscape, public realm, or architectural design of the proposed development. Details of the HVM strategy will be conditioned to ensure high quality design.

192. Higher up the building, at level 27 and 28, two large private terraces are proposed as office amenity, and would also comprise high levels of greening, with a diversity of planting species, and integrated external seating. The level 28 terrace, being set further from the west, would also incorporate some multi-stem trees, and which would screen the BMU parking area in the western corner.

193. Overall, officers consider that the proposed designs for the landscape, which are central to the overarching design vision of the site, are well considered and transformative; creating new spaces that cater for a wide range of users, and are supported by important facilities to ensure the space is equitable and sustainable. The ambitious levels of greening, plant variety and naturalistic aesthetic quality are also welcome and would help encourage nature to repropagate within the city, and in doing so bring people, including residents from local communities, closer to it. Equally, the dramatic vertical nature and large scale of the tree planting, would mean that the visual impact of the proposal would be great and far reaching, such that these landscape features would become a beacon or oasis of green within the city, signalling from afar that they can be freely and spontaneously engaged with – radically transforming the character of the streets within the northern Cluster for the better.

Conclusions Architecture and urban design:

194. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. It would improve the site's interfaces with, and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. 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 GG1-6.

195. The proposed development would be a sophisticated interplay of expressive, playful design and functionality, combining office, public, and cultural spaces within a visually compelling and contextually responsive form. The design throughout seamlessly integrates public amenities and generous urban greening, with the towers' edges defined by tree canopies, and at its lower levels, the multi-levelled Camomile Park, which would host the reimaged Churchyard and revealed Roman wall. Collectively, these elements 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 City Plan policies S10 and DM 10.1, and Draft City Plan 2040 policies S8, relevant sections of the NPPF and National Design Guide.

196. In terms of design and provision of public realm the proposals represent compliance with Policies D3, D4, D8, G4, T1 and T2 of the London Plan 2021, as well as CS3.3, CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies OS1, S10, AT1, S8, DE2 and DE3 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

197. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design. In respect of D4 A, the applicant's evolution of site development was design-led to deliver high quality design and place making and this is detailed in the Tall Building, Architecture, Urban Design and heritage sections of the report.

198. In respect of D4 D, the proposals have been to the London Review Panel and been workshopped by the City of London Access Group (COLAG), in addition to a rigorous local borough process of design scrutiny as required by the policy. The applicants also undertook extensive preapplication engagement with a variety of stakeholders, including the GLA, Historic Royal Palaces, Historic England and others. At pages 48 to 52, the design and access statement sets out how the scheme has changed and evolved as a result of officer and stakeholder feedback, showing the evolution of the scheme in response to feedback from these external organisations and officer comments.

199. In relation to D4 E, parts 1-6, there has been a City level of scrutiny comprising extensive officer topic-based reviews over multiple pre-application meetings; external input has been provided by other experts as set out above. In addition, the applicants brought the scheme to the London Review Panel which was attended by experts from different disciplines, these comments were mindful of the policy context and clearly set out recommendations. The London Review Panel set out several recommendations which have been considered by the design team. City of London officers views on topics which the LRP comments have been set out elsewhere in the architecture, heritage and views section of this report.

200. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity and avoid deferring large elements of the development to the conditions. The recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard.

201. Overall, the application process has adhered to the policy approach set out in London Plan D4 Delivering Good Design.

Strategic Views and Heritage

202. 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.

203. 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 split of view visualisation types (render, wireline, and computer-modelled representation) is based on the proximity and sensitivity of the views, to represent the impact of the proposed development. All of the viewpoints were agreed in consultation with officers. The split of assessment and appendix views, of verified and non-verified views, and of render, wireline and computer modelled representation, is based on the proximity and sensitivity of the views.

204. Consultee responses and objections have been received from Historic England, Historic Royal Palaces and London Borough of Tower Hamlets, which relate to the perceived impacts of the proposed tower on strategic views and the OUV of the Tower of London World heritage site, and best practice in terms of impact assessment in accordance with policy guidance for Impact Assessment in a World Heritage context (2022). These are referenced and discussed in detail below. Some months ago, Historic England notified the World Heritage Centre of the application, but at the time of going to print no response from them has been received, nor an indication of when it is likely to be received.

Tower of London World Heritage Site

OUV and Relationship to Setting:

205. 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.

206. 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.

207. 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.

208. 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.

209. 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.

210. 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.

211. 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.

<u>Impact on OUV/Significance</u>

212. 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.

213. Consultee responses have been received from Historic England, Historic Royal Palaces, the GLA, and London Borough of Tower Hamlets (LBTH). Historic England have objected to the proposed development stating that the proposal would cause harm to the OUV of the WHS and that the original submission did not adequately assess the impact of the proposal in the OUV of the WHS, going as far as to identify categorise that harm in NPPF terms as in the low to middle part of the range of 'less than substantial'. In the amended submission a fuller HIA has been provided by the applicant.

214. Historic Royal Palaces have raised concerns over the impact of the proposals on the WHS and ToL from LVMF View 10A and contend that the profile and massing of the proposed tower element of the development, would fail to preserve this key view.

215. The GLA have identified a low level of indirect harm, 'less than substantial' to the "setting of the ToL" due to the closing of the sky gap between the White Tower and the Eastern Cluster. As the proposal is considered to result in a very low to middle level of less than substantial harm to heritage assets, the proposed development is therefore contrary to Policy HC1 and HC2 of the London Plan.

216. London Borough of Tower Hamlets (LBTH) have observed that the proposed development, when viewed from LVMF view 10A.1, would result in 'only limited harm to the WHS, taking into account the number and variety of views in which they are experienced together'.

217. Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England, Historic Royal Palaces and LB Tower Hamlets on the proposal and conclude that there would be no harm to OUV as captured in views 4, 5. 6, 8a, 8b, 8c, 9, 10, 11, 12, 13, 14, 15, 16, and appendix views E, F, and G of the HTVIA March 2025, and the model video of the kinetic viewing experience over Tower Bridge, for the reasons set out below.

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

218. This viewpoint is also identified as a Representative View in the Local Setting Study (LSS) (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge) in the LSS. The view is of particular importance in appreciating the 'Internationally Famous Monument' and 'Landmark Siting' attributes of OUV.

219. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space

around the White Tower, and that where this has been compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the 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 Station towers, BT tower, Centre Point and Tate Modern (para 182), which all combine to draw and hold the attention of the observer.

220. In the foreground of this view, the Tower of London WHS forms an important visual centre of gravity, with its legible and consistent stretch of historic townscape and iconic silhouette of the White Tower. Due to the elevation of the viewing point and the topography of the City, the area of the WHS west of the White Tower does not form a historic skyline because the modern City is seen immediately behind it as a backdrop; in this area of the view the towers of the Cluster form a distinctive modern skyline.

221. The visual management guidance anticipates the consolidation of the Cluster which, it is said, '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 (para 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground, applying particularly to the Monument (para 185). The visual management guidance states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).

222. From this view point (HTVIA View 8b), the proposed development would appear at the north eastern edge of the Cluster, sitting in front of 110 Bishopsgate (Salesforce/Heron Tower) and 136 Bishopsgate (Pan Pacific), providing an eastern endpiece to the baseline and cumulative Cluster form. The proposed tower would be visible between 30 St Mary Axe (the Gherkin) and the White Tower, with a slim sliver of the 136 Bishopsgate projecting beyond. The proposal has been fundamentally shaped by this view and, accordingly, 'leans' back into the Cluster at a clearly deferential angle, away from the WHS.

223. Historic England have objected to the impact of the proposal on the OUV of the WHS in this view, claiming that the proposal would create a 'cliff edge' that would present 'a greater distraction' in the view, in addition to making the Cluster 'increasingly overbearing overall'. More specifically, "compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed detailed design."

224. This sentiment is broadly echoed by HRP, though they only raise concerns over the impact of this view, and the GLA who note that from this view "an area of open sky will be obscured by the proposed development" and that "

the building will be closer to the viewer than either the Salesforce Tower or the Pan Pacific Hotel." Similarly, LBTH observe that when viewed from 10A.1, the proposed development would intensify the visual dominance of built form and contribute to the crowding of the White Tower's immediate setting…reducing the sky space between the cluster and White Tower and competing visually with the corner turrets. LBTH also suggest that a tall building without a leaning form and calmer appearance might better respect the setting.

225. In this view, the proposals' leaning/sloping eastern edge, tapering tower form and calm geometric fenestration would be read tilting back and away, deferentially, from the WHS and into the Cluster. The form of the tower, and its unique leaning massing, has been designed and refined successively at preapplication stages in response to this highly sensitive view, and site constraints at ground level, to maximise the visual separation between the White Tower, and consolidate the composition of the cluster in its backdrop. More specifically, in response to this view, its design has been curated around a set of existing massing parameters, and visual relationships, such that it conforms to the stepping down of Cluster towers – sitting below the crowing pinnacle and BMU rails of the Gherkin, and below the height of the Salesforce/Heron Tower beyond; and below the ToL White Tower's weathervane. In addition to the massing of the tower, its tonality has been designed to align with the Cluster, using cooler tones, to ensure ToL White Tower's Caen Stone remains visually prominent and distinctive.

226. The baseline and consented (cumulative) Cluster of towers steps downwards from the centre at 22 Bishopsgate (and 1 Undershaft in the cumulative) in a deferential manner towards the WHS. This profile has been carefully negotiated through numerous planning decisions to mediate between the Cluster and the WHS. Under both baseline and cumulative scenarios, the height and stepped form of the proposal are considered to create a successful terminus to the Cluster when seen from this viewpoint and would be consistent with the long-term Cluster curation described above.

227. The LVMF SPG (para 186) seeks to maintain 'some' visual separation between the upper parts of the White Tower and the Cluster; the guidance in the Local Setting Study (LSS) for this view seeks to ensure that 'buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point'. Officers acknowledge that the proposal would occupy a small degree of additional clear sky space between the White Tower and the Heron/Salesforce tower and Pan Pacific - which currently form its distant background. However, the encroachment into this space is minor, with the building moving no closer to the Tower into this space (in the vertical plane) than the Pan Pacific Tower. Equally, being sited immediately adjacent to both towers, at over 700m away from ToL, the proposed development would maintain a clear sense of visual distance, separation, and visual dissociation, all of which would clearly reinforce and maintain visual separation between the Cluster and the WHS.

228. Although it would add some additional built form into this view, through the height of the proposed tower rising approximately to the level of the

weathervane of the ToL south-west turret, its leaning form would create a softened and recessive edge which would step deferentially back and assimilate into the Cluster. As such, it is considered that its profile would be sufficiently deferential so as not to dominate the White Tower or diminish its perceived scale by drawing that of the centre of the Cluster too close or challenge the iconic qualities of this silhouette or the gravitas of the WHS as a whole.

229. In addition, the tonality and ordered nature of the facades would ensure the proposed development would assimilate successfully with the character and composition of the Cluster, again, comfortably disassociated from the WHS, which would remain clearly legible and appreciable by the viewer. The WHS would be the closer and would remain the dominant and indisputable focus of this view. In respect of LBTHs observations, officers consider that the proposed tower design strikes the appropriate balance of deferential, recessive, massing through its leaning form, while being clad with an ordered and calm façade, that subtly contrasts with the materiality of the Tower, such that it would not be a distracting presence within the setting of the WHS.

230. For the aforementioned reasons, the proposal would, under baseline and cumulative scenarios, preserve the ability to appreciate the WHS as an internationally famous monument, that sense of its landmark siting in relation to the City and the physical dominance of the White Tower, the attributes of OUV that are particularly captured by this view. It would not 'dominate' the WHS, would not directly interact with the protected silhouette of the White Tower and would maintain visual separation between it and the Cluster, all in accordance with paras 183 and 186 of the LVMF SPG. The proposal would relate appropriately to existing skyline features and, in the way it would consolidate and 'complete' the eastern edge of the Cluster when seen from here, would support the Cluster's contribution to the character and stature of the view, in line with para 187 of the SPG.

231. The proposal, then, would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 , emerging City Plan policy S11, HE1, HE3 and S12,London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and the CoL Protected Views SPD.

232. The Monument is also within this view and situated at a distance from the orientation 'pivot' of the view. The proposal would leave undiminished the Monument as an important landmark element and would not affect the skyline presence or pre-eminence of those other landmark elements: City Hall, HMS Belfast or a recognition and appreciation of St Paul's as a Strategically Important Landmark (SIL). It would preserve their strong group value with other elements and allow for an appreciation of the scale and geography of London, in accordance with para 185 of the LVMF SPG.

233. Thus, it is considered that 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) Draft 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.

Dynamic/kinetic journey across Tower Bridge

234. Historic England has identified harm from the impact of the proposed building in the sequence of views of the WHS as one proceeds northwards over Tower Bridge, approaching the WHS, and onto the northern bridge approach. Historic England considered that the proposal would 'leave less of the kinetic experience unimpacted. Consequently they consider that the Tower would appear less apart from the City.' HE also reference the Tulip enquiry (IR14.28) noting how the inspector identified 'that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it'.

235. The experience is identified in the LSS as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the LVMF 10A.1 viewpoint from the bridge discussed above. The identified aim is 'to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than 'lost in the City', in which the scale of the White Tower is perceived as more prominent than the buildings surrounding it; and in which the military architecture of the Tower and its defences can be appreciated.'

236. A video sequence from a computer model and viewpoints corresponding to this experience have been assessed in the submitted application. Moving north, from the south end of Tower Bridge to the North Bastion, the proposal would appear as an eastern endpiece to the City Cluster which gradually draws closer to the WHS as one moves over the bridge. At the North Bastion, the proposal (and the Cluster) would appear as described in the section on 10A.1 above. Beyond the North Bastion and onto the northern bridge approach, the proposal would continue to appear as part of the City Cluster which at this point in the journey has appeared behind the WHS.

237. Throughout this journey, the Cluster forms a long-established background presence that gradually draws closer to, then is seen (from the North Bastion) in poised juxtaposition with, and then gradually draws behind and moves beyond, the WHS. The proposal would be at its most prominent when seen from the North Bastion, as discussed at length in the paragraphs above. As demonstrated by the kinetic video sequence, when moving north past 10A.1 around the north bastion northwards up the bridge, it is only a matter of metres before the rest of the cluster is seen in conjunction with the White Tower, as part of its existing juxtaposing backdrop. For the rest of the journey, the proposal would read as a comparatively modest (in respect of overall height and form) addition to the Cluster that would consolidate further and be well integrated with it; particularly on the northern end of the journey where, due to the lines of sight, the proposal would cease to read as the Cluster's eastern

edge and would instead become more ‘merged’ with the existing buildings in the field of view.

238. As with the specific viewpoint on the North Bastion, officers strongly consider that, throughout this dynamic journey, the viewer is always conscious of the fact that the WHS and the Cluster are two entities, historic and contemporary, that are physically separated by a considerable portion of low-rise townscape, including the Local Setting area, and as such visually separated in most of the viewing experiences, including from Queen’s Walk and much of the Tower Bridge experience. Much of the drama and interest in this journey derives from the way in which the WHS remains the commanding focal point but is contrasted with, and set off by, the presence of the modern Cluster which underscores and enhances that ancient and overarching relationship between Tower and City.

239. Officers strongly consider that, having reached the northern bridge approach where the proposal and the wider Cluster has fallen in behind the WHS, the viewer is in no doubt that this is because the lines of sight, not the fundamental balance of this relationship, have changed; in moving across the bridge, the viewer has had ample opportunity in which to appreciate each of these entities on their own terms, as a contrasting pair, and the clear physical and varying amounts of visual separation which exists between them. While consuming a comparatively minor amount of further clear sky in the viewing experience, the proposal would not fundamentally alter this existing dynamic and would not unbalance the existing relationship between the Cluster and the WHS.

240. As such, in baseline and cumulative scenarios, officers consider that 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 and Local Setting Study.

LVMF 25A.1-3 – Townscape View, Queen’s Walk:

241. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower, and within the LSS (View 10). 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.

242. View 10 of the LSS equally identifies that development must ensure that the White Tower is able to continue to reveal its relationship to the City as a 'gateway' to the City and should not become `lost' in the City, continuing to 'tower' over its surroundings in this view as a landmark and a symbol of Norman power. And that clear sightlines to it, Buildings behind or close to the White Tower should not detract from its silhouette or diminish its perceived scale from this vantage point. In both baseline and cumulative viewing experiences, including those at night, at location 25A.1 (LSS view 10) only a small sliver of the proposed development's easterly elevation – the reclining ladder of terraces - can be seen beyond the eastern edge of 40 Leadenhall Street, where it would sit just below its shortest/lowest easterly setback. View 25A.2, located to the east, reveals fractionally more of the southern elevation, and again illustrates the proposed development's leaning form, which inclines away from the ToL and into the folds of the City Cluster.

243. No objections have been received in relation to this LVMF view.

244. 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 only be glimpsed as part of the north easter periphery of a consolidating Cluster, it would not undermine the composition and characteristics of the view or those landmark elements. 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.

245. The height and location would relate well to the existing Cluster buildings, stepping down to the north, and set in behind other prominent buildings like 40 Leadenhall Street. As such, the siting, height, and scale, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background of the ToL, 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.

246. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).

247. The proposal would help to reinforce and make more legible the relationship between two related skyline identities. The proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). It would not appear in the background of the ToL preserving the sky-backed Protected Silhouette of the ToL between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct, juxtaposed urban forms, in accordance with the visual management guidance (SPG paras 418-422) and relevant parts of the LSS. The proposal would preserve the relevant attributes of OUV and their associated components preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower.

248. In nighttime experiences, including those from LVMF 10A.1, the proposed lighting would appear subdued, with lower levels of illuminance than existing developments. This is achieved because the design of the building is significantly more solid in its elevational treatment than others in the Cluster, and the depth, staggered and solid nature of the eastern elevations terraces which would reduce the emittance of light from internal office floors and terraces. A lighting condition which restricts the levels of illumination and requires the local planning authority to assess the technical lighting design to ensure a satisfactory external appearance in sensitive viewing experiences such as this, would also be applied to this consent. Overall, in baseline and cumulative scenarios no single development within the Cluster would dominate the nocturnal skyline and the cluster would remain distinct from the prominence of the ToL and the darkness of the river would be preserved.

Other LSS Views:

Inner ward Tower Green

249. The LSS Inner Ward views are deemed to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. The LSS aims to maintain views illustrating the living tradition of the WHS, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated.

250. Under 'key issues' the LSS states that tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or affect the scale of the enclosing historic buildings. The associated 'Objectives and guidance' stats that development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.

251. The LSS acknowledges the Inner Ward to have a range of views, and the submitted application provides a comprehensive assessment of the visual impact on this place. Being entirely occluded behind the Chapel of St Peter ad Vincula, the proposal would not be visible from the Scaffold Site viewpoint

(LSS view 1, HTVIA View 13). It would be visible (along with the existing towers of the Cluster) to varying degrees from other places within the Inner Ward. From the south east corner of the green (HTVIA appendix View E), the top floors of the tower would appear beyond the western end of the Chapel, the background of which is characterised by the existing, layered background of tall buildings within the City. From the northeast corner of the Green (HTVIA appendix View F) the upper floors, and the leaning elevation of the tower would be glimpsed, at considerable distance, between the western end of the chapel and the range of buildings which enclose the Green's western edge. In views from the eastern edge of the Green, aligned with the southern elevation of the White Tower (HTVIA appendix View G), the tower would be glimpsed beyond the western end of the Chapel, not rising above its roofline, and as above, be experienced at great distance in conjunction with layers of townscape including tall buildings within the City. In these occasional instances, the level of visibility of the proposed development is minor and fleeting, and at such a distance to be entirely dissociated from the intimate and historically rich character of the Inner Ward, and the dynamic viewing experiences which characterise and reveal the significance within it. At no point would one's appreciation of the historic composition of Tower Green or the outstanding palace buildings of the inner ward be altered; or the Towers unique sense of place, apart from the city, be detracted from.

252. Where visible, in both baseline and cumulative scenarios, the proposal would appear as a subsidiary, recessive edge component of the Cluster. Its deeply modelled, calm geometric architecture would shed rather than draw attention, especially when contrasted against the larger existing forms of the Cluster. As such, the proposal would maintain that balanced, deferential relationship between WHS and the Cluster and the recessive, occasional presence of the latter in the Inner Ward views.

253. In accordance with the guidance in the LSS, 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 that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in relation to OUV attributes and components, while the relationship between the WHS 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.

254. No objections have been raised with respect of these viewing experiences.

Inner curtain wall south:

255. Views from the Inner Curtain Wall were assessed. The guidance in the LSS recognises it as a 360 degree viewing experience where the aim is to maintain an appreciation of the Tower as a riverside gateway, the historic relationship between the Tower and the river, whilst under the associated guidance seeking

to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

256. From the identified viewpoints from the south section of the Inner Curtain Wall (HTVIA View 12) looking northwards, the proposal would appear immediately to the north of the Gherkin – significantly below its apex, and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the existing cluster. The height and leaning profile of the proposal would ensure it reads as a contextually sensitive and responsive endpiece to the northeastern edge of the Cluster, receding down in height from taller buildings within the centre, to the smaller scaled developments on its fringes. As such, it would assist in consolidating the Cluster's distinct urban form and separate, long-established identity.

257. With its substantive, rock-built architectural presence, the White Tower would continue to command the foreground of these views, while views to the scaffold site, and the WHS's relationship with the river would remain undiluted by the proposal. The LSS recognises that 'modern buildings provide a clear contrast between the historic Tower and contemporary city outside its walls' – an acknowledgement of the concept of the contrast between ancient and modern buildings helping to reinforce one another's presence and contributing to the Landmark Siting attribute of OUV as a gateway to the City, and the component of this which is the established relationship between the WHS and the City beyond.

258. 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.

Inner curtain wall north (east and west):

259. The LSS, in assessing views from this place, 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 between Tower and City and that clear views of the concentric defences should be preserved.

260. From the identified viewpoints from the north section of the Inner Curtain Wall, to the west and east (HTVIA Views 15 and 14 respectively), looking northwards, the proposal would appear immediately to the north east of the Gherkin and Heron Tower and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street, all off of which it sits at significant height below. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the

existing Cluster. The height and sloping profile of the proposal would ensure it read as an eastern endpiece to the Cluster. It would assist in consolidating the Cluster's distinct urban form and separate, long-established identity. The concentric defences would remain pre-eminent and their appreciation undiluted.

261. 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.

Main entrance:

262. 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.

263. In the view from the Main Entrance (HTVIA View 11), the proposed building, appearing to the northeast of the existing 40 Leadenhall Street tall buildings and substantially lower than it, would consolidate and strengthen the eastern 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.

264. 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.

Other views and approaches:

265. In other the views and approaches to the WHS identified in the LSS, the proposal, though visible, appears as a peripheral feature on the skyline some distance from the WHS. 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.

<u>Conclusion on the Tower of London World Heritage Site</u>

266. The proposal would preserve the OUV of the WHS and the ability to recognise and appreciate the WHS as a Strategically Important Landmark and would accord with the visual management guidance in the LVMF SPG.

267. The proposal's relationship with the WHS has drawn strong objections from Historic England and Historic Royal Palaces; whilst giving great weight to

these representations, officers simply cannot see that harm would be caused and reach a different conclusion. At the heart of the matter are differences in opinion on the visual resilience of so famous a monument as the Tower and the ability of the average viewer to be capable of discerning between ancient and modern entities in the same field of view, comprehending the visual proximity and physical distance involved, and appreciating them individually and as part of an overall skyline.

268. The proposal's striking, raked angle or 'lean' into the Cluster is a clear and appropriate response to the sensitive view from Tower Bridge; here, as for so many other Cluster schemes, the World Heritage Site has clearly and fundamentally influenced the design approach, interpreting OUV in line with the explicit direction in London Plan policy HC2.

269. Perhaps most fundamentally, officers consider that, for all the reasons set out in preceding paragraphs, the evolving City Cluster, and therefore the proposal, is consistent, in principle, with the ancient dynamic between Tower and City which is particularly enshrined in the OUV attribute 'Landmark Siting'. The proposal would appear as a new element of the Cluster, with varying degrees of prominence in the views of the Tower, but officers, for the reasons set out in the preceding paragraphs, do not consider that it would upset the balance of this existing relationship and cause harm to the WHS in the way objectors have claimed.

270. As such, 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. Although Officers conclude that the proposal would not harm the setting or the OUV of the WHS, for good practice, DCMS have been notified about the scheme (see paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention).

London View Management Framework (LVMF) Impacts

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

272. The site is located on the northeastern 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.

273. 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

274. 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 views from the north, the magnitude of change in these broad panoramas is considered negligible, with the site being almost fully occluded by other development. From views in the south, the proposed development would be more readily visible, though experienced as a smaller, more peripheral built element stepping down in height from the apex of the Cluster, and forming its northern peripheral boundary. In all viewing experiences, it would accord with the visual management guidance 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

275. Officers have assessed the extent of visibility of the proposed development in LVMF river prospect viewing experiences, both at pre-application and application stages. In views from the west, owing to the location of the site on the north eastern edge of the City Cluster, in the majority of these views, the proposed development would be fully occluded by tall buildings and other built development, which sit in-between the view point location and the site.

276. Views LVMF 15B.2 Waterloo Bridge (HTVIA View 2) and LVMF 16B Gabriels Wharf (HTVIA appendix view P) demonstrate that where the development would be visible, at considerable distance, through minor gaps in the Cluster, the level of viability would be inconsequential/minor and fleeting, where only a glimpse of the south eastern diagonal elevation would be registered. The magnitude of change in these broad viewing experiences is considered negligible, as the proposed development would be read, albeit in a limited number of places, as a background layer within the existing composition of the City Cluster – at great distance from the strategically important landmark/s in these views – resulting in no change to their overall composition. As such, the proposed development would not obscure or detract from any identified landmark element in these views and would give further context to those relevant Cluster landmarks identified in the SPG. 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 a landmark feature, in accordance with the visual management guidance SPG.

Summary of LVMF Impacts

277. There would be some minor enhancements to the London Panoramas through the proposal's consolidation of the northeastern edge 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.

278. 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.

279. 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

280. 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

281. 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).

282. It would be visible to minor degrees in the kinetic riparian sequences along the South Bank and from the Thames bridges, where its impact would be as described in the sections above on Waterloo Bridge and Gabriel's Wharf. The proposal would appear between existing Cluster towers or be screened by them and is located on the other side of the Cluster to the Cathedral. It would be a comparatively marginal presence in these views and would not affect the sky space between the Cluster and Cathedral or intrude into its backdrop.

283. The proposal would be concealed by towers along Bishopsgate, including No.88 and No.110, such that it would entirely occluded in views from Fleet Street and Ludgate Hill and the Golden gallery of the Cathedral.

284. 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

285. 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; 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

London Borough of Tower Hamlets:

286. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views. Two are of relevance here, first LBTH View 2 from the Wapping Wall bridge, and View 7 (towards ToL). The later corresponds with LVMF view 25A.1 and LSS View 10 – assessed at length above.

287. View 2 (HTVIA appendix view J) from the Wapping Wall bridge at the entrance to the Shadwell Basin provides a clear space over which the historic church spires of St Paul's Shadwell and St George in the East can be viewed. The City Cluster is visible to the west and left-hand side of the view, detached from the local context. In baseline and cumulative scenarios the proposed development would be visible beyond the buildings enclosing the basin, forming part of the northern periphery of the City Cluster, at a considerable distance to the south west of the churches identified in this view. While the proposals would mark a change in the composition of the view, with new built form being registered, it would wholly preserve the prominence of local designated landmarks and designated view 2, in accordance with LBTH Policy D.DH4.

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

289. The proposal's appearance in views from neighbouring boroughs has been considered, and assessment on the proposals impact in views of heritage assets is detailed below.

Historic City Landmarks and Skyline features:

290. The proposal would have the potential to affect views of historic City Landmarks and Skyline Features which, in accordance with CS13, should be protected and enhanced. These are addressed individually below:

Port of London Authority

291. The proposal would be visible in views of the former PLA building, forming part of a backdrop of tall buildings of the Cluster when seen from various points,

including the South Bank, Queens Walk Trinity Square, Tower Hill and from Tower Bridge. Officers consider that the proposal would read as a discreet edge component from the Cluster, clearly set apart from the PLA Building. While visible in relation to PLA, due to the considerable distance between the buildings, the proposed development would not conflict, compete or detract from the PLA Building's silhouette and its skyline presence would be preserved.

St Botolph of Aldgate

292. As a component of the Cluster's eastern edge, the proposal would be visible in views of this church looking west and there would be intervisibility between the proposal and the brick tower and obelisk spire (HTVIA View 17). At some visual distance with high levels of sky space intact in between, the proposal would rise to the base of the spire and form a modern element behind and to the south of the church when viewed from the junction of Minories and Aldgate High Street. The proposal would clearly be read as part of the modern Cluster seen in the backdrop to the church, rather than appearing overly close or domineering. As such, the church's skyline presence would be preserved in its entirety.

Tower Of London

293. The proposal would be visible in views from and of the WHS, which have been discussed in greater detail above. Within these views, it has been found that the visual impact of the proposal would be acceptable and for the reasons set out in the paragraphs above, it is considered that views of this Landmark are considered preserved.

Tower Bridge

294. The proposal would be visible in relation to Tower Bridge along the South Bank of the River, from Butler's Wharf (HTVIA View 7). From this location, the proposal would be seen forming the northern edge of the City cluster, to the north of the Bridge, appearing on the northern periphery of the cluster in this view, where there would be a high degree of visual separation with Tower Bridge. Views of this landmark outside the City are considered preserved.

All Hallows by the Tower

295. The proposal would be visible in relation to the spire of the Church of All Hallows by the tower in views across the river at Queens Walk (HTVIA Views 4-6) and from Tower Bridge. However, in no instance, due to the developments sites location to the north and the considerable distance between the two, would the proposal alter the ability to appreciate the skyline presence of the spire. The church's skyline presence would therefore be preserved in its entirety.

Royal Exchange

296. The proposal would be seen together with Royal Exchange (HTIVA View 3) but almost entirely screened by tall buildings to the north east, with the exception of a small portion of the south eastern elevation. However, in both the baseline and cumulative scenarios, officers consider this change to be minor and consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. Thus, the skyline presence of this City Landmark is considered preserved.

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

Conclusion on Strategic Views

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

299. In its north-eastern peripheral role in consolidating the Cluster, the proposal would be a minor enhancement of the composition and characteristics of LVMF London Panoramas.

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

301. 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.

302. 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

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

Direct and Indirect Impacts

Churchyard of St Augustine Papey (non-designated heritage asset)

Significance and contribution of setting

304. All churchyards in the City are considered to be non-designated heritage assets. The former churchyard of St Augustine Papey has been assessed against the criteria in Historic England's Advice Note 7 'Local Heritage Listing'.

305. The churchyard is of a significant asset type which provides a direct and tangible connection with past City communities as well as forming evidence for the extent of medieval piety within the City. The churchyard is of comparative rarity as one of a number of surviving ancient burial grounds in the City of London. It is of extraordinary age, first recorded in 1348.

306. The churchyard is of very clear and significant archaeological interest as likely harbouring an intact set of burials from the medieval period – possibly earlier – until the nineteenth century. In this it has deep historic interest, not just through this direct connection with past City communities, but also for its associations with two lost medieval churches, for which it now forms the only physical evidence in the townscape: St Augustine Papey, for which it was laid out, and St Martin Outwich, which acquired the churchyard after the Reformation, the former church being dissolved by and then demolished after the Reformation, and the latter church being demolished in 1874. It also possesses historical interest as one of a small number of burial grounds located on the City wall.

307. The churchyard derives minor architectural and artistic interest only from its ancient spatial dimensions (including its raised level) and lone, re-set tombstone; its lacklustre modern relandscaping being otherwise devoid of interest; this also results in limited landmark status, though churchyards are traditionally focal points of openness and respite in the street scene.

308. As such, it is considered that there is an opportunity for the enhancement of its architectural and artistic interest and landmark status and in so doing, enhancement of its group value with the extent collection of City churchyards, which have group value with one another; even when there is no specific intervisibility with others, there is a sense of group value as they are experienced by the pedestrian moving through the City.

309. The buildings in the setting of the churchyard are wholly modern and these make no contribution to its significance. However, a very important part of its setting is the churchyard's ancient relationship to Camomile Street and the wider street network. It is considered that there will be enhancement here, too, through reviving and better strengthening the spatial definition and aesthetic of the churchyard.

Impact

310. The proposals would involve the excavation and relandscaping of the churchyard and development within its setting; both direct and indirect impacts. The following assessment considers both the above-ground traits of the churchyard and impact upon its archaeology.

311. Historic England consider that the proposal would cause the total loss of the non-designated heritage asset. As set out in the following assessment, officers strongly disagree with this conclusion, which fails to recognise that the churchyard consists of two distinct components: its below-ground archaeology and its above-ground form, spatial delineation and ancient presence in the streetscape. While the former component would be removed by the proposals, the latter would not only remain but also have its legibility, appearance and accessibility enhanced.

312. The proposals would involve cantilevering over the churchyard at level 6. Floating, lightweight walkways and galleries would be located below this, though a triple height space would still be maintained above the churchyard. The significant distance above the churchyard of this cantilevering, together with the general sense of openness that it would create in relation to Camomile Street more generally, would ensure that the churchyard retains an openness and airiness; it would also gain a greater sense of seclusion and shelter, appropriate in view of the quality and character of churchyards as havens from the modern world.

313. Currently the level of the churchyard is raised above ground floor level, and the proposals would reduce its level to be flush with the street, framed and delineated by low masonry walls, its formerly raised level maintained and evoked by the two raised beds facing Camomile Street. This reduction in level would make the churchyard more accessible while preserving (and slightly regularising) its ancient footprint and extent; the distinctive angled profile to Camomile Street would be maintained. The low masonry walls would better define the extent of the churchyard and this would result in a low level of enhancement to its significance.

314. As set out in the section on archaeology below, the proposals would involve the excavation of the churchyard and so the complete loss of its archaeological component. This is discussed and assessed in more detail in the archaeology section below. Importantly, this impact would be mitigated through the use of conditions to extract the maximum possible learning, outreach and opportunities for interpretation from the discoveries therein.

315. Within the churchyard, the two raised beds facing Camomile Street would incorporate trees and other planting, while the rest of the space would incorporate seating and an artwork reflected in a striking plane of mirrored steel above. Details of all these features, and elements of historical interpretation would be secured via condition, but it is anticipated that the artwork would incorporate themes and motifs to reflect the churchyard's ancient history and function. In so doing, this would result in a low level of enhancement of the ability to appreciate the churchyard's significance, through the provision of much greater and more accessible historical interpretation and information.

316. In the north-east corner, the remains of the Roman and medieval City wall would be revealed and exposed to view, reinstating a visual connection between the churchyard and the wall and a very important part of its setting, albeit in a way which is new and clearly modern. Nevertheless, this would represent a low level of enhancement to the setting and significance of the churchyard.

317. The proposals would represent a striking and entirely sympathetic reimagining of this important non designated heritage asset, one that would, most importantly, enhance its relevance to the modern City by increasing its usability and accessibility and better revealing its significance.

318. The proposals would involve the removal of the archaeology, but this impact would be mitigated by the use of conditions to secure learning, outreach and recording and various enhancements to its significance through its relandscaping, stronger definition and reinstatement of its relationship with the Roman and medieval City wall.

319. NPPF para 216 requires that the effect of an application on the significance of a non-designated heritage asset be taken into account, with a balanced judgement required, having regard to the scale of any harm or loss and the significance of the heritage asset.

320. It is considered that the loss of the archaeology, would be mitigated in the customary way through conditions, and that overall there would be a moderate level of enhancement to the non-designated heritage asset, because the proposals would enhance its architectural and artistic interest through the new, more contextual landscaping treatment and its landmark status through the strengthening of its visual and spatial relationships with Camomile Street and the Roman wall SAM.

London Wall: remains of Roman wall and bastion, Camomile Street (Scheduled Ancient Monument (SAM))

Significance

321. The SAM is located beneath 63 St Mary Axe and comprises, as the scheduling record makes clear, a section of the Roman and medieval City wall and bastion. However, it is known from previous excavations that much of this section of the wall and bastion has been previously removed through excavation. Nevertheless, as a part of a defining feature of the City of London, of ancient Roman origins and incorporating medieval fabric, the monument is of outstanding architectural, historic and archaeological interest.

Setting

322. The SAM at present is completely concealed within the basements of the existing building on the site, as though hermetically sealed off from the rest of the City; it therefore presently draws no contribution to its significance from its setting, nor is it visible at all for its significance to be in any way appreciated.

323. There is a clear opportunity for a redevelopment of this site to remedy and enhance this situation. The SAM was erected as a highly conspicuous and defining feature of the City's urban structure and would have had a clear relationship with various buildings, streets and spaces – most pertinently the streets immediately adjoining the site and the burial ground since it was founded – over the centuries of its above-ground existence. There is a clear opportunity to re-establish at least some of these ancient relationships.

Impact

324. The proposals would involve direct works to the SAM and indirect impacts on its setting: the revelation, conservation and public display of the wall in-situ. As the precise nature and extent of the wall, its state of preservation/conservation and general condition are unknown, these aspects of the proposals will be developed in detail through the use of conditions at the appropriate stages of the demolition and construction process.

325. Historic England consider that harm could directly be caused by exposing the wall to the wider environment, though this harm could be 'adequately limited' through appropriate conservation, suitable environmental controls and ongoing management; they consider that in these circumstances the significance of the monument could be enhanced. Officers concur that the revealing of the wall, suitably conserving it and creating a stable environment in which it may be viewed and appreciated would be an enhancement.

326. Historic England further perceive that the scheme would result in the 'complete removal' of the churchyard and that this would cause harm to the setting of the SAM. For the reasons set out above in the section on the churchyard, officers disagree with this conclusion, failing as it does to acknowledge that overall the churchyard would be enhanced.

327. Officers further consider that the proposals would revive the ancient visual relationship between the SAM and the churchyard – albeit in a new and clearly modern way – and that, in turn, each would enhance the setting of the other. This would represent a low level of enhancement to the setting and significance of the SAM.

328. Overall, subject to the conditions set out below, the proposals would preserve, and result in an overall low level of enhancement to, the setting and significance of the SAM.

Indirect impacts

38 St Mary Axe (The Baltic Exchange): Grade II

Significance

329. The Baltic Exchange has historic interest as an inter-war office building (1922) in the City designed by noted British architect Sir Edwin Cooper. This stone-faced building of four storeys with two additional attic storeys illustrates an important phase of office development in the City, characterised by grand, classically enriched stone facades and Classical proportions to St Mary Axe, with a plainer stone elevation to Bury Court.

330. Architectural and artistic interest derives from an appreciation of the Classical style and ornamentation of the building, including a Doric entablature at the ground floor and an enriched frieze and dentil cornice at the fourth floor.

Setting

331. The setting of the listed building is defined by its prominent corner location, addressing both St Mary Axe and Bury Court. Its immediate setting includes office buildings of similar scale, adjacent to the north and to the west side of St Mary Axe, of a later date that make a neutral contribution to the setting of the listed building, as well as significantly larger and taller modern commercial buildings in contrasting materials and architectural styles.

332. Due to its location in the City Cluster, the setting of the listed building is mainly characterised by large-scale, tall modern commercial buildings that make a neutral contribution to the asset's significance. These include 30 St Mary Axe, directly to the south of the asset, but also the Aviva Tower and 22 Bishopsgate, to the south-east. Additional tall buildings in the visible setting include 70 St Mary Axe to the north, as well as 90 Houndsditch and 100 Bishopsgate to the north-west.

Impact

333. In views looking north-west from Bury Street the proposed building would be highly visible above the listed building. However, the background of the listed building is at presently characterised by the distinct presence and visibility of both 100 and 110 Bishopsgate towers. In views north along St Mary Axe the proposed building would be highly prominent, infilling a sky gap between 70 St Mary Axe and 100 Bishopsgate.

334. Although of a closer proximity and prominence, the proposed development would be consistent with the much-altered setting of the listed building which is characterised by tall, modern development. As such, the listed building would not be impacted by the proposed development, which would preserve the setting and significance of the listed building and the ability to appreciate it.

Church of St Helen Bishopsgate (Grade I)

Significance

335. The Church of St. Helen's at Bishopsgate (Grade I) is a rare survival of a medieval building in the City of London. Uniquely, it combines a nunnery church and a parish church side by side. The Church dates back to a Benedictine priory for nuns which was founded in 1210. While most of the outer structure dates from the 13th century, there are elements from the 12th, 14th, 15th, and 16th centuries. The church is of outstanding architectural, historic and archaeological significance. It is one of the City's few surviving pre-Fire buildings.

336. It is built of partly rendered rubble, brick and ashlar. In 1992 and 1993 IRA bombs caused damage to the church. Despite some reordering of the interior, many internal fixtures and decorative elements installed in the 15th to 19th centuries have survived and contribute to the building's historic interest and significance.

Setting

337. The churchyard to the west contributes positively to the significance of the listed building. From the west, the church's immediate setting comprises a group of 19th and 20th century buildings, with the tall buildings of the City Cluster providing a long-established, dramatic contrast in scale and materiality immediately to the south and west. The Gherkin is prominent behind the church in views looking east. There is a narrow slice of clear sky above the church between the Gherkin and No. 1 Undershaft obscured by a prominent tree in the churchyard.

338. Due to its location within the City Cluster, the setting of the church has changed considerably over the last 50 years. There is a pronounced contrast between St Helen's Church and the modern tall buildings of the City's Eastern Cluster, which lie in close proximity to the church. This includes the St Helen's Tower (formerly Aviva), the Leadenhall Building, 30 St Mary Axe, Tower 42, 100 Bishopsgate and 22 Bishopsgate, to the north and south. The setting of the church today is characterised by these long-established contrasting modern buildings that characterise this part of the City of London townscape. The juxtaposition between the historic church and the surrounding tall commercial buildings emphasises the venerable historic character of the church, albeit in a way unrelated to heritage significance and setting.

Impact

339. The GLA has identified a very low, less than substantial degree of indirect harm to the setting of the Church of St Helen's.

340. In HTVI view 22, looking north-east to the church from Great St Helen's, a segment of the proposed building would appear layered behind the mid-rise and modern rear façade of the St Helen's Place buildings and behind and to the side of the existing 100 Bishopsgate Tower. The view, and church setting here is framed to the south by the tall and assertive presence of the Gherkin - 30 St Mary Axe. Views of the proposal would be partially occluded by the churchyard trees when in leaf but would have greater visibility in winter months. The setting of the church in this view is predominantly of much taller,

modern forms and the proposed building would be an augmentation of this. As such, officers disagree with the GLA's position and conclude that the elements of the setting that contribute to the significance of the listed building would not be negatively affected by the proposed development. The proposed development is therefore not considered to harm the setting nor the significance of St Helen Bishopsgate.

46 Bishopsgate (Grade II) and 48 Bishopsgate (Grade II)

Significance

341. 46 Bishopsgate is a 5-storey mid-18th century narrow-fronted townhouse, refaced in the 19th century and with timber shopfront. Notable historic interior elements survive. Its significance lies in its rarity of age and typology along Bishopsgate which has since undergone huge evolution in building styles, types and ages.

342. 48 Bishopsgate, adjoining to the north is a stone-faced, highly ornate late-19th century purpose built commercial building. The building is architecturally significant for its rich façade, standing as a flamboyant, yet relatively small-scale example of the Second Empire architectural style.

Setting

343. Both buildings sit within a row of greatly contrasting built elements. 42-44 to the south is a 6-storey mid-20th century concrete tile and mirrored glass faced office development. To the north is a small scale c19th century infill building, which complements no. 46 in scale, style and materials. Adjoining further north is the vast classical-styled Portland stone expanse of Hasilwood House. Framing the row is a context of tall modern buildings in both the foreground and background and wider setting. These include 22 and 100 Bishopsgate either side, with Tower 42 and 99 Bishopsgate also providing a visible presence. As such, the existing setting is considered to be characterised by both the buildings' component nature as part of this row of contrasting building facades, and by the presence of very tall modern development. As part of this townscape group, the contribution of setting to the appreciation of significance of the listed buildings is limited to a neutral degree. Furthermore, the existing site building is not visible and does not contribute to the setting at present.

Impact

344. The proposed development would have limited visibility in the backdrop of 46 and 48 Bishopsgate, visible only when looking north up Bishopsgate from the junction with Threadneedle Street. Here a segment of the proposal would appear above the listed buildings in between the flanks of 22 and 100 Bishopsgate, before quickly disappearing when moving in any direction. The proposal would not affect the composition of the row of which the listed buildings form part and would accord with the component of character relating to the presence of tall buildings. The proposal would not occlude views of the listed buildings at any point. In conclusion, there would be no harm to the setting or significance of the listed buildings, preserving the extent to which setting contributes to an appreciation of their significance.

Bishopsgate Institute and Library (Grade II)*

Significance

345. The building provides a prominent and distinctive frontage onto Bishopsgate with twin turrets faced in highly decorative buff terracotta. The remainder of the building sits behind the adjoining buildings with a red brick and terracotta trim side elevation and secondary entrances along Brushfield Street and Fort Street. Completed in 1895 by Charles Harrison Townsend, the building retains rarity value as a more unusual typology within the city, through its civic and educational function. The use of free gothic elements and terracotta detailing are typically eclectic, making a high-quality example of turn of the century design. The building has high architectural and historic significance.

Setting

346. The building derives a degree of significance from its setting on the south side of Brushfield Street, where it forms a group with two eighteenth century grade II listed buildings, and from its street frontage along Bishopsgate, where in close to mid-range views the building's turrets and ornate frontage are best appreciated. In longer range views from the north the institute is experienced obliquely, with the turrets of the main frontage almost entirely backdropped by tall buildings within the City cluster. The existing buildings on the development site are not visible from or with the listed building and therefore make no contribution to setting.

Impact

347. In views looking southward along Bishopsgate the proposed building would be visible some distance away adding to and complementing the established backdrop of the City Cluster. In views looking south along Bishopsgate. The Institute turrets are currently backdropped by other tall buildings such that the proposed building would not interfere with views of the turrets against open sky. The proposal is considered to preserve the overall character of the view, and the extent to which it contributes to the building's significance. It is noted that more immediate views of the Institute, which best reveal the building's prominence on the street front, and group value with neighbouring buildings would be preserved.

348. In conclusion, there would be no harm to the setting or significance of the listed building, preserving the extent to which setting contributes to an appreciation of its significance.

10 Brushfield Street (Grade II) and 14 Brushfield Street (Grade II)

Significance

349. The listed buildings at 10 and 14 Brushfield Street, both have historic and architectural interest as late 18th century townhouses with stock brick symmetrical facades and timber shopfronts and sash windows at the upper floors.

Setting

350. The buildings derive a degree of significance from their setting. The development which surrounds the listed buildings is mixed in terms of age,

style and scale. Both buildings form part of a terrace (nos. 8 to 14) on the southern side of Brushfield Street, with buildings of similar style and appearance. The unlisted buildings of this terrace at nos. 8 and 12 make a positive contribution to the setting of these listed buildings.

351. Modern development in the immediate setting of the assets include the 11-storey building at 250 Bishopsgate, to the north of Brushfield Street. This development does not contribute to the significance of the assets.

352. The wider setting of the listed buildings includes the presence of tall buildings in the City Cluster, partly visible in views of the assets looking from the north to the south-west. These buildings do not contribute to the significance of the assets. There is currently no intervisibility between the existing building on the application site and the listed buildings on Brushfield Street.

Impact

353. The proposed development would be partially visible in some views of the assets, when looking south towards the Cluster. When visible, the proposed development would align with the existing character of these views, which already include tall modern buildings. The immediate short-range views along Brushfield Street where the listed buildings are mainly appreciated would not be negatively affected by the proposed development. The relationship of the assets with the elements of their setting that contribute positively to their significance would be retained. The proposals would preserve the setting and significance of the listed buildings and the ability to appreciate them.

Devonshire Square group including: Port of London Authority's Warehouses and boundary Walls to Middlesex Street and New Street (Grade II);12 and 13 Devonshire Square Grade (II); Pair of houses north of entrance to Port of London Authority's Warehouses (Grade II); House to east of entrance to Port of London Authority's Warehouses (Grade II);Gatepiers at entrance to Port of London Authority's warehouses (Grade II)

Significance

354. This group is centred around the late 18th century Port of London Authority warehouse buildings surrounding a now-enclosed central courtyard space and including listed gate piers. The listed houses surrounding the warehouses are four-storey terraced townhouse type, all constructed of stock brick. Significance of the warehouse complex is considered to derive from it being an extensive yet rare example of 18th century purpose-built warehousing within the City, although much altered internally preserving distinctive built forms and facades. It has historic significance with its links to the shipping industry and the East India Company. The warehouse interiors have been much altered following conversion to office space in the late-1970s. The houses are all surviving examples of flat-fronted18th century City townhouses, typical of the Georgian style, and rare within this portion of the City. Devonshire Square itself is the name of the space to the south of the warehouses and contains Grade II Listed nos 12 and 13 on its north side, which are significant as examples of remaining Georgian townhouses with well-preserved facades.

Setting

355. This group of grade II listed buildings is located approximately 90m north of Devonshire Square and derives a moderate degree of significance from their setting. The warehouse complex itself is irregular in plan, partly formed around a large central courtyard which was enclosed by a roof in 2006. Other external courtyards exist to the north of the main warehouse building, covered with flagstones and tree planting, and allowing views and appreciation of the altered, but distinctive brick faced warehouse facades. The spatial arrangement of the warehouses seen together with the enclosed, and now landscaped open spaces surrounding them, allow an appreciation of the buildings' scale, forms and historic purpose as part of London's port and trading history. The entrance townhouses form a characterful and historic framing and lead into the warehouse grounds, contributing positively to the setting of the warehousing. The redeveloped warehouse complex includes smoked glass and marble clad 1970s office blocks in direct proximity to the historic facades of the original warehouse structures. These are of a larger massing, height and contrasting architectural style to the historic elements and are not considered to make a positive contribution to setting. Tall modern office development is a feature of the wider setting of all these listed buildings and forms an intrinsic part of its current day setting. The existing building on the proposal site is not visible and does not contribute to the setting of the group.

Impact

356. The proposed development would be visible in views looking south across Devonshire Square, and although not visible in views northwards towards nos 12 and 13, would be a prominent addition to the wider setting. The setting of nos 12 and 13 within the square is currently characterised by the visibility of the tall modern towers of the City Cluster, including 55 Houndsditch in close proximity as well as 100 Bishopsgate, 30 St Mary Axe and elements of a number of other towers. As such the addition of the proposal would accord with this wider context of modern towers and would not change the character of the setting beyond that of the existing. Likewise, the visibility of the proposal from the northern courtyards and outside the entrance houses and gate piers would not result in a change to the existing setting where the distinct presence of tall, modern buildings is characteristic.

357. The relationship of the assets with the elements of their setting that contribute positively to their significance would not be altered. The proposal would preserve the setting and significance of the listed buildings and the ability to appreciate them.

Bevis Marks Synagogue (Grade I)

Significance

358. Synagogue of 1699-1701 by Joseph Avis. This is the oldest Synagogue in the country and survives to a remarkably little-altered degree. Avis had links to Wren's office and, architecturally, the building reflects the simple vernacular of some contemporaneous City churches and nonconformist chapels. Of a simple, rectangular plan form with simple red brick and Portland stone elevations with a pitched, slated roof behind a plain parapet. The principal, west elevation is symmetrically composed around the centred, main entrance

door, flanked by two tiers of windows which run around the building, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense urban location. Above the entrance door is a tablet with the Synagogue's name etched in Hebrew: 'The Gate of Heaven/Sky'.

359. The interior is a single, double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers. The plan form, fixtures and fittings are largely of 1701, barring some minor later additions such as early C20 electric lighting. This place plays host to the religious traditions of the Sephardi Jewish community in Britain, known as minhag. Whilst practice here shares common worship and liturgical practice with other Jewish communities, for example reading from the Torah, there are particular rituals unique to this Synagogue (the mitzvot), such as the use of specific sung melodies by the Hazan in the reading of the Torah, which have been passed from generation to generation of the Synagogue's community.

360. It is a rich and intricate manner of worship, which cannot be experienced anywhere else, in a building of great age and rarity in a national context. Accordingly, this very old and rare intangible inheritance is considered to be of exceptional historical and communal interest; the building is of outstanding architectural, artistic and historic interest.

Setting

361. The building retains its original setting, albeit with more recent buildings on some of the surrounding plots, located in an undemonstrative, off-street location in a private courtyard. It has no direct street presence except its south-east elevation to Heneage Lane, a quintessential city alley, on which the Synagogue manifests as a plain brick elevation pierced with three prominent, round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the former Vestry and Beadle's House fronting the north side of Heneage Lane and seen obliquely from Bevis Marks.

362. The inspector who reported on the Tulip proposal stated (at paragraph 14.52 of his report, with which the Secretary of State agreed): "Bevis Marks Synagogue (Grade I) is listed largely for its age, rarity and internal features. This does not mean that its setting is necessarily unimportant, but in this case it is largely limited to what can be experienced from within its courtyard."

363. Otherwise, the principal approach to the Synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, consisting of two narrow rectangles of paved area flanking the Synagogue's northeast and north-west elevations. Within the tight confines of this space, the Synagogue is a massive, commanding presence. The courtyard acts as an extension of the Synagogue, a place where people can gather before and after services (and indeed the last place males and females can interact before entering for worship). There have been recent alterations to the courtyard including the construction of a ramp and steps to the new museum in the western arm and two booths, for ticketing and security, inside

the entrance and in the eastern arm. Seen from the courtyard, the Synagogue is hemmed in by other buildings of a similar historic scale and mostly of the same brickwork materiality, including the former Vestry and Beadle's House which directly adjoins it to the east. There is a specific sense of an architecturally reserved and deliberately secluded setting.

364. Bevis Marks was the first purpose-built Synagogue in Britain following the formal resettlement of the Jewish community after centuries of exclusion. Its discreet, secluded setting is considered to be powerfully representative of this, making a strong contribution to the building's significance; the importance of the relationship between the Synagogue, its courtyard, Heneage Lane and Bevis Marks cannot be overstated. Consequently, it is proposed that these elements of setting form part of a bespoke Immediate Setting policy area in the City Plan 2040 to recognise and help preserve these qualities. For clarity, the application site is not within this proposed Immediate Setting policy area.

365. The sense of privacy, seclusion and reservation, coupled with the tight urban grain of this area of setting, means that the Synagogue is experienced through a series of informal vistas and closeups, rather than formally recognised views.

Impact

366. The proposal would just be glimpsed from the courtyard, with the viewer looking away from the Synagogue, in a way which would be clearly marginal and thoroughly disassociated from the Synagogue. As such the significance and contribution of setting of this important heritage asset would be preserved.

Church of St Andrew Undershaft (Grade I) and Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II)

Significance

367. The Church of St Andrew Undershaft is located at the intersection of Leadenhall Street and St Mary Axe, to the south-east of the site. A rare survival, dating to the 12th century, rebuilt in the 16th century, of squared rubble and stone incorporating an 15th century tower with a polygonal stair turret, which is partially rendered. Inside, there are several notable monuments and fittings.

368. Similarly to the Church of St Helen, the church is of very high historic interest as a rare medieval church that survived the Great Fire of London and the Second World War. Damage from an IRA bombing in 1992 resulted in the loss of its remaining 16th-century windows.

369. Architectural interest survives from the appreciation of its medieval architectural style and materials including the distinctive silhouette of the tower. It is a fine example of its kind and a particularly good, and now rare, example of a City church that predates the Great Fire.

Setting

370. St Andew Undershaft is located at the southern end of St Mary Axe, just before it meets Leadenhall Street. Both streets are historic and originally developed on all sides – Leadenhall, an ancient route connecting Cornhill to Aldgate and St Mary Axe reflecting part of the City's medieval layout.

371. The setting of the Church was originally densely developed and has changed dramatically over the years, with the most drastic changes in the 20th century. It is now characterised in the main by modern, tall commercial developments which make a neutral contribution to its significance.

372. The small surviving churchyard to the north, including its walls and railings, make a strong contribution to the building's setting and significance. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset's significance.

373. Modern office buildings and tall towers of the City Cluster, such as the Leadenhall Building, 30 St Mary Axe, 52 Lime Street, and 40 Leadenhall Street are some of the tall buildings in the immediate vicinity of the Church. The relationship of the asset and 30 St Mary Axe which is visible directly behind of the Church tower in views from Leadenhall Street has become an iconic and frequently photographed one, joined recently (in the cumulative scenario) by the form of 100 Leadenhall Street directly to the east of the church. Apart from the juxtaposition in terms of height, the contrast of the design and materiality of these buildings add further interest to this view, amplifying the historic character of the masonry church, albeit in a way unrelated to heritage significance, setting and provide a focused appreciation of it.

Impact

374. The GLA has identified a low level, less than substantial degree of indirect harm to the setting of the Church of St Andrew Undershaft.

375. In HTVIA view 21 the proposed building would appear prominently in views north along St Mary Axe, although at some considerable distance behind 30 St Mary Axe and above the existing mid-rise buildings as the street curves to the right. In the cumulative scenario, which includes both One Undershaft and 100 Leadenhall Street, a much smaller segment of the proposal would be visible, tapering down acutely above St Mary Axe and towards the Church.

376. As with St Helen's, the church is already seen in dynamic contrast to the taller buildings of the City Cluster. Officers therefore do not agree with the observations of the GLA.

377. While visible, the proposals preserve views towards the church tower across the Lime Street to Leadenhall Street junction and from the immediate locality. Similarly, the proposal is considered in keeping with the existing backdrop character within these views, and its tapering allows an element of sky view to remain in mid-range views.

378. Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church's setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it. The proposal would form another addition to the highly distinctive setting of modern high-rise buildings which both surround and frame the church, and its contrasting medieval character and presence would not be harmed.

Lloyd's Building (Grade I and Grade II)

Significance

379. The Lloyd's Building, designed by Richard Rogers Partnership (RRP) with engineers Ove Arup and Partners is a purpose-built office tower opened in 1986 and Grade I Listed in 2011. The original stone façade, designed by Sir Edwin Cooper between 1925-1928 and previously listed at Grade II in 1977 was integrated into the RRP building's design in the 1980s redevelopment.

380. 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).

381. 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 elements contribute to a bold aesthetic.

382. 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. 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

383. Such is its architectural singularity that the significance of Lloyd's relies very little on its setting, other than as a point of contrast. Tall commercial buildings define its immediate context, 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.

384. The existing buildings on the application site make no contribution to the significance of the Lloyd's Building, with no intervisibility between the two.

Impact

385. The proposed building would be seen as a new skyline element in the background and to the west of 30 St Mary Axe when viewed north along Lime Street. It would appear as a complementary, although relatively distant, new addition to the existing cluster of towers which currently create the setting of the listed building.

386. Dramatic contrasts in scale, and between old and new are characteristic of the Lloyd's Building's setting. The relationship and juxtaposition of the Lloyd's Building with both historic and modern buildings that contribute to its significance would remain unaffected. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

13 Bishopsgate (Grade I)

Significance

387. Westminster Bank, 13 Bishopsgate, was completed in 1865, and designed by J Gibson. The building was constructed as the new head of office by the direction of the National Provincial Bank of England. The Bank is constructed in Portland stone in a Neo-Classical style with arched windows and Corinthian columns.

388. The building derives a high degree of historic interest as a mid-19th century purpose-built headquarters of a national bank. Commercial development of this period in this area of the City was defined by the design and use of buildings for banking and associated commercial activities. It also derives historic interest for its association with a prominent 19th century architect, John Gibson, who worked with Sir Charles Barry on the Houses of Parliament. The bank draws a very high degree of architectural interest from its principal elevations that present a rich Neo-Classical façade with figures in high relief to Bishopsgate. Architectural and historic interest is also derived from the townscape group value of the Grade II listed buildings directly to the south which includes British Linen Bank, nos 37 and 38 Threadneedle Street, which are also fine examples of classical Portland stone buildings from the early 1900s.

Setting

389. The immediate setting of Westminster Bank is the junction of Threadneedle Street and Bishopsgate. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the historic heritage value of the Bank. The development which surrounds the heritage asset is mixed with Victorian,

Edwardian and inter-war buildings as well as modern tall buildings that show the historic evolution of this area of the City.

390. Overall, it is considered that the existing setting makes a neutral contribution to the understanding of the receptor's heritage value, in the way the building responds to the curvature of the street and creates a strong neoclassical group with the listed buildings to the south. There is currently no intervisibility with the application site, and as such, it makes no contribution to the setting of the heritage asset.

Impact

391. The GLA has observed a very low level of less than substantial harm to the indirect setting of the Bank group of buildings, to which 13 Bishopsgate has been assigned. City Officers disagree with this assessment, noting that very limited glimpses of the proposed building would be possible in views looking north from the corner of Threadneedle Street and Bishopsgate, with the proposal appearing only behind the tall flanks of 22 Bishopsgate and 100 Bishopsgate, and at greater distance. Equally, given this existing character context of tall, modern buildings, together with the limited intervisibility to the proposal, the development is not considered to harm the significance, appreciation nor setting of the heritage asset.

Church of All Hallows, London Wall (Grade I)

Significance

392. The church was designed by George Dance the Younger, built in 1765-7 to replace a medieval church built up against the City wall. While the church's exterior is generally restrained, it features an ornate west tower that culminates in a circular cupola. The visual prominence of the tower, which is generally of small scale, is accentuating by the use of contrasting Portland stone to the stock brick of the main part of the church. The interior is particularly noteworthy and had a later influence on Dance's pupil, Sir John Soane.

393. The church has great historic and architectural interest as an 18th-century place of worship designed by George Dance the Younger. The unconventional aisleless floorplan of the church, its prominent tower made of Portland stone, and the grand arcade on its southern façade contribute to the significance of the Church. The church also holds additional historic and archaeological interest deriving from the foundations and remains of the Roman London Wall that it incorporates. The interior is of interest and further contributes to the significance of the church.

394. An above-ground section of the medieval London Wall acts as the western boundary of the churchyard, and this segment is designated as a Scheduled Monument.

395. An above-ground section of the medieval London Wall acts as the western boundary of the churchyard, and this segment is designated as a Scheduled Monument.

Setting

396. The church is located on London Wall, a busy City thoroughfare, to the west of the proposed development site. Its setting is defined by its location sitting alongside the road, rather than facing onto it. Set within dense urban surroundings, and appearing as a relatively small-scale building in comparison to those neighbouring. The location of the church by the foundations of the Roman London Wall upon which it stands makes a significant contribution to its significance. The small Churchyard, to the west of the Church is also an important and positive element of its setting. Tall buildings within the Cluster form part of the setting of the church appearing as a highly distinctive backdrop in views from the west. These include 100 and 110 Bishopsgate which form the backdrop in views of the Church from London Wall looking east. These tall buildings, as well as the existing modern development on the application site, do not contribute to the significance of the Church.

Impact

397. The proposed development would have partial visibility in the backdrop of the church when looking east along London Wall towards the City Cluster. The proposal would appear in the current gap existing between 100 and 110 Bishopsgate, but at a significantly lower height and presence than either of those tower masses. A cumulative scenario would see visibility of the proposal reduced still further through the consented schemes of 55 Old Broad Street and 99 Bishopsgate appearing in the foreground.

398. Given the much-altered context of the Church and the presence of tall buildings in and around the site that already characterise views of the church and its tower, it is not considered that the proposed development would affect the prominence of the church or diminish further its ability to act as a focal point along London Wall. The development would be seen as an addition to the existing and emerging tall building context along Bishopsgate and Wormwood Street which at present make a neutral contribution to this asset. Whilst the proposed development would have a moderate degree of visibility, it would be consistent with existing tall development within the setting of the church, which is characteristic of this part of the City and is not a new element or disruptive feature out of context. In terms of its height and scale but also its architecture and materiality, officers consider that it would not act to detract from the Church of All Hallows and its prominence. As such, officers do not consider that the proposal would adversely affect any elements of the setting that make a positive contribution to the church. The proposed development, in both baseline and cumulative scenarios, would not affect the ability to understand or appreciate the Church and would preserve its significance and the contribution of setting.

Royal Exchange (Grade I)

Significance

399. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite, the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. It replaces three royal exchanges previously built on the site and is symbolic as symbolising the centre of commerce for the City of London.

400. It is of exceptional historic and architectural interest as "the greatest of the City's 19th century exchanges" and remains as the only survivor. Its exceptional architectural composition, prominent site location and historical association all suggest a public role. It is historically symbolic as the centre of the commercial life of the City and the financial role of the surrounding development.

Setting

401. The setting of the listed building comprises the grand Cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail and contributes to an understanding of the former function in this financial district of the City. In HTVIA View 3 the Royal Exchange appears centrally within this composition, drawing the eye towards its grand porticoed frontage. Views east from the junction take in the tall buildings of the City Cluster seen in the backdrop. The contrasting architectural languages of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building's setting.

Impact

402. The proposal would be partially visible in the backdrop of the Royal Exchange in views east from Bank Junction, looking up Threadneedle Street, as shown in HTVIA view 3. The tapered edge of the proposed building would drop down across the Threadneedle Street Gap, appearing as a more distant layer with Tower 42 and 100 Bishopsgate sitting as closer layers.

403. The minor intervisibility with the building in this way would not affect the value of the heritage asset and only serve to reinforce these positive juxtapositions between the Royal Exchange and the commercial centre of the Cluster. As such the proposals would appear consistent with the existing tall building backdrop setting and would reinforce this part of the townscape character. Officers consider that while visible in part, the proposals would not diminish an appreciation of the listed building's silhouette or decorative detail. It is considered there would be no harm to the significance of this listed building or to its setting in both baseline and cumulative scenarios.

Finsbury Circus Registered Historic Park and Garden (Grade II)

Significance

404. The Finsbury Circus Registered Historic Park and Garden sits at the centre of the Finsbury Circus Conservation Area. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The

significance of the Garden together with the Conservation Area as a group is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus.

Setting

405. The Registered Historic Park and Garden is bounded by the significant buildings which sit around the oval shaped garden, with London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon Street to the north. The residential towers of the Barbican are visible to the west of the Gardens, with other, contemporary, taller buildings visible with in its immediate setting particularly to the south and east. Owing to the imposing buildings containing this tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited. Tall buildings set beyond the gardens within the City Cluster are a characteristic of the wider surrounding vicinity in which the asset is situated.

Impact

406. The circus gardens contain mature trees and long-range views across the space are limited when there is leaf cover. Without leaf cover, a narrow segment of the proposed development would be visible in a skyline gap when appreciated in some views across the garden looking east, appearing behind the 100 and 110 Bishopsgate towers as shown in HTVIA view 24. The addition of the building, as a distant background element in these views is in keeping with the established height and massing of the commercial centre of the City Cluster and does not challenge an appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Registered Historic Park and Garden. The proposal would add to the varied Cluster of tall buildings which are clearly distinct from this historic space.

407. The proposed building would not result in harm to the setting or significance of the Finsbury Circus Registered Historic Park and Garden.

Former Port of London Authority (10 Trinity Square) (Grade II)*

Significance

408. The Former Port of London Authority Building (Grade II*) was built 1912–22, designed by Sir Edwin Cooper. This Portland stone landmark building is in the Beaux Arts classical style and features a richly embellished tower. Its significance lies in its architecture and historic Port of London civic function and to a lesser degree its setting. It is of a high level of architectural, historic and artistic significance.

Setting

409. The setting of the listed building comprises open space to the foreground with Trinity Square Gardens and the Tower Hill War Memorial for Mercantile Marines, which contribute positively to its significance. The adjacent buildings

within its immediate setting are also constructed in Portland stone helping to form a small group of classical styled traditional buildings of a similar scale.

410. In the wider setting there is a broad range of buildings in terms of period, style, height and materiality. The building forms part of the setting of the Tower of London. The broad tower of the Former Port of London Authority is embellished with order of Corinthian pilasters, arched niche and colossal figure sculpture (Old Father Thames) is a clearly identifiable landmark feature in river prospect views. In longer north-westerly views the building's backdrop is dominated by the tall towers of the City Cluster.

Impact

411. View 16 of the HTVIA shows the proposed development in the context of the Former Port of London Authority Building. Visibility of the proposal is limited, with a small segment of the top appearing in the distance above the mid-rise foreground mass of 10 Pepys Street. The proposal would adjoin the edge of the City Cluster group, sitting at a height and presence which complements the cluster's ascending form.

412. The contemporary architecture and form of the proposed development would align it with the existing modern towers. Given the limited visibility, distance and separation from the listed building's silhouette the proposal is not considered to harm the appreciation of its form and facade. This would ensure that the distinctive architectural qualities and presence of the asset when compared to the Cluster buildings would retain its existing prominence in these views. As such, the proposal is considered to fully preserve the setting and significance of the listed building and the ability to appreciate it.

Tower Bridge (Grade I)

Significance

413. Tower Bridge was designed by the by the architect Sir Horace Jones, for the City of London Corporation in 1894 with engineering by Sir John Wolfe Barry. It represents a triumph of Victorian engineering as a low, hybrid suspension and bascule bridge with a steel frame, clothed in revivalist French gothic towers, turrets 283 and pinnacles. The dramatic symmetrical composition acts as a 'portal' to central London from the River and has become an iconic and internationally recognised landmark of London.

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

Setting

415. There are a number of elements which are considered to make important contributions to the significance and appreciation of Tower Bridge as a heritage asset.

416. The broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen's Walk, the North Bank and Butler's Wharf allow the bridge to be seen for its commanding, strategic siting, architecture and silhouette. In these views the bridge stands sentinel, guarding the entrance to historic London from the sea and as both a City, London and even nationally important landmark.

417. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360-degree panoramic context with those other defining landmarks and features of the historic London Pool, including City Hall, the Tower of London, the Monument, St Paul's Cathedral, Old Billingsgate and the London Custom House. In addition to those, the remains of the quays, wharfs and warehouses of the historic Pool contribute to a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of Tower Bridge.

418. The local and wider townscape views and approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the Tower of London, from main vista at 'More London' on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul's), where the strategic role of the Pool of London is announced by its towering and dramatic architectural form and silhouette. These also make an important contribution to significance and an appreciation of it.

419. The existing setting of Tower Bridge is also highly influenced and characterised by the presence of tall buildings, including those of the existing City Cluster in views from the south but also the likes of the Shard and Guys Hospital in views from the north bank westwards from St Katherine's Dock. This contribution of tall buildings builds the appreciation of the bridge as an iconic structure that is a constituent part of a modern and evolving metropolis.

Impact

420. The proposed development would be visible, seen from and in the backdrop of the bridge from the south-east, from Butlers' Wharf in HTVIA view 7 with occasional glimpses along the Queens Walk adjacent to the former City Hall shown in views 5 and 6. In these views the proposed building would be seen as a high-quality architectural addition, experienced as a subservient element of the established City Cluster of modern towers to the north of the bridge, according with the height build up and massing of the cluster formation. In all views the tower would remain the commanding foreground landmark guarding the Pool of London. While partly visible in the backdrop, the overall

contribution of setting to an appreciation of the listed building's significance is considered to be preserved within its setting.

421. In both the baseline and cumulative scenarios, the proposal would not change the existing composition of the views, nor the visual focus in the view; it would read, like the rest of the Cluster to the north of the bridge, as disassociated from the heritage asset but according with the existing character and makeup of its setting. The proposed development would preserve and not harm those elements of setting identified above and as such the significance of the listed building and the appreciation of it.

Conservation Areas

Bishopsgate Conservation Area

Significance

422. Bishopsgate Conservation Area was designated in 2007 and included the former Middlesex Street Conservation Area, designated in 1981. The Conservation Area is located to the north of the development site. The Conservation Area extends from Wormwood Street on its southern boundary, to Brushfield Street in the north. Bishopsgate was originally a Roman route travelling north out of the City.

423. The heritage value of the Conservation Area is defined by its staggered, more piecemeal redevelopment that occurred in the 19th and 20th centuries. This is in contrast to other areas of the City, which saw dramatic and transformative commercial development. This, combined with the Conservation Area's variety of uses (industrial, residential, commercial and transport) has led to a diverse character. The historic street layout and orientation of alleyways and squares is still visible, despite few houses remaining from this period. A significant townscape feature within the Conservation Area is Liverpool Street Station.

Setting

424. The immediate setting of the Conservation Area is much changed with the recent expansion of the Eastern Cluster and large complexes such as the Broadgate Estate. The southerly setting of the Conservation Area is dominated by tall modern buildings at the northern edge of the City's Eastern Cluster including Dashwood House and the Heron Tower.

Impact

425. The Bishopsgate Conservation Area is located in the heart of the Square Mile's commercial district. The area is well contained with a collection of historic Victorian and Edwardian buildings which sit beyond the original City Walls and is read as separate to the tall buildings on its boundaries.

426. Views of the proposed building from within the tightly knit streets within the Conservation Area itself would be largely limited to the north-south section of New Street and southwards across Devonshire Square. Here there exists

visibility of a number of the City Cluster tall buildings including 30 St Mary Axe, the Leadenhall Building, 80 Houndsditch and 110 Bishopsgate. The proposed building would form the foreground of the City Cluster massing.

427. The proposed development would be a prominent addition to the skyline to the south of the Conservation Area which would be readily visible in views from within and at the boundary of the Conservation Area. The scale and appearance of the building reflects the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's setting.

428. Within views looking southward along Bishopsgate, as depicted within HTVIA View 29, the development would add to and sit within the existing massing and presence of the established City Cluster.

429. Views south, from outside but towards and across the Conservation Area from Brushfield Street would likewise see the proposed building as an addition to the existing cluster of tall buildings sitting in its backdrop.

430. In the cumulative scenario when viewed from Brushfield Street, the proposed development would form part of a stepping up of buildings within the City Cluster with 1 Undershaft in the background, and 55 and 99 Bishopsgate to the west in the foreground. This enhances the legibility and coherence of the Cluster with the stepping up being clearly defined in the layering of new tall buildings.

431. Officers consider that the proposed development within the conservation area's wider setting would have no adverse impacts on the setting of the Bishopsgate Conservation Area nor its significance.

Creechurch Conservation Area

Significance

432. 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.

433. 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 impacts.

434. 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

435. 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 Camomile Court building itself is not clearly visible, being set behind 70 St Mary Axe, and is not considered to make any contribution to the significance of the conservation area.

Impact

436. The proposed development would be located to the north-west of the Conservation Area. It would introduce a building of additional height and scale, when looking north-west along both Bevis Marks and Houndsditch and as seen in views 18 and 19 of the HTVIA. In these views, only the development would be partially visible, situated behind the distinctive curved form of 70 St Mary Axe. The scale, form, and appearance of the proposed development would accord with the existing character of the Conservation Area's local and wider setting. In the cumulative scenario the proposed development would be almost entirely occluded by other proposals. In either event the proposal would remain consistent with the striking backdrop of modern tall buildings in the City Cluster. Given its separation distance, and the layer of buildings in the foreground, it would remain distinct and separate from the Conservation Area, aligning with the existing character of its setting. As such, the proposals would not harm the setting, significance, character or appearance of the Conservation Area.

St Helen's Place Conservation Area

Significance

437. St. Helen's Place Conservation Area is a small, tightly defined area on the east side of Bishopsgate in close proximity to the Bank Conservation Area and the heart of the City. It is the sole survivor of an intricate pattern of spaces and alleys which once connected Bishopsgate and St Mary Axe. The heritage value of St Helen's Place CA is derived from its historic, if constrained, character, articulated by its tight-knit urban grain, medieval layout of streets and alleyways, and inclusion of two nationally important pre-1666 churches. St Helen's Church in particular remains as one of the most important pieces of medieval fabric surviving in the City. Its 13th century origins are still evident, as well as the physical manifestation of the building's organic history. There is

considerable 276 archaeological potential for the extensive precinct of the Priory of St Helen which for centuries influenced the form of the area.

438. The area continues to have deeply rooted associations with the Leathersellers Company whose architectural patronage from the reformation onwards exerted a massive influence on the area and continues to shape its development. Associations with Canadian exploration through the Hudson's Bay company and St Ethelburga's church. The development along St Helens Place is Edwardian, and a formally planned enclosure which is unusual in the City. It provides a quiet and delightful contrast to the surrounding City Cluster and activity of Bishopsgate. There is an important group of three buildings with narrow plot widths (nos. 46, 48 and 50) that are the only survivors of the finely grained appearance of Bishopsgate before the combination and redevelopment of building plots from the 20th century onwards. They give an indication of how Bishopsgate would have looked in the 19th century and with the larger buildings elsewhere illustrate the development of the street. Accordingly, they are significant components of the conservation area. They offer important contrasts to the ongoing planning and development of tall buildings along Bishopsgate as part of the Eastern City Cluster. Hasilwood House provides an arched public entrance and enclosure to St Helens Place a discreet enclave of a type that is unusual in the City.

Setting

439. The Conservation Area has, uniquely in a nationwide context, a dramatic setting among the tall buildings of the City Cluster. The Conservation Area's current setting contributes very little to an appreciation of its heritage value. The proposed development is located to the north-east of the Conservation Area and already includes a tall building that does not contribute to the significance of the Conservation Area. The published Character Summary for St Helen's Place CA does not note specific views, but the views into and within St Helen's Place are clearly of importance; here, again, the backdrop of the tall buildings of the Cluster makes for a dramatic juxtaposition with the Edwardian CA buildings in the foreground. Views up and down Bishopsgate and looking east at St Helen's Church share this quality; nowhere in the conservation area are the presence of tall buildings not felt to some degree, and this is intrinsic to its existing setting.

Impact

440. The Conservation Area lies within the Eastern City Cluster policy area for tall buildings. The dramatic setting among the tall buildings of the City Cluster is identified as a key characteristic which contributes to its special interest. The proposed development would have no visibility from within St Helen's Place itself but would be partly visible in views from the south from Great St Helens and Undershaft.

441. The proposed development would introduce an additional tall building element to the north of the Conservation Area, adding further to the existing setting established by the presence of modern skyscrapers contrasting with the smaller-scale historic built environment. As such, it would be consistent with the existing setting and the experience of the commercial centre and

juxtapositions of old and new. The proposed developed is not considered to result in harm to the setting, significance, character or appearance of the Conservation Area.

Bank Conservation Area

Significance

442. The area comprises the commercial heart of the City of London around Bank Junction. The prevailing character of the Conservation Area is comprised of a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing a sense of an intact historic townscape. The contrast of medieval street plan, ornate 18th and 19th century commercial buildings interspersed with modern office development forms the quintessential character of the City of London.

443. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic connection of financial power with its high historic associative interest. This is expressed through the sense of dramatic arrival at Bank Junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction. The Bank Conservation Area combines architectural, historic and social heritage value.

Setting

444. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate and Gracechurch Street. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east providing a strong contrast between old and new.

445. Bank Conservation Area is also bordered by Finsbury Circus Conservation Area to the north, Guildhall Conservation Area to the West and Leadenhall Market Conservation Area to the east which all form an important contribution to its setting.

446. The Thames and London Bridge also contribute to its setting providing significant views of buildings within the conservation area including those of the Wren churches. The character of Bank Junction as a historic centre is presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.

Impact

447. There would be limited visibility of the proposed development from within Bank Conservation Area, largely confined to glimpses along Threadneedle Street looking north-east, and as far west as Bank Junction. In these views, only a partial, tapered segment of the tower would be visible being mostly screened by and seen in the context of existing tall buildings in the City Cluster, including 8 and 22 Bishopsgate, Tower 42 and 110 Bishopsgate. Where visible, the proposed development would accord with the City Cluster's character, which is distinct and contrasting from the Conservation Area in the foreground.

448. Overall, the scale, form, and appearance of the proposed development would align with the existing character of the Conservation Area's wider setting. In both baseline and cumulative scenarios, the proposed development would be only partially visible in the context of the established City Cluster. As such, the proposals would not harm the setting, significance, character or appearance of Bank Conservation Area.

New Broad Street Conservation Area

Significance

449. New Broad Street Conservation Area was designated in December 1981. The Conservation Area lies to the east of Finsbury Circus and south of Broadgate in the north-eastern part of the City. The heritage value of the Conservation Area is derived in its uniformity in building scale along New Broad Street, coupled with the historical character of similarly scaled 19th century commercial buildings, many in Portland stone with a variety in ornament. Further historic and architectural interest is derived from All Hallows on the Wall (Grade I), which is considered a significant listed building within the Conservation Area along with the remains of the City Wall beneath the church and churchyard, nos. 82 and 83 London Wall and the junction of London Wall and Blomfield Street which are designated Scheduled Ancient Monuments.

Setting

450. The Conservation Area is surrounded by a number of other Conservation Areas including Bank, Finsbury Circus, and Bishopsgate. The proximity of the Conservation Area to Finsbury Circus, comprising a formal area of green space with a surrounding high quality architectural, forms an attractive feature within the immediate setting of the New Broad Street Conservation Area. The Conservation Area is located within close proximity to the tall buildings which form the City Cluster. There are also a number of modern buildings including those along Bishopsgate and London Wall which illustrate the extent of post war change that has occurred within the City around the Conservation Area.

Impact

451. The New Broad Street Conservation Area is located at the heart of the Square Mile's commercial district and its setting is characterised by tall development in the surrounds.

452. The proposed development would have only limited visibility when looking east along New Broad Street sitting largely behind the existing tower of 110 Bishopsgate. In the cumulative scenario when viewed here, the proposed development would no longer be visible, sitting entirely behind the consented redevelopment of 55 Old Broad Street. When looking east along London Wall, along the southern boundary of the Conservation Area the proposal would be partly visible in the gap between 110 and 100 Bishopsgate.

453. The scale and appearance of the building accords with the established City Cluster townscape, which forms a significant part of the Conservation Area's setting. The development would form part of a more distant, background layer of buildings within the City Cluster with 55 Old Broad Street in the foreground, 99, 100 and 110 Bishopsgate in the background and Tower 42 to the edge.

454. By reason of its limited visibility, distance and complementary character to that of the surrounding City Cluster, officers consider that the proposed development would have no adverse impacts on the character, significance and setting of the New Broad Street Conservation Area.

Finsbury Circus Conservation Area

Significance

455. The Conservation Area is a small area comprising the registered park and garden of Finsbury Circus and its surrounding development. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the CA is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London.

456. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus. It features large 19th and 20th century commercial buildings with extensive ornamental detail and a generally uniform roofline. Buildings are of particular historic and architectural interest as impressive 19th and 20th century commercial buildings with extensive detailing, modelling, uniform height and varied rooflines.

457. There are a number of listed buildings in the Conservation Area: London Wall (Scheduled Ancient Monument), Lutyens House (GII*), Park House and Gardens (GII), Finsbury House (GII), London Wall Buildings (GII), Salisbury House (GII), Business School, London Metropolitan University (GII), Drinking fountain and shelter, north side of gardens (GII). The Finsbury Circus Registered Historic Park and Garden (Grade II) sits at the centre of the Conservation Area.

Setting

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

459. Due to the considerable distance and extent of interposing development, there is no visual relationship with the Conservation Area and the existing building on the development site.

Impact

460. In views from the western side of the gardens within the Conservation Area looking east, the upper levels of the proposed tower would be visible alongside and behind 110 Bishopsgate. The proposal would largely infill the current skyline gap between 110 and 100 Bishopsgate but it is noted that this view would be obscured by leaf cover for part of the year. The visibility of the proposed development would be limited and fleeting, quickly moving out of view from within the central gardens, with the buildings lining its edges retaining their dominant, enclosing presence. The addition of the proposal here would not challenge the appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Conservation Area and would make and additional, but recessive contribution to the varied Cluster of tall buildings which are clearly distinct from this historic space.

461. There would be no harm to the setting or significance of the Finsbury Circus Conservation Area.

Wentworth Street Conservation Area (London Borough of Tower Hamlets)

Significance

462. The area's significance derives from the architectural interest of constituent buildings as well as its history as a mixed-use residential and commercial location. Originally sitting outside the city walls, but long since developing a strong and enduring association with the clothing industry which remains apparent today.

Setting

463. The conservation area is split into two character areas – east and west. The western area, closest to the proposed development is a regular grid structure

of streets with medieval origins, and a fine grain of low-rise 19th century buildings. The eastern area includes Commercial Street which includes many mid-late Victorian buildings of architectural and historic merit.

464. The conservation area is set within a surrounding of tall buildings, including the reclad 1960s tower block Denning Point immediately to the south, 9 Frying Pan Alley to its north and Petticoat Tower within the City boundary. Tall buildings of the city cluster form an established background setting in views looking south-west along Cobb Street and Wentworth Street. This juxtaposition of the low-rise, close-knit buildings of the conservation area with the height and massing of the City Cluster towers creates an important understanding of its distinction from the historic banking and white collar commerce of the City with the CA's historic identity as a place of manufacturing, clothing retail and housing.

Impact

465. The proposed development would be visible in views along the conservation area's principal cross-route, Wentworth Street, and from the eastern end of Cobb Street when looking south-west. The proposal would be prominent, owing to the long axial views which are oriented towards the City Cluster. However, it would be seen set amongst the existing Cluster towers and in this context it would accord with the modern built character and appearance of the towers, forming a complementary addition to this element of the area's setting. The proposal would further add to the contrasting setting of the city cluster which enables a legible understanding of the conservation area's history and difference to that of the financial heart of the City. As such there would be no harm to the setting or significance of the Wentworth Street Conservation Area.

Non-designated Heritage Assets

30 St Mary Axe (Non-designated heritage asset)

Significance

466. Completed in 2003, 30 St Mary Axe is regarded as a Non-Designated Heritage Asset due to its striking architectural contribution and impact on the skyline. Since completion, the building has caught the public imagination and arguably developed an architectural iconic status, frequently used to symbolize the City of London and London as a whole, both to the UK and globally (for example, publicizing the London Olympics) and enshrining its nickname as the Gherkin. The building has won numerous architectural awards including the Stirling Prize in 2004. As one of the earlier towers in an area subsequently earmarked for a cluster of towers, 30 St Mary Axe has been subsumed in the emerging cluster by both taller and bulkier towers. As such its distinctive appearance on the skyline of London has significantly diminished, particularly in views from the west. Despite its reduced visual prominence in many views, its striking appearance, profile and prominence means it retains a high architectural significance worthy of being identified as a Non-Designated Heritage Asset.

Setting

467. 30 St Mary Axe draws a moderate degree of significance from setting, principally through its position on the eastern edge of the cluster which it has come to define, both in local and longer-range strategic views of the City.

Impact

468. Within the immediate setting of 30 St Mary Axe the proposal would form an additional tall element to complement the existing character of tall buildings in the Cluster. The proposed development would introduce a further element of comparable scale to the arrangement of tall buildings of which 30 St Mary Axe forms part but retain a fair degree of separation.

469. In longer-range views from the south, east and west there would be no additional occlusion of views of the asset resulting from the development. From directly north the proposal would fully occlude visibility of 30 St Mary Axe in views south along Bishopsgate. Along Bishopsgate as far north as Folgate Street, 30 St Mary Axe forms a distinctive skyline feature, but seen as a component of the City Cluster. It is only in part occluded to the side by 80 Houndsditch, but its characteristic 'gherkin' shape and top can be discerned.

470. While the asset would be occluded by the scheme in views along Bishopsgate, its architectural significance would be legible and appreciable in many other viewing experiences. Further, that architectural interest would be unchanged by the proposals directly. As such, there would be no harm to the setting or significance of the non-designated heritage asset.

Other Heritage Assets

471. 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.

472. 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.

473. 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.

474. 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.

475. In all cases it was, for these reasons, judged by officers that the proposals would have no potential impact. In some cases, these include assets which the GLA consider would be harmed by the proposals; but officers for the aforementioned reasons take a different, proportionate view. The assets scoped out include:

Listed Buildings

- St Katherine Cree (Grade I)
- 27 Creechurch Lane No's 2-16 (Grade II)
- Church of St Botolph, Aldgate (Grade I)
- Guild Church of St Ethelburga the Virgin (Grade I)
- The Monument (Scheduled Monument and Grade I)
- Museum of the Home (formerly The Geffrye Museum Grade I)
- Holland House (Grade II*)
- 33 Leadenhall Market (Grade II*)
- Lloyd's Registry, 71 Fenchurch Street (Grade II*)
- Gateway in yard of Church of St Katherine Cree (Grade II)
- Liverpool Street Station (Grade II)
- Hasilwood House 52-68 Bishopsgate (Grade II)
- Park House and Garden House (Grade II)
- 20 and 21 Billiter Street (Grade II)
- 2-16 Creechurch Lane (Grade II)
- Whitehall Court (Grade II*)
- Horse Guards (Grade I)
- War Office (Grade II*)
- Ministry of Defence (Grade I)
- New Street Group
- Bunhill Burial Ground Registered Historic Park and Garden (Grade I)
- St James Park Registered Historic Park and Garden (Grade I)
- Church of St Botolph Without Bishopsgate (Grade II*)
- 139-144 Leadenhall Street (Grade II)
- 147-148 Leadenhall Street (Grade II)
  Tower and remains of Church
- 162 & 164 Bishopsgate (Grade II)
- Finsbury House (22 & 23 Blomfield Street) (Grade II)
- St Paul's Cathedral (Grade I)

Conservation Areas

- Bunhill Fields and Finsbury Square Conservation Area (LBI)
- Leadenhall Market Conservation Area
- New Broad Street Conservation Area

Non-designated Heritage Assets

- 33-34 Bury Street (Non-designated heritage asset)
- 18-20 Creechurch Lane (Cree House) (Non-designated heritage asset)
- 24 Creechurch Lane (Fibi House) (Non-designated heritage asset
- 12-14 Mitre Street (Mitre House) (Non-designated heritage asset
- 27-31 Mitre Street (Non-designated heritage asset)
- Liverpool Street Arcade (Non-designated heritage asset)
- 113-116 Leadenhall Street (Non-designated heritage asset)

Conclusion on Heritage

476. The proposals place heritage at the heart of placemaking, in line with emerging City Plan 2040 policy S11. The design has been developed from consideration of the heritage assets on the site (and beyond, in the case of the WHS) and would result in a moderate enhancement to the significance of the Churchyard of St Augustine Papey, a non-designated heritage asset, and a low level of enhancement to the significance of the London Wall Scheduled Ancient Monument.

477. The proposals would preserve the settings and significance of all relevant designated and non-designated heritage assets and comply with Local Plan policies CS7, CS12 and DM12.1, emerging City Plan 2040 S11, HE1 and HE2, London Plan policies HC1 and HC2 and all relevant sections and paragraphs in the NPPF.

Archaeology

478. 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. An Environmental Statement and Archaeological Desk-Based Assessment accompanies the planning application.

479. 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 Britian's largest and most important urban settlement for most of that time. Consequently, the City of London 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.

480. In this case, there is a single-depth basement under Camomile Court and it is likely that archaeological remains still survive below this relatively shallow basement, including the remains of the later medieval defensive ditch associated with the City wall; and a double-depth basement under 63 St Mary Axe, with much less potential for remains surviving below due to the greater depth of the basement. There is high potential for later and post-medieval burials and other remains in the former churchyard and possibly for Roman and early medieval remains below it. For clarity, these potential remains are not considered to be of equivalent significance to scheduled monuments (NPPF fn 75).

481. Historic England, the City of London Archaeological Trust (CoLAT) and the Council for British Archaeology (CBA) have all voiced concerns about the methodology employed to assess the archaeological potential of the application site, including that because no physical evaluation works (e.g. trial pits) have been undertaken, the potential intactness of the former churchyard has been downplayed, and that the potential for Roman remains has been downplayed or overlooked.

482. To address these concerns, officers consider it reasonable, in the absence of definitive evidence to the contrary, to assume that the site has the highest level of intactness and survival of the aforementioned remains; with a correspondingly maximal level of impact assumed; and to assess the proposals on this basis. With this in mind, the proposals would have an impact on and would remove all archaeological remains on the site. At the fullest extent of archaeological survival, this would include all the burials in and other contents of the churchyard, and any pre-medieval deposits, including Roman, beneath the burial ground.

483. Historic England are of the view that this would cause the total loss of the burial ground as a non-designated heritage asset, a position with which officers, as stated in the preceding sections, do not agree, its above-ground form not only surviving but being enhanced and reunited, visually, with the section of the London wall SAM. The Council for British Archaeology (CBA) considers that the proposals would cause substantial harm to the archaeology and that permission be refused for this reason.

484. Officers disagree with these conclusions, in part at least for the reasons set out in the assessment of the impact on the former churchyard above. While officers acknowledge that the proposals could have an impact on the archaeology, if it survives, and that this would be mitigated by the proposed conditions. Officers consider that when the impact on the non-designated

heritage asset is considered overall, there will be a moderate level of enhancement.

485. The recording, excavation and analysis of a potentially high number of burials has the potential to provide new data, including evidence of burial practices over time, details of individuals and family groups, and characteristics such as how changing environments, health, impact of urbanisation, mobility and migration affected the lives of past City communities. It would advance knowledge of an entire City parish and supplement documentary evidence. The analysis, publication and archiving of this programme of archaeological work would augment and enhance existing knowledge and data from excavations of the small number of burial grounds in the City and in London, as well as informing the artwork and final designs of the relandscaped churchyard.

486. As part of the proposals, in the event of the burial ground being found to be intact, a PhD placement would be funded by the applicant to participate in the aforementioned work of recording and carry out the excavation analysis, recording, publication and archiving. It is anticipated that this would be in partnership with the London Museum and/or another Arts and Humanities Research Council (AHRC) body. This would go beyond the usual archaeological requirements and would represent an enhancement of the usual archaeological processes required post-permission.

487. As such, any potential impact on archaeology is considered to be satisfactorily weighed against and counterbalanced by the considerable potential for learning that this site and the proposals represent. Conditions are attached to cover site investigation and archaeological evaluation and a programme of archaeological work. Subject to these, the proposal 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.

Accessibility and Inclusivity

488. Accessible and inclusive design is covered by NPPF paragraphs 96 and 135, London Plan policy D5, Local Plan policy DM10.8 and emerging City Plan 2040 policy HL1. These policies seek to ensure that the City is inclusive and welcome for all, with no disabling barriers that is its responsive to the requirements of all users.

489. London Plan policy D5 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. An Inclusive Design Statement has been prepared by Lord Consultants Limited, and this is appended to the Design and Access Statement. The proposals were presented to and reviewed by the City of London Access Group (CoLAG) on the 1st June 2023, 8th May 2024 and 12th November 2024.

490. The site is well served by public transport, noting that public transport is not accessible for all people. Key step-free points of arrival are at distances greater than 50m from the building entrances. As part of the Inclusive Access Management Plan (IAMP) that would be secured by condition, details and the mapping of resting points from points of arrival by public transport the entrances to the building would be reserved. As public transport is not accessible for all people, details of informal setting down points in the vicinity have been included in the submission, the details of these would be required to be included in the IAMP that is secured by condition.

491. London Plan policy T6.5 states that all developments should be car free except for at least one on, or off-street disabled persons parking bay. There are four existing on-street parking bays and these would be retained, it is noted that Blue Badge holders are restricted to four hours stay in the on-street spaces. The City of London runs the Red Badge scheme and the same constraints on time are not applicable. As part of the proposed development, two accessible spaces are proposed at ground floor level, within the open servicing area. These spaces would be available for use between 7am and 7pm when the servicing area is not in use for servicing (it is highlighted that delivery and servicing on the site is restricted and cannot take place between 7am and 7pm, this is discussed in the Highways and Transportation section below). As the spaces would only be available between 7am and 7pm, details of the booking and management of these spaces would be provided in the Car Parking Management Plan secured within the S106 agreement. Conditions are also attached to ensure that these spaces are free for users and available for the lifetime of the development.

492. Standards for inclusive cycling are in the London Cycle Design Standards (LCDS). The LCDS states that 5% of long and short-term spaces should accommodate larger and adapted cycles with associated facilities. 73 larger and accessible cycle storage spaces are proposed, which represents 5% of the spaces provided. Two cycle lifts and stairs with cycle channels would be provided with the accessible long stay storage on basement levels 2-4. Full details of the accessible cycle parking including details of the cycle lifts, corridor widths, door automation and setting out of larger cycle storage spaces and end of trip facilities would be secured by condition. In respect of the short stay cycle parking, this is proposed both and basement level and within the public realm and is in line with policy. 5% of the short stay spaces would be accessible. The accessible cycle spaces within the public realm should be located at the ends of the on-street Sheffield stands and would be secured by condition. In addition to the details being secured by condition, the details of the cycle parking and end of trip facilities would also be required to be included in the IAMP so that users of the building can have information about the facilities prior to arriving at the building.

493. London Plan policy D5 states that entrances into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment. Revolving doors are not inclusive of a range of people and require the use of pass doors, which

reinforce separation. All of the main entrances to the building would be either sliding door or barrel doors which provide a more inclusive development. The full details of the entrances would be secured by condition to ensure that the entrance strategy is inclusive and the details of the entrances would also be required to be included in the IAMP so that building users can preview the entrances prior to arriving at the building.

494. The vertical access through the building is achieved through a mix of passenger lifts and stairs which would adhere to Building Regulations. In regard to horizontal movement, the proposed corridor widths are consistent with Building Regulations and include sufficient passing room or sightlines to support ease of use. It is noted that where there are doors on access routes these will be required to be automated or power assisted for ease of movement within the building. These details along with details of the speed gates and opening mechanisms would be secured by condition.

495. Details of the materials requiring details of slip resistance and contrast to be submitted would be secured by condition.

496. A range of sanitary facilities is proposed. A Changing Places facility is proposed at basement level 1, which is suitable for use by people with multiple and/or complex impairments and up to two carers. This facility would be accessible to the public and the details of this facility would be via an obligation within the S106 agreement. Full details of the Changing Places facility would also be secured by condition, including the layout and route to and from the facility. The details of the Changing Places facility would also be required to be included as part of the IAMP. Wheelchair accessible toilets (AWC) are proposed across the development, including an externally accessible toilet at street level. The AWC's would provide options for both right- and left-handed transfer and it is welcomed that that space in the AWC's exceeds Building Regulations. Toilet facilities will be designed to be consistent with update Building Regulations and best practice with male, female and universal facilities, noting that suitably sized ambulant accessible toilets have been considered. Assistance animals may also visit the building and options for spend areas needs to be considered, as part of the IAMP secured by condition appropriate areas would need to be identified including both grass and hard surfaces.

497. The proposed multi-function space as part of the cultural offer includes the potential to include auditorium style seating. The details of this would be secured by condition to ensure that there is provision for the greatest range of people including options for wheelchair users, and people who need arm supports or back-rests. Further to the this, the Multifunctional Cultural Space Management Plan and Social Enterprise Space Management Plan would need to demonstrate how these spaces would be inclusive in terms of procurement, programming, provision of opportunities and layout.

498. The proposed public realm and private terraces would have accessible step-free access and would include a range of planting and seating. The full details of the seating would be secured by condition to ensure that options for seating would be provided including single, aligned and group facing seating, seating at a range of heights, and with options for backrests and arms for support when rising, and for wheelchair users to transfer, or sit alongside companions. Details of the contrast of the materials within the public realm would be secured by condition. Full details of planting and landscaping proposed within the development would be secured by condition and the IAMP is also required to include details on planting. The IAMP secured by condition will also include details on how the lighting strategy would be inclusive.

499. The proposals include external terraces and walkways on the lower levels of the building (levels 1 to 3), these would be accessed by an external stair or for those who need step-free access 'Camomile Park' lift which would be situated adjacent to the external stair is proposed. The lift is large enough to accommodate a wheelchair or mobility scooter user. The external stair will connect the walkways with the intention of allowing people to 'wander down' between levels and the lift would be used to provide step-free access between the levels. The thresholds are shown as being step-free and this would be secured by condition to ensure that they are constructed as such. It is noted that there is a pinch point at the top of the stairs at the junction of the south and western terraces, and as such, notwithstanding the submitted drawings, full details of the routes through between the south and western terraces on levels 1 to 3 would be secured by condition to ensure that there is sufficient room for a wheelchair or mobility scooter use, or person using crutches or with an assistance animal to be able to move comfortably between the terraces, without conflict with people using the stairs.

500. An inclusive wayfinding strategy would be secured by condition to ensure that wayfinding is legible and intuitive.

501. In respect of emergency evacuation, two firefighting/evacuation lifts would be provided in the central core and two-way communication points, and audible and visual alarm systems are proposed. It is highlighted; the Fire Safety section of this report discusses that no objection is raised to the submitted Fire Statement. The IAMP secured by condition is required to include details of training frequents and issue of Personal Emergency Evacuation Plans.

502. Overall, the proposals accord with the aims of the relevant policies and subject to the imposition of the aforementioned conditions and S106 obligations, the proposed development accords with policy D5 of the London Plan, policy DM10.8 of the Local Plan and policy HL1 of the emerging City Plan 2040.

Highways and Transportation

503. The site is located at the eastern periphery of the City of London (CoL), 63 St Mary Axe occupies a fundamental position within the urban fabric, serving as a conduit between the historic core of the City and its adjacent neighbourhoods. Bounded by Camomile Street, Houndsditch, Outwich Street and St Mary Axe, the site functions as a natural route between the dense commercial district, residential communities, and cultural hubs.

504. The immediate surroundings are characterized by a blend of commercial, retail, and public uses. To the west, prominent edifices such as Salesforce Tower and 100 Bishopsgate contribute to the contemporary skyline, while smaller-scale developments to the north and east reflect the area's historical grain. Retail and dining establishments along nearby streets enhance the vibrancy of the area, supporting substantial foot traffic during the day.

505. The site is relatively level, featuring a compact urban grain typical of the City of London. Streets around the site are well-defined by built form, creating a sense of enclosure. Camomile Street and Houndsditch are slightly wider thoroughfares, whereas Outwich Street provides a quieter, more intimate frontage.

506. Public Transport Accessibility Level (PTAL) for this development is 6b which is the highest PTAL level. This score was derived using TfL's WebCAT service.

507. The site benefits from excellent transport connections, with Liverpool Street Station at approximately 250 meters to the west, offering national rail, underground, and Elizabeth Line services. It also has high level access to several underground stations, including Aldgate, Aldgate East, and Bank. Fenchurch Street station is also a short walk to the southeast. Several bus routes traverse Houndsditch and Camomile Street, further enhancing accessibility. The area is highly pedestrianized, with surrounding streets forming part of key walking routes through the City.

508. Camomile Street, Outwich Street and Houndsditch forms part of a one-way gyratory around the site, with a two-way section on Camomile Street to the southwest of the site. Camomile Street has an advisory cycle lane.

509. Parking restrictions operate on the nearby streets from Monday to Friday, 7AM to 7PM, and Saturday, 7AM to 11AM (except Christmas Day, Good Friday or Bank Holiday).

510. A section of the Camomile Street that is adjacent to the site, has double yellow lines restricting parking and stopping. Outwich Street has zigzags that are required for the pedestrian crossings and loading restrictions. The section of the Houndsditch which is adjacent to the site has 4 on-street car parking

spaces and e-scooter bay, and a lengthy bus stand opposite and the rest includes double yellow lines with waiting restrictions.

511. This application is supported with Transport Assessment (TA) that includes the Active Travel Zone (ATZ) assessment. The TA states that this assessment was carried out in line with TfL Transport Assessment guidance to support Vision Zero and the Healthy Streets approach. Three key routes were assessed to cover a number of key destinations. Key Route One: to Bank Station via Camomile Street (A1211) bus stops, Bishopsgate (A10) bus stops. Key Route Two: to Liverpool Street Station via Jubilee Gardens; Key Route Three: to Aldgate East Station via Houndsditch (A1211) bus stops. The worst part of each key route was reviewed and assessed against eight of the 10 healthy streets criteria with details contained in the TA.

512. It is noted that Network Rail have encourage the City to consider the potential allocation of CIL to address the collective infrastructure challenged created by cumulative growth. It is highlighted that the City of London addressed cumulative impacts of approved development sites via securing public realm improvements through Section 278 Agreements. These are mainly delivered in the vicinity of the sites, than in areas located further away, such as in this instance the LSS.

513. Vision Zero assessment was undertaken within a 250m radius of the site over the past three years (2020-2022). No fatal collisions were recorded on this zone, 17 were serious collisions and 37 slight collisions. Among the 17 serious collisions, five collisions took place at the Bishopsgate (A10)/ Wormwood Street (A1211)/Camomile Street (A1211) junction.

514. In August 2020, TfL introduced several changes along the Bishopsgate (A10), part of the corridor improvement scheme, designed to improve safety for walking, cycling and public transport use, in line with Vision Zero. New restrictions for vehicles using the road on weekdays between 07:00am to 19:00pm, wider footways and a number of banned turns were part of the scheme at the time, and other interventions to improve safety are work in progress.

515. The City of London (CoL) is developing proposals for a London Wall Corridor (LWC) scheme aimed at improving safety and enhancing the public realm, which will impact the highway network surrounding this development. The LWC scheme is considering changes to the highway layout along London Wall, between Finsbury Circus and Aldgate Square, including potential carriageway width reductions, the introduction of new segregated cycle lanes, timed closures for vehicular traffic in certain sections, and improvements to public realm areas such as widened footways, new seating, and landscaping. Although the LWC scheme is currently at the feasibility/design stage and subject to public consultation, the applicant has been engaged early and encouraged to consider potential changes and develop their proposal in a way that complements the LWC scheme

Trip Generation (All Modes)

516. The trip generation methodology is based on the TRICS database using comparable sites, with some adjustments to the mode shares after considering 2011 Census 'Method of Travel to Work' data and applicable MSOA layer to reflect the local characteristics and high provision of public transport and the fact that this is a car free development.

517. The net change in trips generated from existing to proposed, during AM and PM peaks for all travel modes, is shown on the table below (extract from the submitted TA Table 5-18).

MODE OF TRAVEL	AM PEAK (08:00 – 09:00)			PM PEAK (17:00 – 18:00)		
	ARRIVALS	DEPARTURES	TOTAL	ARRIVALS	DEPARTURES	TOTAL
Underground	551	12	563	49	538	587
Train	796	18	814	71	780	851
Bus	242	5	247	42	235	276
Taxi	7	1	8	1	4	5
Motorcycle	-5	-1	-6	0	-3	-4
Car or van	-7	-1	-8	0	-4	-5
Passenger	-1	0	-1	0	-1	-1
Bicycle	317	18	335	15	251	266
On foot	284	185	469	74	109	183
Total	**2184**	**236**	**2421**	249	1909	2158

Table 1.2 Trip generation for the proposed development

518. The Proposed Development is expected to generate 2,421 trips (All modes) during the AM peak and 2,158 trips (All modes) during the PM peak.

519. To estimate the impact on the public transport network, development trips were assigned to the network using Census origin-destination data, (method of travel to work CoL location of usual residence and place of work by method of travel to work). For each travel mode an assessment was presented on the TA and concludes that the highest proportion of trips to and from this development is expected from Liverpool Street Station.

Trip Generation for Deliveries and Servicing

520. The CoL's Transport Strategy and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, state that:

The City's transport infrastructure will be maintained and improved by minimizing road danger, congestion, and reducing vehicle emissions by:

- Designing and managing streets in accordance with the City of London street hierarchy;
- Minimizing the impact of freight and servicing trips through measures such as the provision of on-site servicing facilities, timing deliveries outside peak

hours, adopting area-wide solutions, freight consolidation, and promoting deliveries by foot or bicycle;
- Facilitating essential traffic, including emergency service vehicles, buses, freight, and private transport for people with particular access needs, while minimizing the environmental impact of these modes;
- Requiring the provision of infrastructure for alternative-fuel vehicles and zero-emissions vehicles, such as off-street vehicle charging points.

521. In addition, Part H of this Policy states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans, and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimized as a result of their development. This includes promoting best practices such as direct vision standards and zero-vision policies to minimize the danger of travel and servicing, including through the use of river transport. This aligns with the adopted policies of the Local Plan 2015, Strategic Policy CS16.

522. The Transport Assessment analysed the current deliveries and servicing trips for 22 Bishopsgate (22 BG), acknowledging similarities to the proposed albeit this development is much smaller in size. The 22 BG is a mixed-use development office-led with ancillary food and beverage, community use, and retail. It is accepted that the proposed development is likely to generate similar trips per land use to that of 22 Bishopsgate for each 100 sqm therefore, data from 22BG can assist in predicting future trips for this development.

523. Based on the comparison of two developments the proposed development is expected to generate 22 servicing trips per day, using the same consolidation strategy as the 22 BG building. Accounting for the fact that 22 BG was operating at 62% of its full capacity at the time, the servicing trip number was extrapolated to 35 vehicles per day to cover the full occupation.

524. If office floor area and sui generis floor areas are combined, using the office rate of 0.22 then the area with 93,663 sqm is predicted to generate 206 trips, and for the rest 4,242sqm combined floorspace using the rate 1.35 it generates 57 trips. Total trip generation for this development is 263.

525. The applicant is targeting a higher than 50 % rate of consolidation requiring a higher proportion of the LGV and HGV trips.

526. The proposed modal split (office) for the 85% targeted consolidation is: 5% MC; 10% car;45% LGV and 40% HGV's (3 axle), generating 30 trips (office) (2 MC; 3 car; 13LGV and 12 HGV's (3 axle)), whereas for the modal split (retail) is 0% MC; 25% car; 25% LGV and 50 % HGV's (3 axle), generating 8 trips (0 MC; 2 car; 2 LGV and 4 HGV's (3 axle)).

527. The table 1.3 below shows trips generated with and without consolidation and mode split. It also shows the target of 40 deliveries a day which applicant is aiming to achieve with higher consolidation rate.

Mode	% Modal split office	Trips No consolidation	Trips With 50% consolidation	% Modal split retail	Trips No consolidation	Trips With 50% consolidation	Deliveries development* With 50% Consolidation	Deliveries development* Target Consolidation
Motorcycle /scooter	4	8	**4**	0	0	**0**	2	2
Car	34	70	**35**	25	14	**7**	20	4
LGV	53	109	**54**	25	14	**7**	30	18
Rigid 3 axle (HGV)	9	19	**10**	50	29	**14**	12	16
Rigid 4 axle (HGV)	0	0	**0**	0	0	**0**	0	0
Total	100	**206**	**103**	100	**57**	**28**	**64**	**40**

*numbers adjusted in columns to make even numbers

Table 1.3 trips generated and mode split (with and without consolidation)

528. The number of deliveries/servicing trips is capped at 64 per day (with 50% consolidation) with the proposed mix as shown on the table 1.3. secured though the s106 Delivery and Servicing Management Plan (DSMP). Deliveries by cargo bikes are permitted at all times in the areas dedicated and managed by the facilities management. This 50% consolidation will be secured by condition.

529. The flexible servicing area includes two servicing bays that will function as public realm space during the day and facilitate deliveries and serving from 7PM to 7AM. Swept Path analysis was included in TA and show manoeuvring in and out of the servicing area. Servicing bays can accommodate the 6 proposed deliveries per hour for overnight servicing, thus providing sufficient capacity for all activities associated with deliveries /servicing /refuse/ recycling to facilitate this development.

530. In addition, a booking system is required to manage and allocate delivery/servicing slots for all land uses of this development and secured via S.106. The reason is, to ensure safety is maintained on the public highway at the allocated times and no queuing in and around the vicinity. The booking system must keep records of all trips generated following the occupation and data kept thereafter. The trip records to be presented to the CoL upon request to ensure compliance.

531. To ensure no conflicts with delivery/ servicing activities and to comply with the criteria on hours of use, it is recommended that collection of refuse/recycling is part of the same system that manages the delivery and servicing slots. Allocated slots for refuse/recycling can then be reviewed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development. This ensures that loading/parking area is managed within the allocated times, and it facilitates different requirements. It is highlighted and as discussed in the Noise and Vibration section of this report, as to protect neighbouring amenity refuse collection including glass would need to take place between 8pm and 11pm.

532. All of the terms above would be secured through a S106 obligation in respect of the Delivery and Servicing Management Plan.

Pedestrian Comfort Levels

533. The Pedestrian Comfort Level (PCL) assessment was provided on a Technical Note (TN), supplementary to the TA, to determine the existing and proposed levels in the vicinity of this development. TfL guidance 'Pedestrian Comfort Level Guidance v2' (2019) was followed. PCL levels range from A to E to represent differing levels of suitability on different areas of pedestrian movements and are categorised as: comfortable, acceptable, at risk and unacceptable /uncomfortable. For the areas (office and retail development) where the PCL level is C, this is considered at risk, whereas PCL below level C is unacceptable and require highways improvements and widening of the footways or crossings.

534. Eight points were selected as shown on the figure 1.1 below. The assessment of the existing, baseline scenario, does not include points 7 and 8 because they represent the new public routes created as part of this development. The public routes through the building will be accessible to the public between 8am and 8pm, and this would be secured within the Management Plan secured within the S106 agreement.

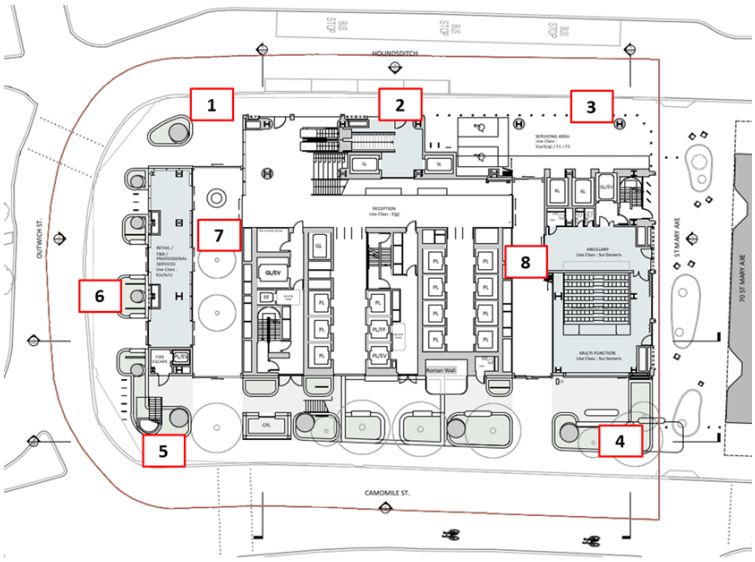


Fig. 1.1 Selected sites for PCL assessments (proposed scenario)

535. To obtain the PCL's data used is from AM pedestrian counts taken on the footways surrounding the site on the 30 April 2024 conducted for the London Wall Corridor Scheme. (LWCS). Section of St Mary Axe between the site and 70 St Mary Axe was not captured therefore not included in this assessment. Also, only the AM peak hour pedestrian flow data 08:00-09:00 was captured as part of the LWSC, nevertheless as this hour represents the highest peak for development trips, in this case, is considered acceptable.

Assessment Site	PCL Width (m)	AM peak
1	1.85	A-
2	1.75	A-
3	1.92	A-
4	2.16	A+
5	2.9	A+
6	2.53	A+

Table. 1.4 Existing PCL's, site (1-6)

Assessment Site	PCL Width (m)	AM peak
1	8.4	A
2	2.2	A-
3	8.4	A+
4	2.16	A
5	3.15	A
6	3.4	A+

7	5.2	A
8	3.1	A

Table. 1.5 Proposed PCL's, site (1-8)

536. The proposed development pedestrian trips have been assigned based on the public transport availability and proportionately distributed based on probability of such movements taking place. PCL scores for the streets of this type (for Office and Retail streets) are classified, as follows: for level A to B is Comfortable; level B- to C+ is Acceptable. Further information that relates to the proposed trip distribution, assumptions on the future base 2040 scenario and reasoning, can be found on the TN.

537. For the proposed scheme, all PCL's are acceptable; however they rely on future footway widening, as part of the LWCS. The applicant has agreed to make a substantial contribution towards the LWCS, or any other City of London project under a different name, to ensure that footways are widened as assessed and shown on the table 1.5.

Cycle Parking

538. Policy DM 16.3 of the Local Plan requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible.

539. The London Plan, Policy T5 Cycling indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle, through:

- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.
- securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.

540. The level of the required cycle parking provision is dependent on the location of the proposed development. The City of London (CoL) is within the area where higher minimum cycle parking standards apply.

541. This proposal includes a total of 1,463 (long stay) and 101 (short stay) cycle parking spaces. Policy T5 of the London Plan has cycle parking standards for different land uses. The table 1.6 below, shows the standard requirements in compliance with the London Plan and the provision.

Use Class	Floor Area sqm (GEA)	Long Stay	Short Stay
Former B1 business offices	108,872	1 space per 75 sqm (GEA) **1,452**	First 5ksqm=1 spaces per 500sqm; thereafter 1 space per 5k sqm (GEA) **31**
Café (Class Ea),restaurant and drinking establishment	1,063	1 space per 175 sqm (GEA) **7**	1 space per 20sqm **54**
Former A2 -A5 Retail / Café (Class Ea) / E(b)) 205 sqm;	134	1 space per 175 sqm (GEA) **1**	areas with higher cycle parking standards: 1 space per 20 sqm (GEA) **3**
Learning and non-residential institution	644	1 space per 8 FTE staff **2**	1 space per 100 sqm (GEA) **7**
Sui Generis (SG) (close to former SG-D2 sports hall swimming gym)	501	1 space per 8 FTE staff **1**	1 space per 100 sqm (GEA) **6**
Total	**111,179**	**1,463**	**101**

Table 1.6 Cycle parking provision

542. The location of the long cycle parking and facilities is across four basement levels with two lifts and dedicated stairs to ensure access at each level. The proposed long stay cycle parking by type is: 146 Sheffield stands (10%); 1,098 two tier racks (75%); 146 locker type (10%) and 73 accessible spaces (5%).

543. It is recommended that some of the cycle parking spaces to be made larger for the cargo bikes, facilitating the deliveries/servicing. The full details would be secured by condition.

544. The location of the short stay cycle parking is proposed at the B1 level facilitating the office use. 44 spaces are located at the B1 level for visitors, who will gain access through barcode given by the facility management, 30 of the cycle parking spaces are scattered on the ground level with easy access from the street, leaving with a shortfall of 27 spaces which are proposed to be provided on the public highway as part of the s278 agreement. Due to the limited availability within the public highway, the applicant is instead required to provide a contribution towards cycle infrastructure.

545. The applicant proposed a dropped kerb on Houndsditch to provide step-free access to the cycle storage facilities, which will be considered as part of the

s278 works. Nevertheless, cyclists are expected to dismount on-street for safety reasons in order to minimise conflicts with pedestrians, thus do not require dropped kerb to reach cycle facilities.

546. Cycle parking facilities are provided in this proposal with the total of 1,463 lockers and 147 showers, in line with the London Plan requirements. The entrances and lifts used by cyclists must be large enough to ensure that cyclists can be fully accommodated. Full details would be secured by condition to ensure that facilities comply with the LCDS standards.

547. Further details are required to understand cyclists journey from entering this development to the areas dedicated for cycle parking. There was limited information on the how visitors are able to access the spaces provided and how the developer is proposing to encourage they come using cycling as a mode of transport. Nevertheless, such details to be covered and part of the Travel Plan (TP), part 2, promoting cycle parking and its facilities. The TP Cycle Promotion Plan to contain initiatives in form of the action plan with SMART targets. The targets for the cycle parking to be agreed with the CoL and are expected to be achieved within the 5 years. The applicant is required to submit the annual report for review, as part of the TP secured via the S106 agreement.

Car Parking

548. The existing site does not have off-street parking spaces or vehicular access.

549. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. The disabled persons parking for Blue Badge holders must be provided in accordance with, Policy T6.5 for Non-residential elements of the development. The policy indicates the levels of provisions to be in accordance with the Table 10.6, to ensure that all non-residential parts of a development provide access to at least one, on or off-street, disabled parking bay. A car-free development has no standard parking but must provide parking for the disabled people.

550. This proposal is car free development with two disabled car parking spaces on the ground level within the service yard, accessed through Houndsditch, and available after 7AM until 7PM. Some flexibility beyond 7PM was factored in, for example, if an employee requires the use of a parking space until 11PM. This arrangement will be managed by the building management company who will adjust the bookings of the deliveries to take place from 11PM till 7AM. The full details of the management of these spaces would be secured via Accessible Car Parking Space Management plan which is secured via the S106 agreement.

551. The proposed ground floor plan, ref 1864 -FPA-XX-GF-DR-A-16108, shows the location of the two disabled car parking spaces, with additional 1.2-meter

strip on two sides to ensure that disabled drivers can get in and out of the car easily.

552. Swept path analysis for the parking bays was carried out and presented within the transport assessment, drawing ref:22-166-T-037 rev E. The analysis has shown that vehicles can drive in and out in forward gear.

553. The management company will monitor the demand for blue badge car parking spaces through a record of those tenants that are Blue Badge holders. Blue Badge spaces will be identifiable through the introduction of appropriate signage. Any parking outside of designated bays, or without valid permit / Blue Badge, will be enforced by the on-site management team.

554. On Houndsditch there are four parking bays, which are pay-by-phone allowing a maximum stay of four hours, with no returns within one hour. In addition, there are two existing disabled parking bays located adjacent to 70 St Mary Axe. The current demand and occupancy levels for spaces mentioned was not surveyed.

555. Vehicle access is proposed from Houndsditch to facilitate disabled parking and activities related to deliveries, servicing, waste, and recycling. To accommodate the new vehicle access and site layout, one on-street car parking space is proposed to be removed and reallocated, along with the e-scooter and e-cycle hire parking bay.

556. It is likely that parking demand on public streets nearby will increase as a result of this development. A proposal with two disabled parking spaces for a mixed-use development, fulfils the policy requirement for the disabled parking, and on-street parking may not be suitable for some staff/and or visitors of this development, due to restrictions on the use of the Blue/Red badge permits.

557. Having accepted that the demand for disabled car parking coming from this development is not known until full occupation, and that it can vary considerably during days/months/years, in order to bring this proposal fully in line with the adopted policies a Travel Plan (TP) is required and recommended to be secured through the s106 Agreement.

558. The first principle of TP is to support disabled people (staff and visitors) of this development through different measures, in order to make to make this development inclusive. Each disabled staff to have a tailored travel plan when they join any occupiers of this development, followed by supporting them on how to get to/from work with different initiatives.

559. Similarly, disabled visitors of this development could request support to get to/and from this site, if the public transport is lacking to meet their needs. Not

all nearby underground stations have step-free access, which means that some users of this development may require additional support. Measures such as arranging a pick-up from a nearby underground station with step free access, or pre-arranged locations must be considered and could form part of travel plan measures to support the disabled people.

560. The applicant is required to keep records and manage the demand for the disabled car parking spaces. In addition, details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses included in this development, will form part of the TP. The action plan with initiatives is to be submitted for review to the LPA annually.

Refuse/Recycling Strategy

561. 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. For proposals near residential areas, further restrictions are applicable, for example during evenings and early morning hours.

562. The existing servicing arrangement is currently carried out on-street at Camomile Street and Houndsditch.

563. The servicing strategy is to carry out the deliveries and servicing within the service yard, also known as the flexible servicing area. The servicing times are to occur during overnight hours between 7pm to 7am when accessible parking is not available for use. Some flexibility was allowed to park until 11pm in such case, facilities management will review and re-arrange booking slots. It is highlighted and as discussed in the Noise and Vibration section of this report, as to protect neighbouring amenity refuse collection including glass would need to take place between 8pm and 11pm.

564. Swept paths showing movements for vehicles up to 8m associated with refuse/recycling are included on the TA, appendix B. Drawing Reference: 22-166-T-025 Rev D.

565. To ensure refuse/recycling collections do not conflict with delivery/ servicing activities, it is recommended that timings of the collections become part of the system that is managing the delivery/ servicing slots, therefore include in the S106 DSMP. Facilities Management can allocate available slots to each land use and review timings to suit different land users. This ensures that such activities are managed and are not done on the public highway and are not in conflict with deliveries and servicing.

Oversailing

566. Structures that permanently oversail the public highway must be licensed by the City of London Highway Authority, in accordance with Section 177 of the Highways Act 1980.

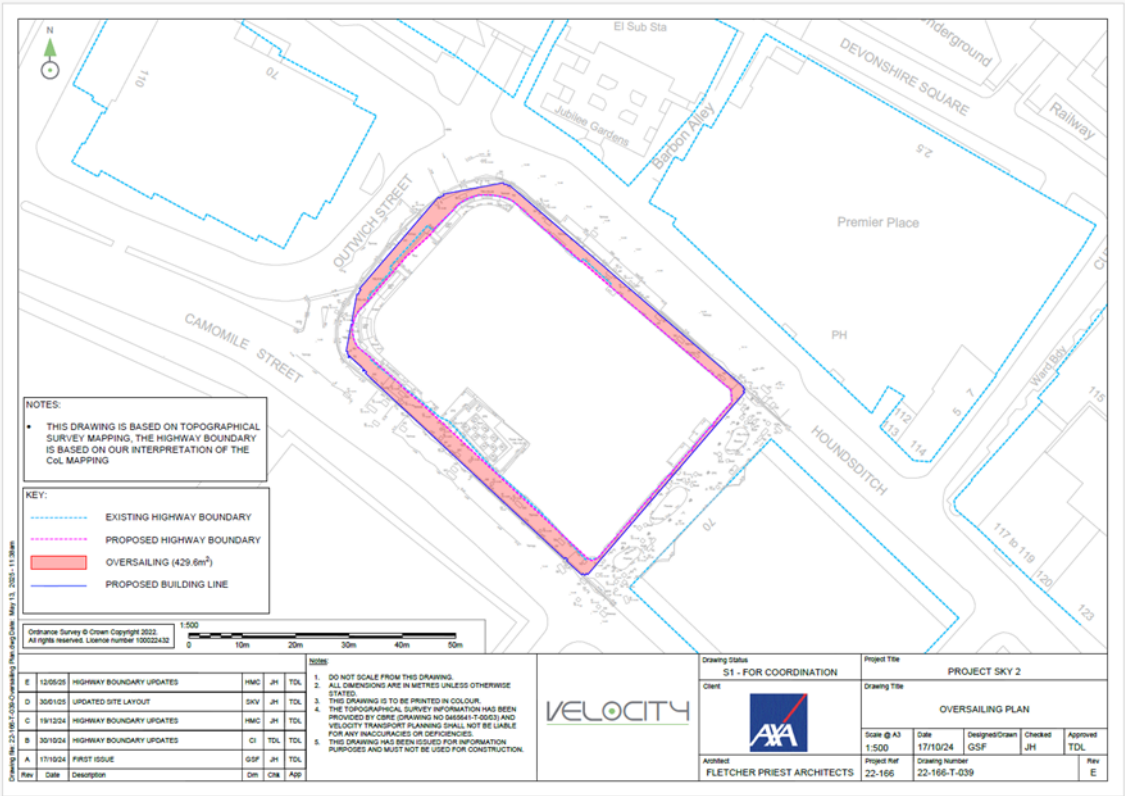
567. The proposed development proposes to oversail the street-level public realm in several locations around the building, drawing numbers:

- 1864-FPA-XX-XX-DR-A-22100 entitled 'Highway Sections Outwich Street Section AA';
- 1864-FPA-XX-XX-DR-A-22101 entitled 'Highway Sections St Mary Axe Section BB';
- 1864-FPA-XX-XX-DR-A-22102 entitled 'Highway Sections Camomile Street Section CC';
- 1864-FPA-XX-XX-DR-A-22103 entitled 'Highway Sections Houndsditch Street Section DD',

illustrates the highway cross-sections that will oversail the public highway.

568. The total area of the proposed oversail is 429.6m2 at oversailing height of 20.6m, and a maximum oversailing projection between 1.4m and 3.6m throughout the building design in Houndsditch, Outwich and Camomile Street sections. There are minimal oversail projection of 0.6m of the building facade on St Mary Axe.

569. Drawing number 22-166-T-039 Rev E entitled 'Oversailing Plan' has been prepared to illustrate the proposed oversailing area shade in pink.



570. Should planning permission be granted, an Approval In Principle (AIP) would be required. The AIP is a construction compliance certificate for all highway structures.

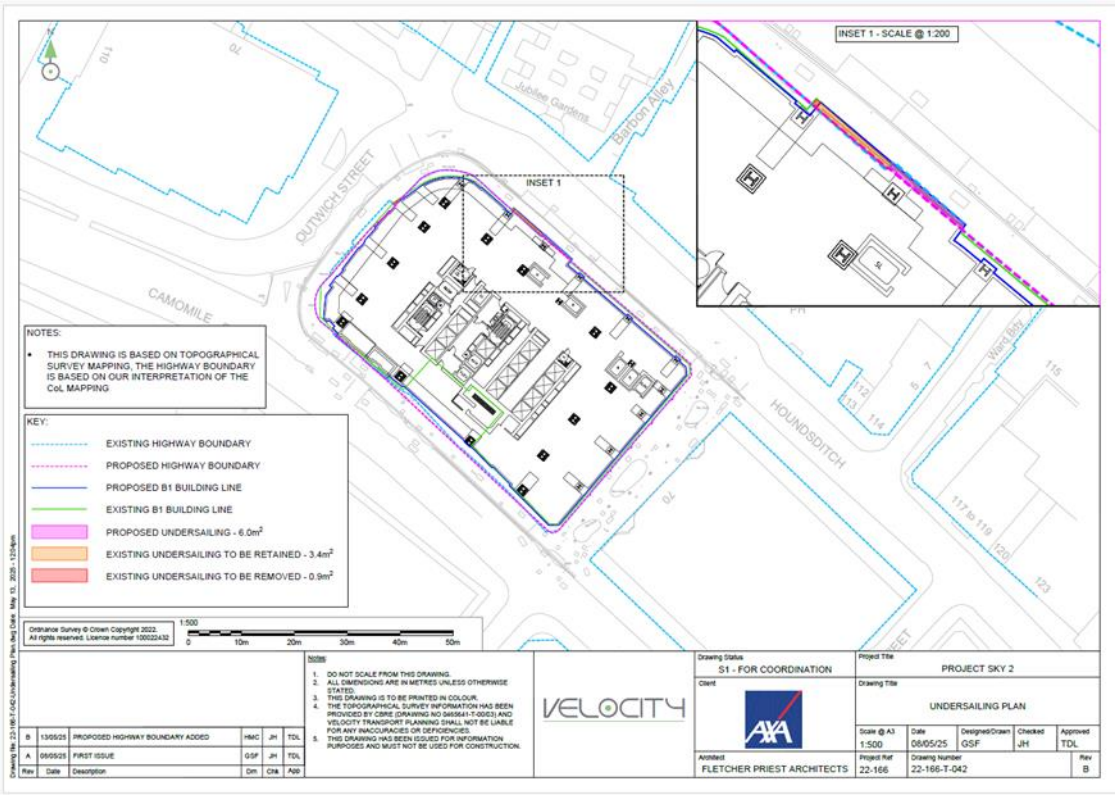
571. The details of the oversail are to be discharged through a planning condition however, the initial proposals are considered acceptable in principle.

Undersail

572. Structures that permanently undersail below the public highway must be licensed by the local highway authority, typically in accordance with Section 179 of the Highways Act 1980.

573. The proposed development proposes undersail the public highway.

574. Drawing number 22-166-T-042 Rev B entitled ‘Undersailing Plan’ has been prepared to illustrate the proposed undersailing.



575. The total area of the proposed undersail is 6.0m2, shaded in pink. The existing undersail area to remain is 3.4 m2, shaded in orange. The total area of the existing undersail to be removed is 0.9m2, shaded in red.

576. Should planning permission be granted, an Approval In Principle (AIP) would be required. The AIP is a construction compliance certificate for all highway structures.

577. The details of the undersail are to be discharged through a planning condition however, the initial proposals are considered acceptable in principle.

Highway Boundary- Stopping Up and Adoption

578. 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.

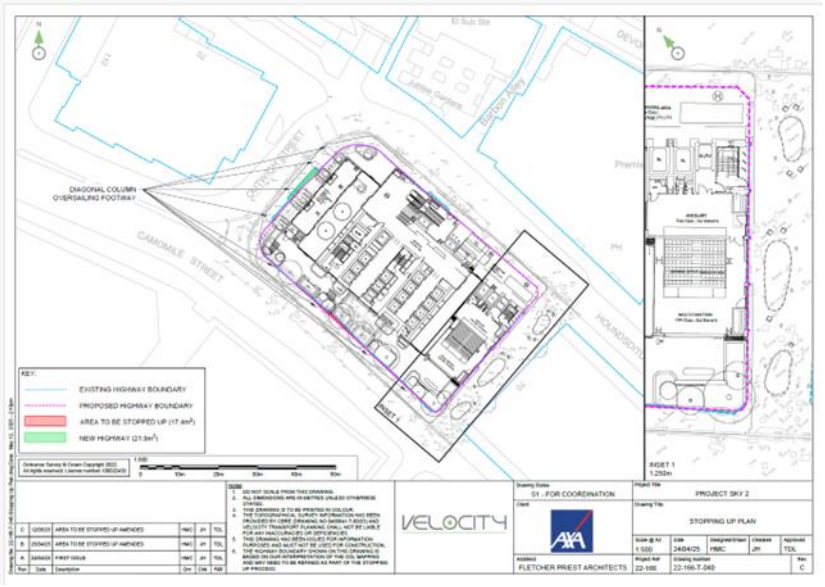
579. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway

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.

580. 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.

581. As a result of the proposals, sections of the highways within Camomile Street will need to be stopped up, and private areas within Outwich Street adopted, under a Section 38 Agreement of the Highway Act 1980.

582. The area to be stopped up is 17.4m2 and to be adopted 21.9m2. Drawing number 22-166-T-040 Rev C entitled 'Stopping Up' has been prepared to show the proposed area to be stopped up in red shading, and the proposed new highway area in green shading.



583. It is noted that this plan is preliminary and will be subject to further refinement and consultation with the City if planning approval is granted.

584. The process to formalise stopping up orders can only be made at the appropriate point. It is the view of offices that the plans are considered acceptable in principle at this stage.

Highways Works – Section 278/38 Agreements

585. The London Wall corridor is a busy east-west route running across the eastern to central part of the City. It also forms part of a proposed cycle route under the Transport Strategy.

586. This busy transport corridor carries a high volume of traffic, which has resulted in a poor environment for people walking, wheeling, cycling, and using the public realm.

587. There are several developments planned or currently taking place close to or along this corridor. Some of these developments will or are likely to require highway improvements as a condition of planning permissions or through separate agreements for improvement with building owners.

588. Monitoring and surveys have shown that the number of motorised vehicles is decreasing in line with targets, now nearly a third of what it was in 1999. Meanwhile, footfall has increased, and walking, wheeling and cycling now account for three-quarters of observed travel activity.

589. Given this context, a holistic approach is needed to ensure that highway and public realm improvements associated with nearby developments and other projects along the corridor are fully integrated with development proposals and aligned with future aspirations for the wider area.

590. This development falls within the scope of the above proposals, and its Section 278/106 Agreements for highway improvement works will contribute to the delivery of the London Wall Corridor Scheme, LWCS, project, providing an accessible area for walking, cycling, and wheeling.

591. There will be an agreed contribution between the developer of the building and the City of London Corporation for any works being proposed for the London Wall Corridor (LWC) project, and not limited to, as well as any improvements deemed necessary to be carried out to benefit the area.

592. The scope of the Section 278 works will include (but not limited to):

<u>Outwich Street/Houndsditch</u>

- Reconstruction of the footways adjacent to the planning application
- Resurfacing of the carriageways adjacent to the planning application
- Renewing of road markings and associated traffic orders
- Improvements to the existing pedestrian crossing to suit the new site layout
- Reviewing the existing parking arrangement to suit new site layout and associated traffic orders

<u>Camomile Street</u>

- Reconstruction of the footways adjacent to the planning application
- Resurfacing of the carriageways adjacent to the planning application
- Renewing of road markings and associated traffic orders

593. The Section 278/38 of the Highways Act 1998 will be secured as part of the Section 106 Agreement as an obligation.

594. In addition to the above, this development proposes a Section 106 Highway Contribution to secure funding for the LWCS, including but not limited to improvements within the area, even if delivered under a different scheme.

Demolition/Construction Logistics Plan (CLP)

595. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.

596. Policy D16.1 of the Local Plan supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1 state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.

597. Although an outline document was submitted, CLP- detailed plan to be developed in accordance with TfL guidance and the latest standards once a Principal Contractor has been appointed. The submitted document must comply with measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines. The detailed plan to show how construction vehicles will be managed during the demolition and construction phase, and in line with the principles of three Rs, that is, Reduce, Re-time and Re-mode.

Conclusion

598. 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.

599. Should planning permission be granted the following conditions and planning obligations along with the Section 278 and Section 38 to be secured:

- A planning condition requiring the provision of 1,463 long stay cycle parking spaces, 101 short stay cycle parking for the entire development, designed 317 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 with a cycle promotion plan. 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.

600. 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.

601. 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. It accords with The London Plan 2021 Policies T1, T2, T3, T4, T5, T6 and T7. As such, the proposals are considered acceptable in transport terms.

Environmental Impacts of Proposals on Surrounding Area

602. Local Plan policy DM10.1 requires that all developments be of a high standard of design by ensuring that (amongst other things) the design, and materials avoid unacceptable wind impacts at street level or intrusive solar glare effects on the surrounding townscape and public realm. Policy DM10.1 also provides that the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby

dwellings and open spaces to unacceptable levels. Emerging City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort. London Plan policy D6D provides that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. London Plan policy D8G requires consideration to be given to the local microclimate created by buildings and the impact of service entrances and facades on the public realm. Addressing environmental impacts in terms of wind, daylight, sunlight, penetration and temperature conditions around tall buildings is also a requirement of London Plan policy D9C(3)(a).

Wind Microclimate

603. 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.

604. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and buildings entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

605. A separate safety criterion is also applied to ascertain if there any safety risks to pedestrians or cyclists.

606. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as result of development. If wind conditions become windier but remain in a category suitable for the intended use, or if there is a negligible or beneficial effect, winds mitigation is not required.

607. The wind tunnel testing and CFD results broadly give the same assessment results. However, variance can occur as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

608. 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.

609. The City of London Lawson criteria defines the safety limit as once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.

610. There are four criteria for determining the sensitivity of a receptor:
- High: seating areas, entrances and terraces
- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian activity

611. There are also four criteria for determining the magnitude of change/impact to a receptor:
- Large: safety exceedance
- Medium: two categories above the criteria
- Small: one category above the criteria
- Negligible: within suitable criteria

612. The City of London Lawson Comfort Criteria are as follows:
- Frequent sitting
- Occasional sitting
- Standing
- Walking
- Uncomfortable

613. Assessments have been carried out for both the windiest and the summer season. It is noted that certain areas are more likely to be more frequently used in the summer, this includes amenity areas, public outdoor seating areas and café seating. It is noted that if an area is classified as suitable for occasional sitting in the summer, the windier conditions that occur during the winter season usually mean that the area would be classified as suitable for standing in the windiest season, unless additional shelter was provided. This is considered to be tolerable on the basis that such an area would be most frequently used for sitting during the summer months. At other times of the year, the expectation of usability is lower due to other factors such as temperature and precipitation

614. The wind microclimate across the site was tested for the following eight configurations:

- Configuration 1: The existing Site with existing surrounding buildings (the baseline);
- Configuration 2: The Proposed Development with the existing surrounding buildings (without mitigation);
- Configuration 3: The Proposed Development with existing surrounding buildings, proposed on-site landscaping and wind mitigation measures;
- Configuration 4: The existing Site with Tier 1 (consented) cumulative schemes (Future Baseline);
- Configuration 5: The Proposed Development with Tier 1 (consented) cumulative schemes (without mitigation);
- Configuration 6: The Proposed Development with Tier 1 (consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures;
- Configuration 7: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes (without mitigation measures); and
- Configuration 8: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures.

615. Tier 1 schemes are schemes that have a planning consent or a resolution to grant and Tier 2 schemes are all the schemes in Tier 1 and all schemes submitted and pending determination. The table below sets out the schemes included in the Baseline and each of the Tiers.

Developments under construction considered as part of the Baseline • 6-8 Bishopsgate (17/00447/FULEIA) • One Leadenhall Court (18/00740/FULEIA) • 40 Leadenhall Street (13/01004/FULEIA)
Tier 1 Schemes • 1-14 Liverpool Street and 11-12 Blomfield Street (21/00726/FULEIA) • 1 Undershaft (16/00075/FULEIA) • 100 Leadenhall Street (18/00152/FULEIA) • 123 Houndsditch (21/00622/FULEIA) • Bevis Marks House (17/00330/FULMAJ) • 1-27 The Arcade Liverpool Street (22/00443/FULL) • 55 Bishopsgate (22/00981/FULEIA) • 55 Old Broad Street (23/00469/FULEIA) • 75 London Wall (23/01270/FULMAJ)
Tier 2 Schemes (plus the schemes in Tier 1) • All schemes in Tier 1 • 1 Undershaft (23/01423/FULEIA) • Bury House (24/00021/FULEIA)

- Liverpool Street Station (23/00453/FULEIA)
- 99 Bishopsgate (24/00836/FULEIA

616. The table above shows that Bury House (24/00021/FULEIA) was included in the Tier 2 schemes, the Environmental Statement in Chapter 2 sets out prior to the submission of this application, application 24/00021/FULEIA received a resolution to refuse. The Wind Assessments within the Environmental Statement considered the scheme at Bury House and that the conclusions of the cumulative assessments would remain valid if the Bury House scheme did not come forward.

617. It is highlighted that the walkways on the levels 1 to 3 and 'bastion' style terraces on level 4 of the proposed development could only be tested in the CFD analysis due to the limitations of instrument placing in the wind tunnel testing due to the width of the walkway areas.

Configuration 1: The existing Site with existing surrounding buildings (the baseline)

Safety Criteria

618. The wind tunnel testing evidenced instances of strong winds that exceed safety criteria, posing a risk to pedestrians and cyclists, at the following locations:
- Within the roadway of Camomile Street (two locations within the roadway)
- Within the Houndsditch thoroughfare

619. The CFD analysis evidenced instances of strong winds that exceed the safety criteria at the following locations:
- At the junction of Wormwood Street, Bishopsgate and Camomile Street
- Southwest corner of 100 Bishopsgate
- On the terrace of the Pan Pacific Hotel

Pedestrian Comfort

620. Overall, the wind tunnel testing demonstrates that conditions range between being suitable for occasional sitting, standing, walking and uncomfortable in the windiest season. In the summer, conditions are generally improved as they are suitable for frequent sitting, occasional sitting and walking. The conditions are windier to the west of the site on Camomile Street and Outwich Street, and calmer to the east on Bevis Marks, Houndsditch and St Mary Axe. The windiest conditions are recorded on Camomile Street, near the junction with Bishopsgate. Overall, the conditions identified in the CFD analysis align closely with the wind tunnel testing.

Thoroughfares

621. The wind tunnel testing demonstrates that all off-site thoroughfares range between being two categories calmer, one category calmer or satisfying the target condition in the windiest season, as they range between being suitable for occasional sitting, standing and walking, so therefore are suitable for their intended use. The CFD analysis shows similar results to the wind tunnel testing with throughfares being suitable for walking, standing and occasional sitting in the windiest season as such ranging between satisfying the target condition and being one and two categories calmer.

Entrances

622. The wind tunnel demonstrates in the windiest season, all off-site entrances would either be suitable for occasional sitting or standing so are either one category calmer than the target condition or satisfying the target condition, so are suitable for their intended use. The CFD analysis shows similar results to the wind tunnel testing with entrances being suitable for standing and occasional sitting in the windiest season, so either satisfy the target condition or are one category calmer than the target condition.

Bus Stops

623. The wind tunnel testing demonstrates in the windiest season, all bus stops are suitable for standing so satisfies the target condition and are therefore suitable for their intended use. The CFD analysis similarly shows that bus stops would be suitable for their intended use in the windiest season.

Pedestrian Crossings

624. The wind tunnel testing demonstrates in the windiest season, all pedestrian crossings are suitable for standing or walking which is either one category calmer than the target condition or satisfying the target condition and therefore suitable for their intended use. The CFD analysis shows that the pedestrian crossings would be suitable for their intended use.

Mixed Use Ground Level Amenity (off-site)

625. The wind tunnel testing demonstrates that Jubilee Gardens which are situated to the north of the site is suitable for occasional sitting in both the windiest season and summer and therefore satisfies the target condition. The results from the CFD analysis are consistent with the wind tunnel testing for both the windiest season and the summer.

626. The mixed amenity space by 100 Bishopsgate to the southwest of the site is suitable for standing in both the windiest season and summer and is therefore one category windier than the target condition. The results from the CFD

analysis are consistent with the wind tunnel testing for both the windiest season and the summer.

Benches (off-site)

627. The benches in Bishopsgate Plaza to the northwest of the site are suitable for standing in both the windiest season and the summer and are therefore one category windier than the target condition. The CFD analysis shows that they would be suitable for standing in both the windiest season and the summer and are therefore one category windier than the target condition.

628. The wind tunnel testing demonstrates that the benches within Jubilee Gardens, in the windiest season are suitable for standing or occasional sitting, therefore ranging between being one category windier than the target condition and meeting the target condition. In the summer, they would be suitable for occasional sitting and therefore being suitable for the target condition. The CFD analysis shows that they would be suitable for occasional sitting in both the windiest season and the summer, satisfying the target condition.

Cafe Style Seating (off-site)

629. The wind tunnel testing demonstrates that the cafe style seating situated by 110 Bishopsgate to the west of the site is suitable for standing in the windiest season, which is two categories windier than the target condition. In the summer, this seating would be suitable for a mix of standing and occasional sitting, which ranges between being one and two categories windier than the target condition. The CFD analysis shows that this area would be suitable for standing in both the windiest season and the summer, which is two categories windier than the target condition.

630. The wind tunnel testing demonstrates that the cafe style seating by 22 Bevis Marks to the east of the application site would be suitable for occasional sitting in both the windiest season and summer and is therefore one category windier than the target condition. The results from the CFD analysis are consistent with the wind tunnel testing for both the windiest season and the summer.

631. The wind tunnel testing demonstrates that the cafe style seating at 70 St Mary Axe to the immediate east of site is suitable for occasional sitting in both the windiest season and summer and is therefore one category windier than the target condition. The results from the CFD analysis are consistent with the wind tunnel testing for both the windiest season and the summer.

632. The wind tunnel testing demonstrates that the cafe style seating at 123 Houndsditch to the northeast of the site is suitable for standing in the windiest season, therefore two categories windier than the target condition. In the

summer, this would be suitable for occasional sitting and therefore one category windier than the target condition. The CFD analysis shows that this would be suitable for occasional sitting in the windiest season and the summer, which would be one category windier than the target condition.

Terrace Level Amenity (off-site)

633. The wind tunnel testing demonstrates that the roof terrace at 100 Bishopsgate to the southwest of the site is suitable for standing in both the windiest season and the summer and is therefore one category windier than the target condition. The CFD analysis shows that in the windiest season this is primarily suitable for standing with instances of walking and occasional sitting, ranging between being one and two categories windier than the target condition and satisfying the target condition. In the summer, the terrace would primarily be suitable for standing and with instances of occasional sitting, ranging between being one category windier than the target condition and satisfying the target condition.

634. The wind tunnel testing demonstrates that the roof terrace(s) at Bishopsgate Plaza to the northwest of the site are suitable for standing and walking in the windiest season, this ranges between being one and two categories windier than the target condition. In the summer, they would be suitable for standing, therefore one category windier than the target condition. The CFD analysis shows that in the windiest season, the terrace(s) would range between being uncomfortable, and suitable for walking and standing and in the summer, the extent of uncomfortable is reduced, ranging between being one, two and three categories windier than the target condition.

635. The wind tunnel testing demonstrates that the roof terrace(s) at 2 Devonshire Square to the north of the site are suitable for occasional sitting in both the windiest season and the summer and therefore satisfies the target condition. The CFD analysis shows that the terrace(s) would be suitable for a mix of standing and occasional sitting in the windiest season and in the summer the extent of standing would be reduced, ranging between being one category windier than the target condition and satisfying the target condition.

Demolition and Construction Effects

636. It is expected that wind conditions during demolition would be suitable for a working construction site and pedestrian thoroughfares around the site (with hoarding in place). Therefore, the likely effect is expected to be Negligible (not significant), and no specific wind microclimate mitigation or management procedures are considered necessary during demolition.

637. As the construction of the Proposed Development progresses, wind conditions at the site would gradually adjust from those of the existing site to those of the completed development. The effects would range from direct, local, short-term

(temporary), Major Beneficial (not significant) to Moderate Adverse (significant) pre mitigation at on and off-site receptor locations.

638. The significant effects which are identified in the 'completed development scenarios' occur at receptors which would not become active until the proposed development is fully operational. As such, these would not cause unsuitable conditions during construction works and all construction wind effects would be Negligible (not significant).

Configuration 2: The Proposed Development with the existing surrounding buildings (without mitigation);

Safety Criteria

639. The wind tunnel testing evidenced that there would be no instances of winds exceeding the safety threshold within the site. This was also evidenced by the CFD analysis.

640. The wind tunnel testing evidenced that the three instances of strong winds that persist in Baseline scenario are eradicated in this Configuration due to the inclusion of the development. This is a Major Beneficial (not significant) wind effect. The CFD analysis demonstrates that the strong winds would be similar to those in the Baseline scenario and that the inclusion of the development would not adversely affect these conditions.

Pedestrian Comfort

641. Overall, the wind tunnel testing demonstrates that conditions range between being suitable for frequent sitting, occasional sitting, standing and walking in all seasons. Conditions are generally consistent with the Baseline but would be windier than the Baseline on Outwich Street immediately to the northwest of the site and on Goring Street to the southeast, and calmer on Camomile Street to the west and Houndsditch to the north. Overall, the conditions identified in the CFD analysis align closely with the wind tunnel testing.

Thoroughfares

642. The wind tunnel testing demonstrates that on-site thoroughfares would range between being one and two categories calmer than the target condition and meeting the target condition in the windiest season, as they range as being suitable for occasional sitting, standing and walking, so therefore suitable for their intended use. The CFD analysis shows that the on-site throughfares would be suitable for frequent sitting and occasional sitting in the windiest season, ranging between two and three categories calmer than the target condition and therefore suitable for their intended use.

643. The wind tunnel testing demonstrates that in respect of off-site thoroughfares some range between being two categories calmer than target condition or satisfying the target condition, these are either consistent with the Baseline (Configuration 1) or calmer than the Baseline. There are some off-site thoroughfares which are windier than in the Baseline, but the conditions would be one category calmer than the target condition or would meet the target condition. All off-site thoroughfares are suitable for the intended use. The CFD analysis demonstrates that off-site thoroughfares would be suitable for walking, standing, occasional sitting and frequent sitting and therefore suitable for their intended use.

Entrances

644. The wind tunnel testing demonstrates that the on-site entrances would be suitable for frequent and occasional sitting in the windiest season; this would be one and two categories calmer than the target condition. The on-site entrances are therefore suitable for their intended use. The CFD analysis shows that the on-site entrances would be suitable for standing and occasional sitting in the windiest season and therefore suitable for their intended use.

645. The wind tunnel testing demonstrates that the majority of off-site entrances are suitable for occasional siting and standing in the windiest season, which would be consistent with the Baseline (Configuration 1), these are either one category calmer than the target condition or would satisfy the target condition. The entrance at 120 Houndsditch would be suitable for standing in the windiest season, whilst this would be one category windier than the Baseline, this would satisfy the target condition. The CFD analysis shows that off-site entrances would be suitable for standing and occasional sitting in the windiest season and therefore suitable for their intended use.

Bus Stops

646. The wind tunnel testing demonstrates that in the windiest season, all bus stops would be suitable standing, this would satisfy the target condition and would be consistent with the Baseline (Configuration 1). The CFD analysis evidenced similar results.

Pedestrian Crossings

647. The wind tunnel testing demonstrates that all pedestrian crossings would either be suitable for standing or walking, this would either be one category calmer than the target condition or would satisfy the target condition and would be consistent with the Baseline. The CFD analysis evidenced similar results.

Mixed Use Ground Level Amenity (off-site)

648. The wind tunnel testing demonstrates that Jubilee Gardens would be suitable for occasional sitting in both the windiest season and summer, this would satisfy the target condition and is consistent with the Baseline. The CFD analysis evidenced similar results.

649. The wind tunnel testing demonstrates that the mixed amenity space by 100 Bishopsgate would be suitable for standing in both the windiest season and summer, this would be one category windier than the target condition but would be consistent with the Baseline. The CFD analysis evidenced similar results.

Benches

650. Benches are proposed on-site within the public realm; the wind tunnel testing demonstrates that these would be suitable for suitable for occasional sitting in the windiest season and would satisfy the target condition. In the summer, the benches would be suitable for either frequent sitting or occasional sitting and would either be one category calmer than the target condition or would satisfy the target condition. The CFD analysis evidenced similar results.

651. The wind tunnel testing demonstrates that the benches in Bishopsgate Plaza would be suitable for standing in both the windiest season and the summer, this is one category windier than the target condition but would be consistent with the Baseline. The CFD analysis evidenced similar results.

652. The wind tunnel testing demonstrates that the benches within Jubilee Gardens in the winter would either be suitable for standing or occasional sitting, this would range between meeting the target condition or being one category windier than the target condition; these conditions are consistent with the Baseline. In the summer, these benches would be suitable for occasional sitting and would satisfy the target condition, this is also consistent with the Baseline. The CFD analysis shows that this would be suitable for occasional sitting in both the windiest season and the summer, consistent with the Baseline.

Café-style seating (off-site)

653. The wind tunnel testing demonstrates that the cafe style seating situated by 110 Bishopsgate would be suitable for occasional sitting and standing in the windiest season, this would range between being one and two categories windier than the target condition; one of the receptors is consistent with the Baseline and the other is improved by one category compared to the Baseline. In the summer, they would be suitable for a mix of occasional sitting and standing, which would be one and two categories windier than the target condition, but this would be consistent with the Baseline. The CFD analysis shows that this area would be suitable for standing in both the windiest season

and the summer, which would be two categories windier than the target condition but would be consistent with the Baseline.

654. The wind tunnel testing demonstrates that the cafe style seating by 22 Bevis Marks to the east of the application site would be suitable for occasional sitting in both the windiest season and the summer, this would be one category windier than the target condition but is consistent with the Baseline. The CFD analysis evidenced similar results.

655. The wind tunnel testing demonstrates that the cafe style seating at 70 St Mary Axe would be suitable for standing in the winter, which would be two categories windier than the target condition; this would also be one category windier than the Baseline; the exceedance would be 1.9% over the 5% target. In the summer, this would be suitable for occasional sitting, which is one category windier than the target condition but is consistent with the Baseline. Whilst it is noted that the conditions would be windier than the Baseline in the windiest season, given the extent of the exceedance, this is not considered to be of a sufficient magnitude that would require mitigation. The CFD analysis evidenced similar results.

656. The wind tunnel testing demonstrates that the cafe style seating at 123 Houndsditch would be suitable for occasional sitting in the windiest season, this is one category windier than the target condition and compared to the Baseline conditions would be improved as they would be one category calmer than in the Baseline. In the summer, these would be suitable for occasional sitting, and this is one category windier than the target condition but would be consistent with the Baseline. The CFD analysis evidenced similar results.

Terraces, Balconies and Walkways

657. The wind tunnel testing demonstrates that the proposed Level 27 and 28 Terraces on the proposed development would be suitable for standing in both the windiest season and the summer, this is one category windier than the target condition. The CFD analysis demonstrates that in the windiest season that the terraces would be suitable for a mix of walking, standing and occasional sitting in the windiest season, with a minor instance of uncomfortable, which range between being one, two and three categories windier than the target condition and satisfying the target condition. In the summer, the CFD analysis shows that conditions would be improved as the suitability for standing and occasional sitting increased, walking reduced and uncomfortable omitted. The Environmental Statement concludes that mitigation would be required, and this is discussed in Configuration 3.

658. Balconies are also proposed on the southeastern and southwestern corners of the proposed development, the wind tunnel testing demonstrates that in the windiest season and summer, these would range between being suitable for frequent sitting, occasional sitting and standing, this would range between

being one category calmer than the target condition, satisfy the target condition and being one category windier than the target condition. The CFD analysis demonstrates that in the windiest season, the suitability of the balconies would range between being uncomfortable, walking, standing, and occasional sitting, ranging between being one, two and three categories windier than the target condition and satisfying the target condition. In the summer, conditions are improved as the instances of standing and occasional sitting are increased, walking reduced and uncomfortable omitted. The Environmental Statement concludes that mitigation would be required, and this is discussed in Configuration 3.

659. On Level 4 a low level 'Bastion' style terraces are proposed; these would be accessible for office occupiers only. As set out above, these terraces could only be tested by the CFD analysis. In the windiest season, these terraces would be suitable for a mix of occasional sitting and standing, ranging between satisfying the target condition and being one category windier than the target condition. In the summer, there would be increased area suitable for occasional sitting compared to the windiest season.

660. A series of publicly accessible walkways are proposed on levels 1 to 3 of the proposed development. As set out above, these walkways could only be tested by the CFD analysis. The CFD analysis shows that in the windiest season the walkways would be suitable for a mix of occasional sitting, standing and walking and in the summer season the extent of the suitability for walking would be reduced. Primarily these are walkways with viewing areas and benches are only proposed in the southwestern corner on level 3. The current CFD analysis shows that the benches would be situated in an area suitable for walking and standing in both the windiest season and the summer. The applicant has highlighted that once hedged planting is introduced that the area would be suitable for occasional sitting. Prior to the benches being installed the applicant would need to demonstrate that they are being in an area that microclimate testing demonstrates is suitable for occasional sitting in the windiest season and the summer, this would be secured by condition.

661. The wind tunnel testing demonstrates that the roof terrace at 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition but is consistent with the Baseline (Configuration 1). The CFD analysis demonstrates that in the windiest season, the terrace is primarily suitable for standing with instances of walking and occasional sitting, ranging between meeting the target condition and being one and two categories windier than the target condition; the categories are consistent with the Baseline (Configuration 1). In the summer, the conditions would primarily be suitable for standing with instances of occasional sitting, ranging between being one category windier than the target condition and satisfying the target condition; the categories are consistent with the Baseline (Configuration 1).

662. The wind tunnel testing demonstrates that the roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season which would range between being one and two categories windier than the target condition, but this would be consistent with the Baseline (Configuration 1). In the summer, they would be suitable for standing which would be one category windier than the target condition, but this would be consistent with the Baseline (Configuration 1). The CFD analysis demonstrates that in the windiest season, the terraces would range between being uncomfortable, walking and standing and in the summer the extent of uncomfortable is reduced, ranging between being one, two and three categories windier than the target condition; the categories are consistent with the Baseline (Configuration 1).

663. The wind tunnel testing demonstrates that the roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and the summer, this would meet the target condition and is consistent with the Baseline (Configuration 1). The CFD analysis shows that the terraces would be suitable for a mix of standing and occasional sitting in the windiest season, and in the summer the extent of standing would be reduced, ranging between satisfying the target condition and being one category windier than the target condition; this is consistent with the Baseline (Configuration 1).

Configuration 3: The Proposed Development with existing surrounding buildings, proposed on-site landscaping and wind mitigation measures

664. Configuration 2 identified that there would be significant wind effects on site that would require mitigation. The proposed mitigation includes:

- The inclusion of proposed landscaping scheme at ground level, terrace level and balcony levels
- The inclusion of 1500mm tall evergreen hedges within the planter on the mid-level terraces
- The inclusion of double height glazed screens up the southwest elevation of the balconies at the western corner of the proposed development, from level 28 to 40.

665. This section focuses only on the areas that require mitigation as all other results are consistent with Configuration 2 discussed above. This scenario was tested in the wind tunnel testing only.

Terraces and Balconies

666. The terraces on Levels 27 and 28 with the inclusions of the landscaping and mitigation would be suitable for standing and occasional sitting in the windiest season, ranging between one category windier than the target condition and satisfying the target condition. In the summer, these terraces would primarily be suitable for occasional sitting with instances of frequent sitting, ranging

between satisfying the target condition and being one category calmer than the target condition.

667. Balconies are also proposed on the southeastern and southwestern corners of the proposed development. In the windiest season these would range between being suitable for standing, occasional sitting and frequent sitting, this would range between being one category windier than the target condition, satisfying the target condition and being one category calmer than the target condition. In summer, these would range between being suitable for occasional sitting and frequent sitting, this would range between satisfying the target condition and being one category calmer than the target condition.

Configuration 4: The existing Site with Tier 1 (consented) cumulative schemes (Future Baseline)

668. This Configuration is the Future Baseline, and this configuration was only tested in the wind tunnel testing.

Safety Criteria

669. The wind tunnel testing evidenced instances of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists, at the following locations:

- Within the roadway of Camomile Street (three locations within the roadway)
- At the pedestrian crossing within Camomile Street

Pedestrian Comfort

670. Overall, the wind tunnel testing demonstrated that conditions are generally of the same level and distribution as for the Baseline (Configuration 1). The windiest conditions recorded (on Camomile Street, near the junction with Bishopsgate) have been made windier by the inclusion of Tier 1 Cumulative Schemes and show a greater extent which is uncomfortable in the windiest season.

Thoroughfares

671. The wind tunnel testing demonstrates that all off-site thoroughfares range between being one and two categories calmer and meeting the target condition in the windiest season, as they would range between being suitable for occasional sitting, standing and walking, so therefore suitable for their intended use. This is consistent with Configuration 1 (Baseline).

Entrances

672. In the windiest season, all off-site entrances would be suitable for standing in the windiest season so would satisfy the target condition and therefore suitable for their intended use. Whilst conditions are windier at some off-site entrances compared to the Baseline, the conditions are suitable for the intended use.

Bus Stops

673. In the windiest season, bus stops would be suitable for standing and this satisfies the target condition and therefore suitable for the intended use. This is consistent with the Baseline.

Pedestrian Crossings

674. In the windiest season, the majority of pedestrian crossings would be suitable for standing, this is one category calmer than the target condition and is suitable for their intended use. The pedestrian crossing to the west of the application site on Camomile Street (probe 28) would be rated as uncomfortable, this is one category windier than the target condition. The conditions at probe 28 on Camomile Street are windier than in the Baseline.

Mixed-use Ground Level Amenity (off-site)

675. Jubilee Gardens would be suitable for occasional sitting in both the windiest season and the summer, this would satisfy the target condition. This is consistent with the Baseline.

676. The mixed-use amenity space by 100 Bishopsgate would be suitable for standing in the windiest season and the summer, this would be one category windier than the target condition. This is consistent with the Baseline.

Benches (off-site)

677. The benches in Bishopsgate Plaza are suitable for standing in both the windiest season and the summer and are therefore one category windier than the target condition. This is consistent with the Baseline.

678. The benches within Jubilee Gardens would be suitable for occasional sitting in the windiest season, satisfying the target condition and in the summer would be suitable for a mix of occasional sitting and frequent sitting, ranging between meeting the target condition and being one category calmer than the target condition. The conditions at some receptors are calmer compared to the Baseline.

Café Style Seating (off-site)

679. The café style seating by 110 Bishopsgate would be suitable for a mix of standing and occasional sitting in the windiest season, which would be one and two categories windier than the target condition. In the summer, they would be suitable for occasional sitting which is one category windier than the target condition. The conditions at some receptors are calmer compared to the Baseline.

680. The café style seating by 22 Bevis Marks would be suitable for occasional sitting in the windiest season, which would be one category windier than the target condition. In the summer, this seating would be suitable for occasional sitting which is one category windier than the target condition. This is consistent with the Baseline.

681. The café style seating at 70 St Mary Axe would be suitable for standing in the windiest season, which would be two categories windier than the target condition. In the summer, this seating would be suitable for occasional sitting, which is one category windier than the target condition. In the windiest season, conditions would be windier than in the Baseline.

682. The café style seating at 123 Houndsditch would be suitable for standing in the windiest season, this would be two categories windier than the target condition and, in the summer, would be suitable for occasional sitting which would be one category windier than the target condition. This is consistent with the Baseline.

Terrace Level Amenity (off-site)

683. The roof terrace at 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, and therefore one category windier than the target condition. This is consistent with the Baseline.

684. The roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season, which would be one and two categories windier than the target condition. In the summer, these would be suitable for standing therefore one category windier than the target condition. The windiest season and summer are consistent with the Baseline.

685. The roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and the summer and would therefore satisfy the target condition. This is consistent with the Baseline.

Configuration 5: The Proposed Development with Tier 1 (consented) cumulative schemes (without mitigation)

Safety Criteria

686. The wind tunnel testing evidenced that there would no instances of winds exceeding the safety threshold within the site. This was also evidenced by the CFD analysis.

687. The Wind Tunnel Testing evidenced that two of the instances of strong winds present in the future baseline scenario (Configuration 4) on Camomile Street (probes 27 and 30) would be eradicated in this scenario. The following instances of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists would be consistent with the Future Baseline:

- Within the roadway of Camomile Street (probe 29)
- At the pedestrian crossing on Camomile Street

688. The CFD analysis evidenced instances of strong winds that the exceed the safety criteria at the following locations and these are consistent with the Baseline Scenario (Configuration 1).

- At the junction of Wormwood Street, Bishopsgate and Camomile Street
- Southwest corner of 100 Bishopsgate
- On the terrace of the Pan Pacific Hotel

Pedestrian Comfort

689. Overall, the wind tunnel testing demonstrated that the conditions would generally be consistent with the Future Baseline (Configuration 4) but would be windier than the Baseline (Configuration 1) on Outwich Street immediately to the northwest of the site and on Goring Street and St Mary Axe to the southeast, and conditions would be calmer on Camomile Street to the west and Houndsditch to the north. The CFD analysis demonstrated that the introduction of the Tier 1 schemes would increase the uncomfortable conditions predicted at the southwest corner of 110 Bishopsgate, compared to Configuration 2, these conditions are caused by the Tier 1 schemes and not the proposed development. The CFD analysis also demonstrates that for off-site locations, the results are similar or calmer than the Baseline Scenario (Configuration 1).

Thoroughfares

690. The wind tunnel testing demonstrates that all on-site thoroughfares would range between being one and two categories calmer than the target conditions in the windiest season, as they range between being suitable for standing and occasional sitting, so therefore suitable for their intended use. The CFD analysis demonstrated similar results to the wind tunnel testing.

691. The wind tunnel testing demonstrates that in respect of off-site throughfares some range between being one and two categories calmer than the target condition or satisfying the target condition, these are either consistent with the Future Baseline (Configuration 4) or calmer than the Future Baseline. There

are some off-site thoroughfares that are windier than in the Future Baseline, but the conditions would either be one category calmer than the target condition or would satisfy the target condition. All off-site thoroughfares are suitable for their intended use. The CFD analysis demonstrated similar results to the wind tunnel testing.

Entrances

692. The wind tunnel testing demonstrates that the on-site entrances would be suitable for frequent sitting in the windiest season this would be two categories calmer than the target condition. The on-site entrances are therefore suitable for their intended use. The CFD analysis demonstrated that on-site entrances would be suitable for occasional sitting and standing and therefore suitable for their intended use.

693. The wind tunnel testing demonstrates that some off-site entrances would be suitable for occasional sitting in the windiest season, which would be one category calmer than the target condition and is also one category calmer than the Future Baseline (Configuration 4). The majority of off-site entrances would be suitable for standing in the windiest season which would satisfy the target condition and is consistent with the Future Baseline. The CFD analysis demonstrated similar results to the wind tunnel testing.

Bus Stops

694. The wind tunnel testing demonstrates that in the windiest season, all bus stops would be suitable for standing which would satisfy the target condition and is consistent with both the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis also demonstrated that the bus stops would be suitable for standing and therefore suitable for the intended use.

Pedestrian Crossings

695. The wind tunnel testing demonstrates that in the windiest season, the majority of pedestrian crossings would be suitable for standing, this is one category calmer than the target condition and is consistent with the Future Baseline (Configuration 4). The pedestrian crossing to west of the application site on Camomile Street, would be suitable for walking which is satisfies the target condition. The CFD analysis demonstrated that most crossings would be suitable for standing in the windiest season which is one category calmer than the intended use. The crossing to the west of the application site on Camomile Street would be suitable for walking, which would satisfy the target condition.

Mixed Use Ground Level Amenity (off-site)

696. The wind tunnel testing demonstrates that Jubilee Gardens would be suitable for occasional sitting in both the windiest season and summer season, this

would satisfy the target condition and would be consistent with the Baseline (Configuration 1) and Future Baseline (Configuration 2). The CFD analysis demonstrates that in the windiest season would be suitable for occasional sitting, satisfying the target condition and in the summer would be suitable for frequent sitting, one category calmer than the target condition.

697. The wind tunnel testing demonstrates that the mixed-use amenity space by 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition, but this would be consistent with the Baseline (Configuration 1) and Future Baseline (Configuration 2). The CFD analysis demonstrated similar results to the wind tunnel testing.

Benches

698. Benches are proposed on site within the public realm; these would be suitable for either frequent sitting or occasional sitting in both the windiest season and the summer. This would either be one category calmer than the target condition or meeting the target condition. The CFD analysis demonstrated similar results.

699. The benches in Bishopsgate Plaza would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to the wind tunnel testing.

700. The benches within Jubilee Gardens would be suitable for standing in the windiest season which would be one category windier than the target condition; this would not be consistent with the Future Baseline (Configuration 4) as conditions would be one category windier. In the summer, the benches would be suitable for occasional sitting, this meets the target condition; it is noted that one of the receptors is windier than in the Future Baseline. The exceedances are 2.3% and 1% respectively. Whilst it is noted that conditions would be windier than the Future Baseline, given the extent of the exceedances and as in the summer the benches would be suitable for occasional sitting, these are not considered to be of a sufficient magnitude that would require mitigation. The CFD analysis demonstrates that the in both the windiest season and the summer the benches would be suitable for occasional sitting, satisfying the target condition.

Café Style Seating (off-site)

701. The café style seating by 110 Bishopsgate would be suitable for a mix of standing and occasional sitting in the windiest season, which would be one and two categories windier than the target condition; this would be consistent

with the Future Baseline (Configuration 4). In the summer, this seating would be suitable for occasional sitting which would be one category windier than the target condition; this would be consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to the wind tunnel testing.

702. The café style seating by 22 Bevis Marks would be suitable for occasional sitting in both the windiest season and the summer, which would be one category windier than the target condition; this would be consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results.

703. The café style seating at 70 St Mary Axe would be suitable for standing in the windiest season, which is two categories windier than the target condition and, in the summer, would be suitable for occasional sitting which would be two categories windier than the target condition. This is consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrates that the seating would be suitable for occasional sitting in both the windiest season and the summer; this would be one category windier than the target condition.

704. The café style seating at 123 Houndsditch would be suitable for standing in the windiest season, which is two categories windier than the target condition and, in the summer, would be suitable for occasional sitting which would be one category windier. This is consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to the wind tunnel testing.

Terraces, Balconies and Walkways

705. The proposed terraces at Levels 27 and 28 of the proposed development would be suitable for a mix of standing and occasional sitting in the windiest season and the summer, which ranges between being suitable for the target condition and being one category windier than the target condition. The CFD analysis demonstrates that in the windiest season, the terraces would be suitable for walking, standing and occasional sitting, ranging between one and two categories windier than the target condition and satisfying the target condition. In the summer, the terraces would mainly be suitable for standing and occasional sitting with very minor instances of being suitable for walking. The Environmental Statement concludes mitigation would be required, and this is discussed in Configuration 6.

706. In the windiest season and summer, the balconies on the southeastern and southwestern corners of the proposed development would be suitable for a mix of standing, occasional sitting and frequent siting, this would range between being one category calmer than the target condition, satisfying the target condition and one category windier than the target condition. The CFD analysis demonstrates that in the windiest season the balconies would be

suitable for a mix of walking, standing and occasional sitting, ranging between being one and two categories windier than the target condition and satisfying the target condition. In the summer, the balconies would be suitable for a mix of standing and occasional sitting, ranging between being one category windier than the target conditions and satisfying the target condition. The Environmental Statement concludes mitigation would be required, and this is discussed in Configuration 6.

707. The 'Bastion' style terraces on Level 4 which are only accessible by officer occupiers, would primarily be suitable for occasional sitting with instances of standing in the windiest season, ranging between satisfying the target condition and being one category windier than the target condition. In the summer, the instances of standing are reduced further, so there would be only a very minor area suitable for standing.

708. In the windiest season the proposed publicly accessible walkways on levels 1 to 3 of the proposed development would be suitable for a mix of occasional sitting, standing and walking and in the summer the extent of occasional sitting is increased and there are no instances of being suitable for walking. Primarily these are walkways with viewing areas and benches are only proposed in with southwestern corner of level 3. Currently, the CFD analysis shows that location of the proposed benches would be suitable for walking and standing in the windiest season and for standing in the summer. The applicant has highlighted that once hedged planting is introduced that the area would be suitable for occasional sitting. Prior to the benches being installed the applicant would need to demonstrate that they are being installed in an area that microclimate testing demonstrates is suitable for occasional sitting in the windiest season and the summer, this would be secured by condition.

709. The roof terrace at 100 Bishopsgate would be suitable standing in both the windiest season and the summer, this would be one category windier than the target condition. This is consistent with both the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis demonstrates that that in the windiest season the terrace would primarily be suitable for standing with instances of occasional sitting, ranging between being one category windier than the target use and satisfying the target condition; the categories are largely consistent with the Baseline (Configuration 1) and Configuration 2, but conditions would be calmer as there are no longer instances of walking. In the summer, the terrace would be suitable for a mix of standing and occasional sitting, these categories are consistent with the Baseline (Configuration 1) and Configuration 2.

710. The roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season, this would range between being one and two categories windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). In the summer, they would be suitable for standing, which is one category windier than the target condition but is consistent with the Baseline (Configuration 1)

and the Future Baseline (Configuration 4). The CFD analysis demonstrates that that in the windiest season, the terrace would range between being uncomfortable, walking and standing and in the summer the extent of uncomfortable in reduced and some instances of occasional sitting are introduced; the categories are consistent with the Baseline (Configuration 1) and Configuration 2.

711. The roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and would therefore satisfy the target condition. The CFD analysis demonstrates that the terrace(s) would be suitable for a mix of standing and occasional sitting in the windiest season, which is consistent with the Baseline (Configuration 1) Configuration 2. Conditions would be slightly calmer in the summer, as some instances of frequent sitting would be introduced.

Configuration 6: The Proposed Development with Tier 1 (consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures

712. Configuration 5 identified that there would be significant effects on site that would require mitigation. The proposed mitigation includes:

- The inclusion of proposed landscaping scheme at ground level, terrace level and balcony levels.
- The inclusion of 1500mm tall evergreen hedges within the planter on the mid-level terraces.

713. It is noted that the double height glazed screens up the southwest elevation of the balconies proposed in Configuration 3 are not required as mitigation in this scenario.

714. This section focuses only on the areas that require mitigation as all other results are consistent with Configuration 5. This scenario was tested in the wind tunnel testing only.

Terraces and Balconies

715. The terraces on Levels 27 and 28 with the inclusion of the proposed mitigation and landscaping would be suitable for standing or occasional sitting in the windiest season, ranging between one category windier than the target condition and satisfying the target condition. In the summer, these terraces would primarily be suitable for occasional sitting with instance of frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition.

716. The balconies on the southeastern and southwestern corners of the proposed development would be suitable for a mix of standing, occasional sitting and

frequent sitting in the windiest season, this would range between being one category windier than the target condition, satisfying the target condition and being one category calmer than the target condition. In the summer, the balconies would be suitable for a mix occasional sitting and frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition.

Configuration 7: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes (without mitigation measures)

Safety Criteria

717. The wind tunnel testing evidenced that there would be no instances of winds exceeding the safety threshold within the site. This was also evidenced by the CFD analysis.

718. The wind tunnel testing evidenced the following instance of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists, this exists in both the Baseline (Configuration 1) and Future Baseline (Configuration 4):
- Within the roadway of Camomile Street (probe 29)

719. The CFD analysis evidenced instances of strong winds that the exceed the safety criteria at the following locations and these are consistent with the Baseline Scenario (Configuration 1):
- At the junction of Wormwood Street, Bishopsgate and Camomile Street
- Southwest corner of 100 Bishopsgate
- On the terrace of the Pan Pacific Hotel

Pedestrian Comfort

720. Overall, the wind tunnel testing demonstrated that conditions would generally be similar to those discussed in Configuration 5. Some locations would be windier than Configuration 5 but where this occurs the conditions would be suitable for the intended use. The CFD analysis demonstrated that the introduction of the Tier 2 Cumulative schemes would result in similar conditions to the CFD analysis results discussed in Configuration 5.

Thoroughfares

721. The wind tunnel testing demonstrates that all on-site thoroughfares would range between being suitable for walking, standing and occasional sitting in the windiest season, and therefore range between satisfying the target condition and being one and two categories calmer than the target condition. It is noted that the introduction of the Tier 2 schemes would result in windier

conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

722. The wind tunnel testing demonstrates that in respect of off-site throughfares range between being suitable for walking, standing and occasional sitting in the windiest season, and therefore range between satisfying the target condition and being one and two categories calmer than the target condition. It is noted that the introduction of the Tier 2 schemes would result in windier conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the use.

Entrances

723. The wind tunnel testing demonstrates that the on-site entrances would be suitable for occasional sitting and frequent sitting in the windiest season, this would range between being one and two categories calmer than the target conditions. It is noted that the introduction of the Tier 2 schemes would result in windier conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

724. The wind tunnel testing demonstrates that the off-site entrances would be suitable for standing or occasional sitting in the windiest season, this would range between satisfying the target condition or being one category calmer than the target condition. It is noted that the introduction of the Tier 2 schemes would result in windier conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Bus Stops

725. The wind tunnel testing demonstrates that in the windiest season, all bus stops would be suitable for standing which would satisfy the target condition and is consistent with the Baseline (Configuration 1) and the Future Baseline

(Configuration 4). The introduction of the Tier 2 schemes does not alter the suitability of the bus stops as the categories are consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Pedestrian Crossings

726. The wind tunnel testing demonstrates that in the windiest season, the majority of pedestrian crossings would be suitable for standing, this is one category calmer than the target condition and is consistent with Future Baseline (Configuration 4). The pedestrian crossing to the west of the application site on Camomile Street would be suitable for waking, this would satisfy the target condition and is one category calmer than the Future Baseline (Configuration 4) and is consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Mixed-use Ground Level Amenity (off-site)

727. The wind tunnel testing demonstrates that Jubilee Gardens would be suitable for occasional sitting in both the windiest season and the summer, this would satisfy the target condition and would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The introduction of the Tier 2 schemes does not alter the suitability of Jubilee Gardens as the category is consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

728. The wind tunnel testing demonstrates that the mixed-use amenity space by 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The introduction of the Tier 2 schemes does not alter the suitability of this amenity space as the category is consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

Benches

729. The benches proposed on site within the public realm would be suitable for occasional sitting in the windiest season, this would satisfy the target condition. In this summer these would be suitable for either occasional sitting or frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition. Whilst the introduction of the

Tier 2 schemes would make conditions windier in the windiest season, the benches would be suitable for their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

730. The wind tunnel testing demonstrates that the benches in Bishopsgate Plaza would be suitable for walking and standing in the windiest season, this ranges between being one and two categories windier than the target conditions. The introduction of the Tier 2 schemes would make the conditions windier at one of the receptors, the exceedance over the standing threshold is 1.6% (this has been compared to standing as this what the receptor achieves in all other configurations); given the extent of the exceedance this is not considered to require mitigation. In the summer, the benches would be suitable for standing in the summer which is one category windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to Configuration 5.

731. The wind tunnel testing demonstrates that the benches within Jubilee Gardens would be suitable for standing in the windiest season which would be one category windier than the target condition; whilst the introduction of the Tier 2 schemes would not make conditions windier as the results would be consistent with Configuration 5, however, the results would not be consistent with the Future Baseline (Configuration 4). The reason for this is due to a degree of downwash from the northern elevation of the development when the wind is from the northeast; the exceedance would be 1.7% and 0.9% over the target, and given the extent is not considered to require mitigation when compared to Configuration 4. In the summer, the benches would be suitable for occasional sitting and would satisfy the target condition. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Café Style Seating

732. The wind tunnel testing demonstrates that the café seating by 110 Bishopsgate would be suitable for a mix of standing and occasional sitting in the windiest season, which would be one and two categories windier than the target condition; this would be consistent with the Future Baseline (Configuration 4) and Configuration 5. In the summer, the seating would be suitable for occasional sitting, which would be one category windier than the target conditions but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

733. The wind tunnel testing demonstrates that the café style seating by 22 Bevis Marks would be suitable for occasional sitting in the windiest season and the summer, which would be one category windier than the target condition. This would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

734. The wind tunnel testing demonstrates that the café style seating at 70 St Mary Axe would be suitable for standing in the windiest season, which would be two categories windier than the target condition; this would be consistent with the Future Baseline (Configuration 4) and Configuration 5. In the summer, the seating would be suitable for occasional sitting which would be one category windier than the target condition but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

735. The wind tunnel testing demonstrates that the café style seating at 123 Houndsditch would be suitable for standing in the windiest season which would be two categories windier than the target condition but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. In the summer, the seating would be suitable for occasional sitting which would be one category windier than the target condition but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

Terraces, Balconies and Walkways

736. The wind tunnel testing demonstrates that the proposed terraces at Levels 27 and 28 of the proposed development would be suitable for a mix of standing and occasional sitting in the windiest season and the summer, which ranges between being one category winder and meeting the target condition. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5. Mitigation is required and this is discussed in Configuration 8.

737. The wind tunnel testing demonstrates that in the windiest season the balconies on the southeastern and southwestern corners of the proposed development would be suitable for a mix of walking, standing, occasional sitting and frequent sitting, this would range between one and two categories windier than the target condition, satisfying the target condition and being one category calmer than the target condition. In the summer, the balconies would be suitable for a mix of standing, occasional sitting and frequent sitting, which ranges between being one category windier than the target condition, satisfying the target condition and being one category calmer than the target condition. The CFD analysis demonstrates that the introduction of the Tier 2

schemes would result in similar results to the CFD analysis results discussed in Configuration 5. Mitigation is required and this is discussed in Configuration 8.

738. The 'Bastion' style terraces on Level 4 which are only accessible by officer occupiers, would primarily be suitable for occasional sitting with instances of standing in the windiest season, ranging between satisfying the target condition and being one category windier than the target condition. In the summer, the instances of standing are reduced further, so there would be only a very minor area suitable for standing.

739. In the windiest season, the proposed publicly accessible walkways on levels 1 to 3 would primarily be suitable for occasional sitting and standing, with a very minor instance of walking and in the summer the instance of occasional sitting would be increased. Primarily these are walkways with viewing areas and benches are only proposed in the southwestern corner of level 3. Currently the CFD analysis shows that the location of the benches would be suitable for walking and standing in the windiest season and standing in the summer. The applicant has highlighted that once hedged planting is introduced that the area would be suitable for occasional sitting. Prior to the benches being installed the applicant would need to demonstrate that they are being in an area that microclimate testing demonstrates is suitable for occasional sitting in the windiest season and the summer, this would be secured by condition.

740. The wind tunnel testing demonstrates that the roof terrace at 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition. This would be consistent with the Baseline (Configuration 1), the Future Baseline (Configuration 2) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

741. The wind tunnel testing demonstrates that the roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season, this range between one and two categories windier than the target condition, this would be consistent with the Baseline (Configuration 1), the Future Baseline (Configuration 4) and Configuration 5. In the summer, they would be suitable for standing and occasional sitting, conditions would range between being one category windier than the target condition and satisfying the target condition. The standing condition are consistent with the Baseline (Configuration 1), the Future Baseline (Configuration 4) and Configuration 5 and the occasional sitting would be an improvement of conditions. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

742. The wind tunnel testing demonstrates that the roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and summer and would therefore satisfy the target condition. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

Configuration 8: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures

743. The wind tunnel testing evidenced instances of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists, at the following location:

- A crossing on Camomile Street (probe 28)
- Within the roadway of Camomile Street (probe 29)

744. It is noted that in Configuration 7, probe 28 for the crossing on Camomile Street was recorded as an exceedance, the difference is due a slight change in wind speed. It is highlighted that both Configurations 7 and 8 are improvements compared to the Future Baseline (Configuration 4).

745. Configuration 7 identified that there would be significant effects on site that would require mitigation. The proposed mitigation includes:

- The inclusion of proposed landscaping scheme at ground level, terrace level and balcony levels.
- The inclusion of 1500mm tall evergreen hedges within the planter on the mid-level terraces.

746. This section focuses only on the areas that require mitigation as all other results are consistent with Configuration 7. This scenario was tested in the wind tunnel testing only.

Terraces and Balconies

747. The terraces on Levels 27 and 28 with the inclusion of the mitigation and landscaping would be suitable for standing or occasional sitting in the windiest season, ranging between being one category windier than the target condition and satisfying the target condition. In the summer, these terraces would primarily be suitable for occasional sitting with instance of frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition.

748. The balconies on the southeastern and southwestern corners of the development would be suitable for a mix of standing, occasional sitting and frequent sitting in the windiest season, ranging between being one category windier than the target condition, satisfying the target condition and being one

category calmer than the target condition. In the summer, the balconies would be suitable for a mix of occasional sitting and frequent sitting, ranging between satisfying the target condition and being one category windier than the target condition.

Wind Microclimate Conclusion

749. In terms of safety, the introduction of the proposed development does not result in any new safety exceedances or make any existing safety exceedances worse in any of the configurations.

750. In terms of suitability for the proposed uses on-site, the ground level uses are suitable for their intended uses. The proposed public walkways are generally suitable for their intended use and conditions would ensure that the proposed benches are sited in locations suitable for occasional sitting. Even with the introduction of the proposed mitigation and landscaping, not all areas of the proposed balconies and terraces would be suitable for at least occasional sitting in the windiest season. It is acknowledged that the balconies and terraces would be suitable for the intended use in the summer. Given that the balconies and terraces are private, and access can be restricted when conditions are unfavourable, this is acceptable.

751. In terms of the off-site receptors, nearly all receptors in all configurations are either consistent or calmer than either the Baseline or Future Baseline. There are some receptors that have slightly windier conditions than either the Baseline or Future Baseline but due to the extent of the exceedance, they would not require mitigation. It is noted that some conditions are windier with the introduction with the Cumulative Schemes (Tier 1 and/or Tier 2), and these windier conditions are not caused by the proposed development, rather they are caused by the cumulative schemes.

752. Overall, the wind microclimate impact of the proposed development with the proposed mitigation and landscaping is considered acceptable. The proposed development has taken measures to mitigate any significant effects and does not worsen any existing safety exceedances in the surrounding area.

753. A Wind Audit would be secured within 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 Testing against the results of wind speed assessments carried out in the vicinity of the application site over a specified period, to identify if the completed development has material adverse impacts not identified in the Environmental Statement.

754. It is considered that subject to conditions, the microclimate in and around the site, with regard to wind conditions, would be acceptable and in accordance with London Plan policies S8, D8 (G), D9 C (3)(a), Local Plan 2015 policy DM10.1 and emerging City Plan policies S8 and DE2 and the guidance

contained within the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight and Overshadowing

Policy and Context

755. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

756. Local Plan policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

757. Emerging City Plan 2040 policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking into account of the BRE guidelines.

758. Paragraph 3.10.41 of the Local Plan 2015 indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the emerging City Plan 2040 stats when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of the development proposals.

759. The BRE guidelines 'Site layout planning for daylight and sunlight- A guide to good practice' (2022) present the following methodologies for measing the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where 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 livening 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

760. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionally a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-29.9% it is judged to be minor adverse, 30-39.9% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

761. Overshadowing of amenity spaces is measured using transient overshadowing and sunlight hours on ground. The BRE guidelines recommends that the availability for open spaces including residential gardens and public amenity spaces.

Daylight and Sunlight Assessment

762. An assessment of the impact of the development on daylight and sunlight to the surrounding residential buildings and public amenity spaces has been undertaken by GIA in accordance with the BRE Guidelines and 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. 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.

763. When referring to the degree of impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Impact Statement when describing the degree or extent of adverse impacts. Officers agree with the 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 sensitive receptors 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).

764. 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 the site 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 basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial 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.

765. The buildings (incl. residential, religious and hotels) to be considered are:

- One Bishopsgate Plaza, 80 Houndsditch (including the Pan Pacific Hotel and Sky Residences)
- 16 New Street (residential)
- 26 Wormwood Street (residential)
- 25 Wormwood Street (residential)
- 10 Wormwood Street (residential)
- St Botolph Without Bishopsgate (religious)

766. The buildings set out above are considered in the Environmental Statement. In addition to the properties considered in the Environmental Statement, results were presented outside of the Environmental Statement for the Bevis Mark Synagogue (religious) and Petticoat Square, Middlesex Estate (residential). These buildings were not presented in the Environmental

Statement due to their distance from the application site, however GIA have undertaken an assessment for completeness.

767. In respect of Bevis Mark Synagogue, which is located approximately 120m southwest from the site, a total of 23 windows serving two rooms were assessed for daylight and eight windows (within 90 degrees of due south) were assessed for sunlight. All 23 windows comply with the BRE criteria for VSC, and both rooms comply with the BRE criteria for NSL. In addition, all eight window meets BRE's criteria for APSH and WPSH. Therefore, the daylight and sunlight effect of the proposed development is Negligible (not significant).

768. In respect of Petticoat Square, Middlesex Estate, which is located approximately 140m northwest of the site. The sensitive windows and rooms on the east facing elevation, which are lined with inset balconies along Harrow Place have been assessed, as this is the closest to the site. A total of 126 windows were assessed for VSC and 59 rooms were assessed for NSL. 125 of the windows would meet the BRE criteria for VSC; the one window that would not meet the BRE criteria serves a bedroom and would experience an alteration of 21.1% which is a minor adverse effect but is only slightly beyond the BRE criteria. Due the location of this window beneath a balcony the baseline value is 1.9% VSC and this window would see an absolute reduction of 0.4% which is likely to be imperceptible. In respect of NSL, one bedroom would experience a change beyond the BRE criteria, 22.5%, which is a minor adverse effect but is only slightly beyond the BRE criteria. Due to its location beneath balconies, the baseline is low (21.7% NSL), the percentage change is disproportionate to what the occupants would be likely to experience. The daylight effect is considered to be Negligible (not significant). For sunlight, all 18 windows (within 90 degrees due south) would meet the BRE criteria, so the effect is considered Negligible (not significant).

769. The rest of this section of the report will address the properties considered in the Environmental Statement.

770. The following scenarios have been assessed:
- Existing Baseline Scenario
- Proposed Development Scenario
- Cumulative Scenario

771. The cumulative schemes considered in the Cumulative Scenario are 115-123 Houndsditch (21/00622/FULEIA) and Bevis Marks House (17/0030/FULMAJ), this is because the Environmental Statement concludes that all other cumulative schemes are considered too far from the site to have a cumulative impact on surrounding sensitive receptors.

Daylight and Sunlight

772. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL) tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met (full details on the daylight tests are set out in appendix C to this report).

773. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times is existing area (20% or more reduction).

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

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

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

776. The submitted Environmental Statement also includes an assessment of Winter Probable Sunlight to give a detailed analysis of winter conditions.

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

778. Both the London Plan 2021 and emerging City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

779. For information, it is noted that Building Research Establishment (BRE) Group were commissioned to undertake an independent review of daylight, sunlight, overshadowing, solar glare and light trespass assessment in terms of their scope, method of assessment and criteria used, and conclusions reached. The assessment comments receive by the third-party reviewer are further discussed below in the relevant section of the report.

Results Overview

Existing Baseline Scenario

780. A total of six buildings have been considered as sensitive receptors (as detailed above) and assessed in the baseline scenario.

781. Within these six buildings there are 787 windows serving 216 rooms which were assessed for daylight and 634 windows assed for sunlight. In the existing baseline scenario, of the 787 windows assessed for daylight, 175 (22.2%) meet the BRE target of 27%VSC and of the 216 rooms assessed for NSL, 130 (60.2%) would receive the BRE target of 80% NSL.

782. With regards to the 634 windows assessed for sunlight, 310 (60.2%) would meet the BRE criteria of 25% APSH of which 5% is during winter (WPSH).

783. As such, it is evident that the locality is affected by the existing dense urban environment of the City and the existing context of tall buildings.

Proposed Development Scenario

784. When comparing the proposed development to the baseline scenario, 393 of the 787 windows assessed would meet the BRE criteria of meeting the 27% VSC target or seeing reduction no greater than 20%. This equates to 49.9% compliance.

785. In this same scenario, of the 216 rooms tested for NSL, 171 would meet the BRE guidelines being a reduction no greater than 20%. This equates to 79.2% compliance.

786. Four of the six buildings assessed would meet the BRE criteria for both VSC and NSL and as such these would experience a negligible impact where the effect is not significant. These are buildings are:

- 10 Wormwood Street
- 25 Wormwood Street
- 26 Wormwood Street
- St Botolph Without Bishopsgate

787. In the proposed scenario in respect of sunlight, of the 634 windows assessed for APSH and WPSH, 256 windows would meet the BRE criteria or would experience a negligible effect (less than 20% alteration). This equates to 40.37% compliance.

788. Three of the six buildings assessed would meet the BRE criteria for both APSH and WPSH and as such these would experience a negligible impact where the effect is not significant. These buildings are:
- 25 Wormwood Street
- 26 Wormwood Street
- St Botolph Without Bishopsgate

Cumulative Development Scenario

789. In the cumulative development scenario, 388 of the 787 windows assessed would meet the BRE criteria of meeting the 27% VSC target or seeing reductions not greater than 20%. This equates to 49.3% compliance.

790. In this same scenario, of the 216 rooms tested for NSL, 171 would meet the BRE criteria of meeting 80% NSL target or seeing reductions no greater than 20%. This equates to 79.2% compliance.

791. Four of the six buildings assessed would meet the BRE criteria for both VSC and NSL and as such these would experience a negligible impact where the effect is not significant. These are buildings are:
- 10 Wormwood Street
- 25 Wormwood Street
- 26 Wormwood Street
- St Botolph Without Bishopsgate

792. In the cumulative development scenario in respect of sunlight, of the 634 windows assessed for APSH and WPSH, 245 windows would meet the BRE criteria or would experience a negligible effect (less than 20% alteration). This equates to 38.6% compliance.

793. Three of the six buildings assessed would meet the BRE criteria for both APSH and WPSH and as such these building would experience a negligible impact where the effect is not significant. These buildings are:
- 25 Wormwood Street
- 26 Wormwood Street
- St Botolph Without Bishopsgate

Assessment of affected properties

794. The assessment below focuses on those buildings with windows and rooms that would see a reduction in VSC and/or NSL and/or APSH and/or WPSH in the proposed development and cumulative development scenarios.

10 Wormwood Street

795. This is a mixed-use building situated to the west of the site. The building has commercial uses on the ground floor, with residential properties located on the first to third floors.

796. It is highlighted that this property complies with the BRE criteria in respect of daylight.

797. A total of 118 windows serving 39 rooms were assessed for sunlight.

Proposed Development Scenario

798. For APSH, 106, of the 118 windows assessed would meet the BRE criteria and would experience a negligible impact where the effect is not significant; this equates to 89.9% compliance. Of the 12 affected windows, 11 would experience alterations between 20-29.9% which is a Minor Adverse effect and one window would experience an alteration of 35.7% which is a Moderate Adverse effect. In the existing baseline, all of these windows fall outside of the BRE criteria for APSH. The BRE guidance notes that where the overall loss of APSH is 4% of less, “the loss of sunlight is small”; none of the affected windows would experience an absolute change of more than 5%, demonstrating that the absolute change indicates that the loss of sunlight is unlikely to be noticeable to the occupiers.

799. For WPSH, all of the 118 windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant.

800. Overall, in the proposed development scenario, the impact is considered to be Minor Adverse.

Cumulative Development Scenario

801. 97 of the 118 windows assessed would meet the BRE criteria for both APSH and WPSH so would experience a negligible where the effect is not significant. This equates to 82.2% compliance.

802. For APSH, 100 of the 118 windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 84.74% compliance. Of the 18 affected windows, 17 would experience a Minor Adverse effect and one would experience an alteration of 35.7% which is a Moderate Adverse effect.

803. For WPSH, 107 of the 118 windows assessed would meet the BRE criteria so would experience a Negligible impact where the effect is not significant. This equates to 90.67% compliance. Of the 11 windows affected, four would experience a Moderate Adverse effect and seven would experience a Major Adverse effect. It is highlighted that in absolute terms, the alterations would be 1%, which is unlikely to be noticeable by the occupiers.

804. Whilst there are additional impacts as result of the addition of the Cumulative schemes, the effect is still considered to be Minor Adverse as per the Proposed Development scenario.

16 New Street, Tapestry Building

805. This building is a mixed-use building situated to the north of the application site. The ground floor hosts a commercial unit and over the first to fifth floors are 14 residential units.

806. A total of five windows serving four rooms were assessed for daylight.

807. A total of five windows were assessed for sunlight.

Proposed Development Scenario

808. For VSC, three of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 60% compliance. Of the two affected windows, they both would experience of alterations between 20 to 29.9% which is considered to be a Minor Adverse effect. Both of these windows have existing low values, therefore the resulting percentage change is disproportionate; the absolute change would be 3.1% and 3.4%. These windows also serve bedrooms, which the BRE guidance suggests that the daylight distribution may be less important in bedrooms.

809. For NSL, two of the four rooms assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 50% compliance. Of the affected rooms, they both experience an alteration between 30 to 39.9% which is considered to be a Moderate Adverse effect. Both of these rooms are bedrooms which the BRE guidance suggested that the daylight distribution may be less important in bedrooms.

810. Overall, the effect of daylight levels is considered to be Minor Adverse. Given the number of impacted windows, the existing low values and as the rooms are bedrooms which the BRE guidance suggests are less important, in this context it is not considered that the proposal would result in an unacceptable impact.

811. For APSH, four of the five windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 80% compliance. The one affected window would experience an alteration of 25% which is a Minor Adverse effect. The BRE guidance notes that where there is an overall annual loss of APSH is 4% or less, “the loss of sunlight is small”, the affected window would experience an absolute change of 5%. The absolute change of 5% indicates the loss of sunlight is unlikely to be noticeable to the occupiers. It is also noted that this window serves a bedroom, which the BRE guidance suggests the sunlight provision to this room type is less important.

812. For WPSH, four of the five windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 80% compliance. The one affected window would experience a Major Adverse effect but the absolute change would be 3%, wherein the BRE guidance notes that where an absolute loss of winter PSH is 4% or less, *“the loss of sunlight is small”*, and therefore unlikely to be noticeable to the occupiers.

813. Overall, the effect on sunlight levels is considered to be Negligible to Minor Adverse.

Cumulative Development Scenario

814. For VSC, two of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 40% compliance. Of the three affected windows, two of these windows also did not comply in the Proposed Development Scenario, one of the windows would experience no further alterations compared to the Proposed Development scenario and would experience a marginal increase in alteration by 0.4% in absolute terms. The additional window that would experience alterations in the Cumulative Development Scenario, would experience an alteration of 20.9% which is just over the 20% criteria so is unlikely to be noticeable by the occupier.

815. For NSL, two of the four rooms assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 50% compliance. The affected bedrooms are the same rooms as in the Proposed Development Scenario and they would both experience an alteration between 30 to 39.9%, which is considered to be a Moderate Adverse effect. One of these bedrooms, would experience the same alteration as in the Proposed Development scenario and the other bedrooms would experience a minor increased alteration from 34.3% to 35.8%. The BRE guidance suggests that the daylight distribution may be less important in bedrooms.

816. Overall, given the nature of the additional daylight impacts that occur as a result of the cumulative schemes, the effect is considered to remain Minor Adverse, as the additional reductions are unlikely to noticeable alter the retained levels.

817. For APSH, four of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 80% compliance. The one affected window would experience an alteration of 25% which is a Minor Adverse effect. The affected window serves a bedroom, which the BRE guidance suggests sunlight provision to these rooms is less important.

818. For WPSH, three of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 60% compliance. Both of the affected windows would experience alterations in excess of 40% which is a Major Adverse effect. Both of these windows served bedrooms, the BRE guidance suggests sunlight provision to these rooms is less important.

819. Overall, given the nature of the additional sunlight impacts occur as a result of the cumulative schemes coming forward with the proposed development, the effect is considered to be Minor to Moderate Adverse compared to the Minor Adverse impact of the proposed development alone.

One Bishopsgate Plaza

820. This building is a mixed-use building comprising of the Pan Pacific Hotel up to the level 20 and levels 21 to 41 consist of residential properties, the Sky Residences. Of the sensitive receptors assessed, this building is the closest to the application site.

Pan Pacific Hotel

821. The Pan Pacific Hotel is a commercial receptor and the impact on their daylight and sunlight has not been assessed. Although the impact of the development on the existing non-domestic part of the building has not been assessed, it is considered that the loss of daylight and sunlight on hotels is not as harmful as on residential uses due to the temporary nature of the accommodation and transient nature of the occupiers. Local Plan Policy DM10.7 and London Plan Policy D6 require protection of daylight and sunlight to dwellings and housing. Emerging policy DE7 requires to demonstrate that the daylight and sunlight to nearby sensitive receptors, including hotels, is appropriate for their context. Although the impacts of the proposed development on the nearby hotel have not been assessed, and it cannot be demonstrated that the impacts are acceptable in accordance with policy DE7, as a matter of judgment, any impact would not have a material impact on the continued use of the building as a hotel.

Sky Residences

822. A total of 580 windows serving 150 rooms have been assessed for daylight.

823. A total of 454 windows serving 129 rooms have been assessed for sunlight.

824. In the existing baseline scenario, 175 of the 580 windows comply with the BRE criteria for VSC, 117 of the 150 rooms meet the BRE criteria for NSL, and 306 of the windows meet the criteria for both APSH and WPSH.

Proposed Development

825. For VSC, 188 of the 580 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 32.8% compliance. Of the affected windows, five would experience a Minor Adverse effect (20 to 29.9%) nine windows would experience a Moderate Adverse effect (30 to 39.9%) and a total of 378 windows would experience alterations in excess of 40%, which is a Major Adverse effect. In the existing baseline scenario, all of these windows have low values that fall below the BRE criteria; this is highlighted as existing low values can result in disproportionate percentage losses.

826. For NSL, 107 of the 150 rooms would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 71.33% compliance. Of the affected rooms, two would experience Minor Adverse effects (20 to 29.9%), three would experience Moderate Adverse effects (30 to 39.9%) and 39 would experience Major Adverse effects (40% or greater).

827. For APSH, 89 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 19.6% compliance. Of the affected windows, five would experience Minor Adverse effects (20 to 29.9%), five would experience Moderate Adverse effects (30 to 39.9%) and 355 would experience Major Adverse effects (40% or greater).

828. For WPSH, 141 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 31.05% compliance. The 313 impacted windows would all experience Major Adverse effects (40% of greater).

829. The impacted windows are primary living space LKDs (living, kitchen and/or dining rooms), bedrooms or studio apartments. An assessment of each room type is set out below.

Bedrooms

830. 96 bedrooms were considered as part of the assessment. 18 of the bedrooms assessed would meet the BRE criteria for both VSC and NSL so would experience negligible impact where the effect is not significant.

831. All of the bedrooms are served by more than one window, and as such, a weighted VSC average for the rooms has been calculated in accordance with the BRE guidance. When the weighted VSC average is considered, the 78 bedrooms that would not be compliant with the BRE criteria, would all experience a Major Adverse effect (40% or greater). All of the windows that experience an alteration greater than 40% have existing values that fall below the BRE criteria, with 85 windows possessing existing values of less than 10%; this is highlighted, as existing low values can result in disproportionate percentage losses.

832. Of these 78 bedrooms, 54 of these would be compliant with the BRE criteria for NSL so would experience a negligible impact where the effect is not significant. Of the affected bedrooms, two would experience a Minor Adverse effect, three would experience a Moderate Adverse effect and 37 would experience a Major Adverse effect. It is noted that the BRE guidance suggests that the daylight distribution may be less important in bedrooms.

833. For APSH, 229 windows serving the 96 bedrooms were assessed. None of these windows would comply with the BRE criteria. Of the affected windows, two windows would experience a Moderate Adverse effect (30-39.9%) and 227 windows would experience a Major Adverse effect (>40%). The BRE guidance suggests sunlight provision to these rooms is less important.

834. For WPSH, 229 windows serving 96 bedrooms were assessed. Seven would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, 221 would experience a Major Adverse effect (>40%). The BRE guidance suggests sunlight provision to these rooms is less important.

LKDs

835. 47 LKDs were assessed as part of the assessment. 26 of these would be BRE compliant with the BRE criteria for both VSC and NSL so would experience a negligible impact where the effect is not significant.

836. The LKDs are served by more than one window and as such a weighted VSC average for the rooms has also been calculated in accordance with the BRE guidance. When the weight VSC is considered 27 of the LKDs would be BRE compliant, 13 would experience a Minor Adverse effect, five would experience a Moderate Adverse effect and two would experience a Major Adverse effect.

837. Of the affected LKDs, 12 would retain room average VSC values in the mid-teens or higher; mid-teen values in dense urban locations can be considered acceptable. All of the windows that experience a Major Adverse effect, have existing values that fall below the BRE criteria, with 21 windows possessing existing values of 10%; this is highlighted, as existing low values can result in disproportionate percentage losses.

838. When NSL is considered, 46 of the LKDs would be compliant with the BRE criteria so would experience a negligible impact where the effect is not significant. The one impacted LKD in terms of NSL would experience a Major Adverse effect.

839. For APSH, 196 windows serving the 47 LKDS were assessed, and 85 windows would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, five would experience Minor Adverse effects (20 to 29.9%), three would experience Moderate Adverse effects (30 to 39.9%) and 103 would experience Major Adverse effects (>40%).

840. For WPSH, 196 windows serving the 47 LKDs were assessed and 126 would be compliant with the BRE criteria so would experience a negligible effect where the effect is not significant. Of the affected windows, 70 would experience a Major Adverse effect (>40%).

Studio Apartments

841. Seven Studio Apartments were considered as part of the assessment. The Studio Apartments are all served by more than one window and as such a weighted assessment has also been calculated in accordance with the BRE guidance.

842. When the weighted VSC is considered, all seven studio apartments would experience alterations beyond the BRE criteria. One would experience a Minor Adverse effect and six would experience a Major Adverse effect. All of the windows that experience alterations greater than 40%, have existing low values that fall below the BRE criteria, with 7 windows possessing existing values of less than 10% this is highlighted, as existing low values can result in disproportionate percentage losses.

843. All seven Studio Apartments would comply with the BRE criteria is respect of NSL so would experience a negligible impact where the effect is not significant.

844. For APSH, 29 windows serving the seven studio apartments were assessed. Four windows would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, 25 would experience a Major Adverse effect (>40%).

845. For WPSH, 29 windows serving the seven studio apartments were assessed. Seven windows would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, 22 would experience a Major Adverse effect (>40%).

846. The overall impact on these residential properties is considered to be Major Adverse.

847. Whilst the Major Adverse impact on this property is acknowledged, taking into consideration the location of the application site and these residential properties within the City Cluster, the dense urban environment of the City and in particular the Cluster, and any reasonable increase in massing, done in order to meet the aims of the development plan and the priorities for the CAZ on delivery on office floorspace, the impact on these residential properties are considered to be acceptable in this instance.

Cumulative Development Scenario

848. For VSC, in the cumulative development scenario, four additional windows would fail to comply with the BRE criteria; all four windows would experience a Minor Adverse effect, and these windows all serve LKDs.

849. For NSL, in the cumulative development scenario, there would be no additional impacts compared to the proposed development scenario.

850. For APSH, 88 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 19.38% compliance (compared to 19.6% in the proposed development scenario). Of the affected windows, three would experience Minor Adverse effects, seven would experience Moderate Adverse effects and the remaining 324 would experience a Major Adverse effect.

851. For WPSH, 130 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates

to 28.63% (compared to 31.05% in the proposed development scenario). All of the affected windows would experience Major Adverse alterations.

852. Representations have been received in respect of the daylight and sunlight impacts on these properties, as highlighted above, whilst the Major Adverse impact on this property is acknowledged, taking into consideration the location of the application site and these residential properties within the City Cluster, the dense urban environment of the City and in particular the Cluster, and any reasonable increase in massing, done in order to meet the aims of the development plan and the priorities for the CAZ on delivery on office floorspace, the impact on these residential properties are considered to be acceptable in this instance

853. Whilst there are additional affects as results of the cumulative schemes coming forward together with the proposed development, the effect is still considered to be Major Adverse as per the Proposed Development Scenario.

Conclusion on Daylight and Sunlight Impacts

854. In summary the above consideration demonstrates in respect of daylight, out of the six properties considered in the proposed development scenario:

- Four would experience Negligible effects (10 Wormwood Street, 25 Wormwood Street, 26 Wormwood Street and St Botolph Without Bishopsgate)
- One would experience Minor Adverse effects (16 New Street, Tapestry Building)
- One would experience Major Adverse effects (One Bishopsgate Plaza)

855. When cumulative development is introduced, in respect of daylight, the effects remain as above.

856. In respect of sunlight, out of the six properties considered in the proposed development scenario:

- Three would experience Negligible effects (25 Wormwood Street, 26 Wormwood Street and St Botolph Without Bishopsgate)
- One would experience Minor Adverse (16 New Street, Tapestry Building)
- One would experience Major Adverse effects (One Bishopsgate Plaza)

857. When cumulative development is introduced, in respect of sunlight, the effects remain as above.

858. Whilst officers to acknowledge that there are transgressions beyond the BRE criteria and some of these are Major Adverse (namely One Bishopsgate Plaza), taking into account the location of the application site and the impacted residential properties within the Cluster, the dense urban environment of the

City particularly the Cluster, and any reasonable increase in massing, done to meet the aims of the development plan and the priorities of the CAZ on the delivery of floorspace, the impact on the above mentioned residential properties are considered acceptable in this instance and the proposal is not considered to result in a reduction of daylight and/or sunlight to unacceptable levels considering its context and therefore in compliance with the relevant development plan polices in particular Local Plan policy DM10.7 and London Plan Policy D6(d). Although there is conflict with emerging City Plan policy DE7 in relation to the hotel use, due to the inability to demonstrate that the impacts of the development would be acceptable, the policy is complied with in respect to housing and for the purposes of the hotel it is considered that the development would not pause a threat in continuing being used for its purpose.. The daylight and sunlight available to the Pan Pacific Hotel has not been assessed; to that extent the proposals conflict with emerging City Plan policy DE7.

Overshadowing

859. In relation to overshadowing of amenity spaces this is measure using sunlight hours on the ground. The BRE guideline recommends that the availability of sunlight be checked for open spaces including residential gardens, and public amenity spaces. A total of eight outdoor spaces have been considered as sensitive receptors and have been tested for Sunlight Hours on the Ground (full details of the Sunlight Hours on Ground Test are set out in Appendix C to this this report), these eight spaces are:

- St Botolph Churchyard
- One Bishopsgate Plaza, 80 Houndsditch, Public Realm
- One Bishopsgate Plaza, 80 Houndsditch, Terrace 01
- One Bishopsgate Plaza, 80 Houndsditch, Terrace 02
- Jubilee Gardens (public amenity just off the junction with Houndsditch and Outwich Street)
- Devonshire Square A (public outdoor amenity off Devonshire Square and Devonshire Row)
- Devonshire Square B (public outdoor amenity off Devonshire Square and Devonshire Row)
- Devonshire Square C (public outdoor amenity off Devonshire Square and Devonshire Row)

860. For each amenity space, six scenarios were tested:

- Baseline Scenario
- Proposed Development in Existing Baseline Scenario
- Future Baseline Tier 1 Scenario
- Proposed Development in Future Baseline Tier 1 Scenario
- Future Baseline Tier 1 and Tier 2 Scenario
- Proposed Development in Future Baseline Tier 1 and Tier 2 Scenario

861. In the Existing Baseline only four of the amenity spaces meet the BRE criteria of receiving at least two hours of sunlight on the 21st March for at least 50% of their area which could impact the comfort and enjoyment of these spaces as required by policy, and this is considered in the planning balance section of this report.

St Botolph Churchyard

862. In the Existing Baseline Scenario, 0% of this amenity space would see sunlight for at least two hours of the 21st March and therefore does not meet the BRE guidance of achieving at least two hours of sunlight on the 21st March for at least 50% of their area. This would also be the situation in all five other scenarios.

863. The sun exposure diagrams show that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios on both the 21st March and 21st June would result in similar conditions compared to the conditions without the proposed development.

864. In consideration of the above, the proposed development would not have an unacceptable impact on St Botolph Churchyard.

One Bishopsgate Plaza, 80 Houndsditch, Public Realm

865. In the Existing Baseline Scenario, 0% of this amenity space would see sunlight for at least two hours of the 21st of March and therefore does not meet the BRE guidance of achieving at least two hours of sunlight on the 21st March for at least 50% of their area. This would also be the situation in all five other scenarios.

866. The sun exposure diagrams show that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios on the 21st June would result in similar conditions to those without the proposed development. On the 21st March, in the Existing Baseline scenario, this area receives between 0 to 1.5 hours, and this would be slightly reduced to 0 to1 hours when the proposed development is introduced. In both the Future Baseline Tier 1 and Future Baseline Tier 1 and 2 scenarios, this area receives between 0 to1 hours, and this would be slightly reduced to 0 to 0.5 hours when the proposed development is introduced.

867. Given that in the Existing Baseline Scenario, the policy requirement of at achieving at least two hours of sunlight on the 21st March is not met, combined with the extent of the alterations to the sun exposure (which is a

supplementary test), the impact on One Bishopsgate Plaza, 80 Houndsditch, Public Realm is considered acceptable.

One Bishopsgate Plaza, 80 Houndsditch, Terrace 01

868. In the Existing Baseline Scenario, 97% of this terrace would receive at least two hours of sunlight and therefore meets the BRE criteria of at least 50% of the area receiving at least two hours of sunlight. In the Proposed Development in the Existing Baseline Scenario, the terrace would experience a 1% reduction in the amount of area receiving at least two hours of direct sunlight. This a negligible (not significant) effect and the area would remain BRE compliant as a result of the proposed development.

869. In the Future Baseline Tier 1 Scenario, 96% of this terrace would receive at least two hours of sunlight, the introduction of the Cumulative Tier 1 schemes would result in a 1% reduction compared to the Existing Baseline. When the Proposed Development is introduced, there would not be an alteration, as 96% of the area would still receive at least two hours of sunlight and remain compliant with the BRE criteria. The Tier 1 cumulative schemes result in the Negligible (not significant) effect.

870. In the Future Baseline Tier 1 and Tier 2 Scenario, 96% of this would receive at least two hours of sunlight. The introduction of the Tier 2 schemes does not result in any further alterations beyond the Tier 1 schemes. When the Proposed Development is introduced, there would not be an alteration as 96% of the area would still receive at least two hours of sunlight and remain compliant with the BRE criteria.

871. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1, Future Baseline Tier 1 and Tier 2 scenarios on the 21st June would result in similar conditions to those without the proposed development. On the 21st March, in the Existing Baseline scenario, this area receives between 3 to 5 hours of sunlight, and this would be slightly reduced to 3 to 4.5 hours when the proposed development is introduced. In both the Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios, these areas would receive between 3 to 5.5 hours, and this would be slightly reduced to 3 to 5 hours when the proposed development is introduced.

872. Whilst the supplementary sun exposure tests shows that there would be a slight reduction in the number of sunlight hours, overall given that the terrace would remain BRE compliant in terms of the amount of area receiving at least two hours of sunlight, the impact on One Bishopsgate Plaza, 80 Houndsditch, Terrace 01 is acceptable.

One Bishopsgate Plaza, 80 Houndsditch, Terrace 02

873. In the Existing Baseline Scenario, 98% of this terrace would receive at least two hours of sunlight and therefore meets the BRE criteria of at least 50% of the area receiving at least two hours of sunlight. In the Proposed Development in the Existing Baseline Scenario, the terrace would experience a 2% reduction in the amount of area receiving at least two hours of direct sunlight. This a negligible (not significant) effect and the area would remain BRE compliant with the introduction of the proposed development.

874. In the Future Baseline Tier 1 Scenario, 97% of this terrace would receive at least two hours of sunlight, the introduction of the Cumulative Tier 1 schemes would result in a 1% reduction compared to the Existing Baseline. When the Proposed Development is introduced, there would be a 1% reduction in the amount of area receiving at least two hours of sunlight as 96% of the terrace would receive at least two hours of sunlight. This is a negligible (not significant) effect and would remain BRE compliant.

875. In the Future Baseline Tier 1 and Tier 2 scenario, 97% of this terrace would receive at least two hours of sunlight. The introduction of the Tier 2 schemes does not result in any further alterations beyond the Tier 1 schemes. When the proposed development is introduced, there would be a 1% reduction in the amount of area receiving at least two hours of sunlight as 96% of the terrace would receive at least two hours of sunlight. This is a negligible (not significant) effect and would remain BRE compliant.

876. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1, and Future Baseline Tier 1 and Tier 2 scenarios on the 21st June would result in similar conditions to those without the proposed development. On the 21st March, in the Existing Baseline scenario this area receives 6+ hours of sunlight , and this would be reduced to between 4 to 4.5 hours when the proposed development is introduced. In the Future Baseline Tier 1 scenario, this area receives between 5 to 5.5 hours of sunlight, and this would be reduced to between 4 to 4.5 hours when the proposed development is introduced. In the Future Baseline Tier 1 and Tier 2 scenario, this area receives between 5.5 to 6+ hours of sunlight and this would be reduced to between 4 to 5 hours when the proposed development is introduced.

877. Whilst the supplementary sun exposure tests shows that there would be a reduction in the number of sunlight hours, overall given that the terrace would remain BRE compliant in terms of the amount of area receiving at least two hours of sunlight, the impact on One Bishopsgate Plaza, 80 Houndsditch, Terrace 02 is acceptable.

Jubilee Gardens (public amenity just off the junction with Houndsditch and Outwich Street)

878. In the Existing Baseline Scenario, 0% of this amenity space would see sunlight for at two hours on the 21st March and therefore does not meet the BRE guidance of achieving at least two hours of sunlight on the 21st March for at least 50% of their area. This would also be the situation in all five other scenarios.

879. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and 2 scenarios would result in similar conditions to those without the proposed development on the 21st March. On the 21st June, in the Existing Baseline scenario, this area receives between 1-4 hours of sunlight, and this would be reduced to between 0 to 2 hours when the proposed development is introduced. In the Future Baseline Tier 1 scenario this area receives between 1 to 4 hours and this would be reduced to 0 to 2 hours when the proposed development is added. In the Future Baseline Tier 1 and Tier 2 scenario, this area receives between 1.5 to 4 hours, and this would be reduced to 0 to 1.5 hours when the proposed development is introduced.

880. Given that in the Existing Baseline Scenario, the policy requirement of at achieving at least two hours of sunlight on the 21st March is not met, combined with the extent of the alterations to the sun exposure (which is a supplementary test), the impact on Jubilee Gardens is considered acceptable.

Devonshire Square A (public outdoor amenity off Devonshire Square and Devonshire Row)

881. In the Existing Baseline Scenario, 62% of this public outdoor amenity space receives at least two hours of direct sunlight on the 21st March. The amenity space would see a reduction of 18% in the amount of area receiving at least two hours of direct sunlight with the proposed development in place. This reduction is less than 20% and as such in accordance with the BRE guidance, this would result in a Negligible (not significant) effect.

882. In the Future Baseline Tier 1 Scenario, 33% of this amenity space would receive at least two hours of sunlight on the 21st March. This reduction compared to the Existing Baseline is as result of the Tier 1 Cumulative Schemes. The introduction of the Proposed Development would result in a 100% alteration in terms of percentage of the area which would receive at least two hours of sunlight as 0% would receive at least two hours of direct sunlight. Overall, this is a Major Adverse effect.

883. In the Future Baseline Tier 1 and 2 Scenario, 33% of this amenity space would receive at least two hours of sunlight. The introduction of the Tier 2 schemes would not result in further alterations beyond the Tier 1 schemes. As like with

Tier 1, when the Proposed Development is introduced 0% would receive at least two hours of direct sunlight

884. The sun exposure diagrams demonstrate that in the Existing Baseline and Future Baseline Tier 1 and Tier 2 scenario on the 21st June this area receives between 3 to 6+ hours and when the proposed development is introduced the range of hours would be the same but there would be more areas towards the lower end of the range. In the Future Baseline Tier 1 scenario, on the 21st June, this area receives between 3.5 to 6+ hours and when the proposed development is introduced the range of hours would be the same but there would be more areas toward the lower end of the range. On the 21st March in the Existing Baseline scenario, this area receives between 0.5 to 6+ hours and this would be reduced to 0.5 to 3 hours when the proposed development in introduced. In the Future Baseline Tier 1 scenario on the 21st March this area receives between 0 to 3 hours and this would be reduced to 0 to 2.5 hours when the proposed development is introduced. In the Future Baseline Tier 1 and 2 scenario this area receives between 0.5 to 3.5 hours, and this would be reduced to 0 to 2.5 hours when the proposed development is introduced.

885. As set out above, this amenity area would experience a Major Adverse effect.

Devonshire Square B (public outdoor amenity off Devonshire Square and Devonshire Row)

886. In the Existing Baseline Scenario, 60% of this public outdoor amenity space receives at least two hours of sunlight on the 21st March, complying with the BRE criteria. The introduction of the proposed development would not result in any alterations as 60% of the area would still receive at least two hours of direct sunlight on the 21st March. This a negligible (not significant) effect and the area would remain BRE compliant as a result of the proposed development.

887. In the Future Baseline Tier 1 Scenario, 0% of this amenity space would receive at least two hours of direct sunlight. It is the introduction of the Tier 1 cumulative schemes that result in this impact compared to the Existing Baseline Scenario. When the Proposed Development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.

888. In the Future Baseline Tier 1 and Tier 2 Scenario, the introduction of the Tier 2 scheme would not result in any further alterations beyond the Tier 1 schemes. When the Proposed Development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.

889. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future

Baseline Tier 1 and Tier 2 scenarios on the 21st March would result similar conditions to those without the proposed development. In the Existing Baseline Scenario, Future Baseline Tier 1 and Future Baseline Tier 1 and 2, on the 21st June, the range of hours would be the same but there would be more areas towards the lower end of the range when the proposed development is introduced.

890. The proposed development in itself would not have an impact on the extent of this space would receive at least two of sunlight. It is the Cumulative Tier 1 schemes that result in the impact on this amenity area.

Devonshire Square C (public outdoor amenity off Devonshire Square and Devonshire Row)

891. In the Existing Baseline Scenario, 20% of this public outdoor amenity space would receive at least two hours of sunlight on the 21st March; this does not comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight. The introduction of the Proposed Development would not result in any alterations as 20% of the area would still receive at least two hours of direct sunlight on the 21st March. This a negligible (not significant) effect.

892. In the Future Baseline Tier 1 Scenario, 6% of this this amenity space would receive at least two hours of directs sunlight. It is the introduction of the Tier 1 cumulative schemes that result in this impact compared to the Existing Baseline Scenario. When the proposed development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.

893. In the Future Baseline Tier 1 and Tier 2 Scenario, the introduction of the Tier 2 scheme would not result in any further alterations beyond the Tier 1 schemes. When the Proposed Development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.

894. The sun exposure diagrams show that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios on both the 21st March and 21st June would result in similar conditions compared to the conditions without the proposed development.

895. The proposed development in itself would not have an impact on the extent of this space would receive at least two of sunlight. It is the Cumulative Tier 1 schemes that result in the impact on this amenity area.

Overshadowing Conclusion

896. Overall, the impact to five of the six amenity spaces as of the result of the proposed development is such they would not experience materially harmful overshadowing effects caused by the development and therefore comply with London Plan policy D9C (3)(a), policy DM10.7 of the Local Plan and policy DE7 of the emerging City Plan 2040. One amenity space, Devonshire Square A would experience a Major Adverse effect in the cumulative scenario, which could impact the comfort and enjoyment of this space being in conflict with the policy requirements and this is considered in the overall planning balance section of this report.

Transient Overshadowing

897. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify different times of day and year when shadow would be cast over a surrounding area.

898. In relation to overshadowing, all areas of public open space, such as parks, squares, neighbouring communal areas and private gardens, are considered highly sensitive. A total of eight outdoor spaces have been considered as highly sensitive, these eight spaces are:

- St Botolph Churchyard
- One Bishopsgate Plaza, 80 Houndsditch, Public Realm
- One Bishopsgate Plaza, 80 Houndsditch, Terrace 01
- One Bishopsgate Plaza, 80 Houndsditch, Terrace 02
- Jubilee Gardens (public amenity just off the junction with Houndsditch and Outwich Street)
- Devonshire Square A (public outdoor amenity off Devonshire Square and Devonshire Row)
- Devonshire Square B (public outdoor amenity off Devonshire Square and Devonshire Row)
- Devonshire Square C (public outdoor amenity off Devonshire Square and Devonshire Row)

899. The Proposed Development scenario, Cumulative Tier 1 scenario and Cumulative Tier 1 and Tier 2 scenario have been assessed, and the results are set out below.

Proposed Development

Equinox (21st March/September)

900. On this day, shadow is cast from the Proposed Development from 08:00GMT, which moves in a clockwise direction throughout the day. At this time, the shadow is cast in the direction of St Botolph's Church Yard, which is already shaded due to the existing buildings, and so no additional overshadowing occurs. Between 10:00GMT to 11:00GMT, the Proposed Development causes

a small strip of overshadowing to One Bishopsgate Plaza, 80 Houndsditch Public Realm. As the shadow continues in an easterly direction, it passes over One Bishopsgate Plaza, 80 Houndsditch, Terrace 01 and 02, Jubilee Gardens and Devonshire Square A from 11:00 to 15:00GMT. No additional shading would occur to Devonshire Square B, with a very small period of additional shadow to Devonshire Square C would occur between 15:00 and 16:00GMT.

Summer Solstice (21st June)

901. On this day, shadow is cast from the Proposed Development from 07:00BST, which moves in a clockwise direction throughout the day. None of these areas are overshadowed at this time until 10:00BST, when a small strip of shadow is cast in the direction of St Botolph's Church Yard, which clears by 11:00BST. From 12:00BST to 17:00BST, the Proposed Development passes over One Bishopsgate Plaza, 80 Houndsditch Public Realm and Terraces 01 and 02, Jubilee Gardens and Devonshire Square A, B and C. The shadows move quickly across these areas and do not result in permanent shading for prolonged periods of time.

Winter Equinox (21st December)

902. On this day, shadow is cast from the Proposed Development from 09:00GMT, which moves in a clockwise direction throughout the day.

903. Due to existing buildings, no additional shading is caused by the proposed development.

Cumulative Tier 1 Scenario

Equinox (21st March/September)

904. On this day, St Botolph Churchyard would experience some additional overshadowing from 14:00 onwards. One Bishopsgate Plaza would experience some additional overshadowing around 09:00. Devonshire Square A would experience some additional overshadowing from circa 09:00 and the shadow moves in a clockwise direction and in turn affects Devonshire Square B and C up until 15:00. These areas remain in shadow for the rest of the day; however, this is a result of the existing context.

905. The additional shadowing in the Tier 1 Cumulative Scenario is mainly a result of 115-123 Houndsditch, 24 Bevis Marks, 100 Leadenhall and 55 Old Broad Street.

Summer Solstice (21st June)

906. On this day when the sun is higher in the sky, St Botolph Churchyard, Devonshire Square B and Devonshire Square C would experience some additional shadowing in the afternoon. Additional shadows are cast on St Botolph Churchyard from 14:00 onwards by 55 Bishopsgate and 55 Old Broad Street, as shadows move clockwise for the rest of the day. Devonshire Square B would see additional shadows for a short period of time between 12:00 to 13:00 mainly from 115-123 Houndsditch, and Devonshire Square C would see some additional shadows cast from the same building throughout the afternoon.

Winter Equinox (21st December)

907. On this day when the sun is lower in the sky, most areas are heavily shaded throughout the day, which is expected given the dense urban nature of the area. However, some additional shadows will be cast on St Botolph Churchyard and Devonshire Square C between 13:00 and 14:00.

Cumulative Tier 1 and 2 Scenario

908. Given the distance between the additional cumulative included in this scenario, the effects are largely the same as in the Cumulative Tier 1 scenario. However, there would be some additional shadow cast on St Botolph Churchyard by 99 Bishopsgate from 12:00 onwards on the 21st March and between 13:00 and 16:00 on the 21st June.

Transient Overshadowing Conclusion

909. In conclusion, the results show that there would be no materially harmful overshadowing effects caused by the development to any public amenity areas and therefore the proposal complies with policy D9 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the emerging City Plan 2040.

Solar Glare

910. Glare is discomfort or impairment of vision caused by excessive or large contrast in illuminance 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).

911. 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 a serious problem, 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 use.

912. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.

913. A total of 49 road locations have been identified in the Environmental Statement. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings.

914. The assessment concludes that the development is not considered visible at 39 viewpoints and no impact would occur. At the remaining ten viewpoints, solar reflections would be visible within 20º and 30º of the driver's line of sight or within 5-10 degrees on small portions of the façade and for short period of time. The Environmental Statement concludes that this would be a Minor Adverse (not significant) effect, and that no mitigation is necessary.

915. Overall, the potential impact from solar glare from the proposed development are considered at its worse minor adverse but the effects are not significant.

916. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of 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 effects on surrounding buildings and public realm.

Light Spill

917. Local Plan policy DM15.7 and emerging City Plan 2040 policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

918. The potential light spillage impacts arising from the Proposed Development has been assessed on one building (One Bishopsgate Plaza, 80 Houndsditch), which the Environmental Statement identified within a 30m radius from the proposed development as sensitive to the impact of light pollution in accordance with the Institute of Lighting Practitioners (ILP) Guidance.

919. The assessment shows that pre-curfew (before 11pm), the level of light pollution would be limited and well within the 25-lux threshold out within the ILP guidance. The post curfew (after 11pm) assessment shows that the level

of light trespass would be below the 5-lux threshold set out within the ILP guidance. The impact on One Bishopsgate Plaza, 80 Houndsditch would be Negligible (not significant).

920. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of any internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour, and associated management measures to reduce the impact on light pollution and residential amenity in line with the City's Lighting SPD.

921. Subject to the imposition of the condition, the proposed development would comply with Local Plan policy DM15.7 and emerging City Plan 2040 DE8 and has been designed to avoid light spill.

Third Party Review

922. For information, Building Research Establishment (BRE) Group were commissioned to undertake an independent review of daylight, sunlight, overshadowing, solar glare and light trespass assessment in terms of their scope, method of assessment and criteria used, and conclusions reached.

923. The review concluded that the overall scope is reasonable. They did state that the full set of window maps were missing, these were provided by the applicant team once requested. The review did highlight that the BRE guidance suggests that Pan Pacific Hotel could be assessed and noted that loss of light could be considered less of an issue compared to dwellings; this information was not requested by officers and this is set out in the assessment above.

924. In respect of the assessment methodology and assessment review, BRE Group were generally satisfied with the assessment methodology. They did, however, raise points of clarification and these are discussed below.

Environmental Impact Assessment

925. BRE Group disagree with the way in which Minor Adverse impacts have been categorised as 'Not significant effects' and suggest that Minor Adverse effects should be categorised as 'Significant effects'.

926. BRE Group also provided comments in relation to the discussion in the chapter based on a two-stage approach, as they state this approach is not based on the specific advice in the BRE report and would be considered part of the planning decision rather than the technical study. This is noted by Officers and Officers highlight this report has undertaken an assessment of the impacts.

Solar Glare

927. Overall BRE Group conclude that the assessment is based on an appropriate number of road viewpoints near to the site, however they did say a more detailed calculation could be undertaken in respect of two viewpoints that have small areas within the 10º line of site.

Light Pollution

928. BRE Group made a range of comments in relation to the submitted light pollution assessment, including: the assessment did not use a final internal lighting design or a notional design; it is not clear how the pre-curfew and post-curfew calculations have been carried out; and highlights that a further assessment would need to be prepared at detailed design stage.

929. The applicants provided updated information, and detailed post curfew assessment. BRE Group have confirmed that the assessment demonstrates compliance with the 5 lux post-curfew guideline and that agree that the impacts were properly assessed. It is highlighted though that a condition is proposed to be imposed to secure the submission of a lighting strategy on the detailed design. Officers are satisfied that the imposition of this condition would address the comments made by BRE Group.

Loss of daylight and sunlight to surroundings

80 Houndsditch- One Bishopsgate Plaza

930. BRE Group commented that there were some minor discrepancies between summary results in the appendices and the discussion within the Environmental Statement. The Applicant confirmed the correct figures.

931. BRE Group considered the Major Adverse impact to be appropriate.

16 New Street, Tapestry Building

932. BRE Group considered the Minor Adverse impact to be appropriate. As discussed above, they do not agree that a Minor Adverse impact would be a ‘Not significant effect’.

10 Wormwood Street

933. BRE Group considered the Minor Adverse impact to be reasonable.

Gardens and Open Spaces

934. BRE Group commented that the presentation of the results did not include a presentation of the results for the existing baseline against any cumulative scenario. This information was provided by the Applicant and the assessment above is based on this information.

Thermal Comfort Assessment

935. 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.

936. 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.

937. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort are set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description	Colour
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red

938. A full assessment of the impact of the impact of the development on thermal comfort was undertaken in accordance with the City of London Thermal Comfort Guidelines and having regard to policies D8 and D9 of the London Plan and policies S8, S12 and S21 of the emerging City Plan 2040. The assessment has tested four configurations including:

- Configuration 1: Existing Site with existing surrounding buildings.
- Configuration 2: Proposed Development with existing surrounding buildings.
- Configuration 3: Proposed Development with Tier 1 cumulative surrounding buildings.
- Configuration 4: Proposed Development with Tier 1 and Tier 2 cumulative surrounding buildings.

Configuration 1: Existing Site with existing surrounding buildings

939. In the existing scenario, in the seasons of spring, summer and autumn, the UTCI values generally stay within the acceptable range for at least 90% of the time in most locations. In these seasons conditions are worse at the junction of Camomile Street and Bishopsgate and along Bishopsgate, as UTCI values generally stay within the acceptable range for at least 75% of the time. During the winter, due to lower air temperatures and reduced solar radiation combined with higher wind speeds, this results in a greater number of hours falling outside the acceptable range, as the UTCI values generally stay within the acceptable range for at least 80% of the time. In the winter, conditions are worse at the junction of Camomile Street and Bishopsgate and along Bishopsgate, as generally UTCI values stay within the acceptable range for at least 50% of the time.

940. When looking at comfort at ground level, the results show the ground level conditions are predominately categorised as being all season and all seasonal. These conditions are suitable for the intended uses. There are instances of short-term and short-term seasonal conditions at the junction of Wormwood Street, Bishopsgate and Camomile Street, which is associated with the pre-existing windy conditions at the junction.

941. When looking at the comfort on elevated levels, the results show that the raised off-site amenity terraces at 2 Devonshire Square and 100 Bishopsgate are categorised as being all season and seasonal. The terraces at Bishopsgate Plaza are categorised as being a mix of short-term and seasonal.

Configuration 2: Proposed Development with existing surrounding buildings

942. In the Proposed Development with existing surrounding buildings scenario, in the spring there would be alterations to the UTCI values, generally the UTCI values would stay within the acceptable range for at least 90% of the time in most locations (this is similar to Configuration 1), however, along Houndsditch, the UTCI values would stay within the acceptable range for at least 85% of the time. Conditions are worse in the spring at the junction of Camomile Street and Bishopsgate and along Bishopsgate, as UTCI values stay within the acceptable range for at least 80% of the time. In the summer, the UTCI values stay within the acceptable range for at 95% of the time. In the autumn, the UTCI vales generally stay within the acceptable range for at least 90% of time and the worse conditions are at the junction of Camomile Street and Bishopsgate and along Bishopsgate as UTCI values would stay within the acceptable range for at least 80% of the time. As like in Configuration 1, winter is the least comfortable season, the UTCI values generally stay within the acceptable range for at 75% of the time in most locations. Conditions are worse along Houndsditch as UTCI values would stay within the acceptable range for at least 65% of the time and at the junction of Camomile Street and along Bishopsgate UTCI values would stay within the acceptable range for at least 50% of the time.

943. When looking at comfort for off-site ground level conditions, conditions are not predicted to materially change compared to Configuration 1, with most ground level conditions being suitable for the intended use. The short-term seasonal and short-term conditions at the junction of Wormwood Street, Bishopsgate and Camomile Street are similar to those in Configuration 1.

944. There are amenity areas at ground level within the development to the south and west and these will have all-season conditions and therefore suitable for the intended use.

945. When looking at comfort on off-site amenity terraces at 2 Devonshire Square, 100 Bishopsgate and Bishopsgate Plaza, the conditions would either be similar or calmer than in the Configuration 1 and are therefore acceptable.

946. The proposed walkways on the lower levels of the proposed building would have an all season and seasonal comfort conditions and therefore suitable for the intended use. The proposed terraces at Levels 27 and 28 would primarily have a mix of all season and seasonal comfort conditions with a minor instance of short-term in an area that would be landscaped. The proposed balconies would primarily have an all-season comfort condition with instances

of seasonal and short-term. The terraces and balconies would largely be suitable for the intended use expect for the instances of short-term, however, as these are private terraces and balconies, and access can be restricted when conditions are unfavourable, this is considered to be acceptable.

Configuration 3: Proposed Development with Tier 1 cumulative surrounding buildings

947. In the Proposed Development with Tier 1 cumulative surrounding buildings scenario, in the spring and autumn the UTCI values stay within the acceptable range for at least 75% of the time and in the summer for at least 95% of the time. In the winter, conditions are worsened compared to Configuration 2 and this is due to the introduction of the Cumulative Tier 1 schemes, as generally UTCI values stay within the acceptable range for at least 65% of the time in most locations. The worse conditions are along Wormwood Street, at the junction of Camomile Street and Bishopsgate and along Bishopsgate as conditions are in the acceptable range for at least 50% of the time.

948. When looking at comfort for off-site ground level conditions, with the introduction of the Tier 1 cumulative schemes, conditions would generally be consistent with Configuration 2 and be acceptable for the intended use. There would be an increase in the short-term seasonal and short-term conditions along Wormwood Street. These categories are associated with the increase in windiness along Wormwood Street, and as demonstrated by the Future Baseline (Configuration 4) of the Wind Microclimate assessment, this increase in windiness is as a result of the wind interaction with the Tier 1 schemes and not the proposed development.

949. The onsite ground level amenity areas to the west and south would have all-season conditions as like in Configuration 2 and would be suitable for the intended use.

950. When looking at comfort on off-site amenity terraces at 2 Devonshire Square, 100 Bishopsgate and Bishopsgate Plaza conditions would be similar to those in Configuration 2 and are therefore acceptable.

951. The proposed walkways on the lower levels of the building, would have all season and seasonal comfort conditions same as in Configuration 2 and therefore suitable for the intended use. The conditions on the proposed terraces at Levels 27 and 28, as like in Configuration 2, would primarily have a mix of all season and seasonal comfort conditions with a minor instance of short-term in an area that would be landscaped. The proposed balconies would primarily have al all-season comfort condition with instances of seasonal of and short-term. The terraces and balconies would largely be suitable for the intended use expect for the instances of short-term, however, as these are private terraces and balconies, and access can be restricted when conditions are unfavourable, this is considered to be acceptable.

Configuration 4: Proposed Development with Tier 1 and Tier 2 cumulative surrounding buildings

952. In the Proposed Development with Tier 1 and Tier 2 cumulative surrounding buildings scenario, in the spring and autumn conditions are generally similar to Configuration 3, as the UTCI vales stay within the acceptable range for at least 75% of the time and in the summer for at least 95% of the time. As like in Configuration 3, conditions in the winter are worsened compared to Configuration 2 and this is due to the introduction of the Tier 1 and Tier 2 cumulative schemes, as generally UTCI values stay within the acceptable range for at least 65% of the time in most locations. The worse conditions are along Wormwood Street, at the junction of Camomile Street and Bishopsgate and along Bishopsgate as conditions are in the acceptable ranged for at least 50% of the time.

953. When looking at comfort for off-site ground level conditions, with the introduction of the Tier 1 and Tier 2 schemes, conditions would generally be consistent with Configuration 3, and conditions would generally be suitable for the intended use. As like in Configuration 3, the short-term seasonal and short-term conditions along Wormwood Street are associated with the increased level of windiness along Wormwood Street that is as result from the interaction with the Tier 1 schemes and the proposed development.

954. The on-site ground level amenity areas to the west and south would have all season conditions as like in Configurations 2 and 3 and would be suitable for the intended use.

955. When looking at comfort on off-site amenity terraces at 2 Devonshire Square, 100 Bishopsgate and Bishopsgate Plaza the conditions would be similar to those in Configuration 3 and therefore acceptable.

956. The proposed walkways on the lower levels of the building, would have all-season and seasonal comfort conditions as like in Configurations 2 and 3 and therefore suitable for the intended use. The conditions on the proposed terraces at Levels 27 and 28, as like in Configurations 2 and 3, would primarily have a mix of all season and seasonal comfort conditions with a minor instance of short-term in an area that would be landscaped. The proposed balconies would primarily have al all-season comfort condition with instances of seasonal of and short-term. The terraces and balconies would largely be suitable for the intended use expect for the instances of short-term, however, as these are private terraces and balconies, and access can be restricted when conditions are unfavourable, this is considered to be acceptable.

Thermal Comfort Conclusion

957. It is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan policy D8 and D9 and policies S8, S12 and S21 of the emerging City Plan 2040.

Overlooking, Privacy and Overbearing Impact

958. Local Plan policy DM21.3 and emerging City Plan policy HS3 of the emerging City Plan 2040 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 emerging City Plan assess residential amenity and not the amenity of commercial occupiers. Policy D3 of the London Plan requires all new development proposals to deliver appropriate outlook, privacy and amenity.

959. 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 properties.

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

961. The proposed balconies on the southeastern and southwestern balconies, due to their siting and the separation distance to the nearest residential properties, would not result in in overlooking and loss of privacy to nearby residential properties.

962. The proposed terraces on levels 27 and 28 would be situated on the northern side of the proposed building. The closest residential properties are those situated on levels 21 to 41 at One Bishopsgate Plaza; the proposed terraces correspond to approximately to levels 31 to 34 in One Bishopsgate Plaza, 80 Houndsditch. The proposed terraces are for office occupier amenity only rather than being publicly accessible and therefore, it is expected that smaller crowds would occupy them. A condition is also imposed restricting hours or use between 7am and 11 pm. Due to the combination of the siting of the proposed terraces, the usable area of the terrace being set back within a green roof and the proposed landscaping (which would be secured by condition), the proposed terraces at levels 27 and 28 would not result in undue overlooking and loss of privacy to the occupiers of the residential properties at One Bishopsgate Plaza, 80 Houndsditch. Representations have been received in respect of overlooking towards this property, for the combination of reasons set out in this paragraph, it is considered that the development has been designed to avoid overlooking and seek to protect privacy. On that basis, it is considered that the development would be compliant with policy DM21.3(1).

963. The proposed development would result in an increased massing and height on the application site compared to the existing building. Although the proposed development would be located in close proximity to residential

properties (the closest being the residential properties at One Bishopsgate Plaza), it is considered that the nature of the development in the Eastern Cluster, incorporating tall buildings, the proposal would result in no greater impact than that already cause by neighbouring existing tall buildings. It is therefore considered that the proposed development is not considered to cause an undue overbearing impact to nearby residential properties. Representations have been received in respect of the development resulting in an uncomfortable sense of enclosure, for the reasons set out in this paragraph, the proposed development is not considered to result in an overbearing impact to nearby residential properties.

964. The proposals have been designed to avoid overlooking and seek to protect privacy. As such, it would comply with Local Plan policy DM21.3 and CS5 and policy HS3 of the emerging City Plan 2040.

Air Quality

965. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all 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.

966. The Environmental Statement at Chapter 6 and 'Appendix: Air Quality' include an assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development. 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.

967. The development has proposed the installation of a single backup diesel generator. The generator is for life-safety emergency operation only and cannot be used for any level of business continuity, and the applicant has confirmed there is no provision to provide any further generator(s) for tenant use. Alternatives to the diesel generator for emergency power supplies have not been explored, therefore an assessment of alternatives will need to be completed. If installed, the generator should be fitted with mitigation, such as SCR, to reduce NOx emissions to comply with the City of London Air Quality SPD and only tested only in-line with manufacture guidance.

968. The development is Air Quality Neutral, as per GLA guidance, with two blue-badge car parking spaces 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.

969. The initial Air Quality Positive Statement submitted was generic and did not include any measures, that were not already required through local or London Plan policy, to ensure the development pushed beyond compliance. A revised document was submitted, and a condition has been included to ensure successful implementation and monitoring of the proposed measures.

970. The City's Air Quality Officer has no objections subject to conditions in relation to Emergency Power Supply, combustion flues, Air Quality Positive Assessment, and Non-Road Mobile Machinery.

971. Subject to the imposition of these conditions, the proposed development would accord with Local Plan Policy CS15, Policy DE1 of the emerging City Plan 2040, and Policy SI1 of the London Plan which all seek to improve air quality.

Noise and Vibration

972. 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.

973. Chapter 7 of the Environmental Statement and 'Appendix: Noise and Vibration' assess the impact from noise and vibration associated with the proposed development, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in traffic which could be attributed to the proposed development.

974. Noise and vibration resulting from demolition and construction activities has the potential to cause temporary disturbance to surrounding sensitive receptors (SRs), particularly during the course of any below-ground excavation and construction works. Once the Proposed Development is complete and operational, noise associated with new building services plant, changes in road traffic and ancillary servicing areas all have the potential to change the noise levels, which could affect occupants at neighbouring properties.

975. The Environmental Statement identifies the following receptors that would be sensitive to noise and vibration from the proposal (the sensitive receptors):
- SR1 - Commercial (South Façade, 106-107 Houndsditch);
- SR2 - Commercial (North-West Façade, 70 St Mary Axe);

- SR3 - Commercial with rooftop amenity space (North Façade, 100 Bishopsgate);
- SR4 - Commercial with rooftop amenity space (South-East Facade, 110 Bishopsgate); and
- SR5 - Hotel & Private Residential (South Façade, Pan Pacific Hotel, 80 Houndsditch).

976. In most City redevelopment schemes the main noise and vibration issues occur during demolition and construction phases. In respect of construction noise levels and resultant effects the impact is deemed to be Not Significant at all receptors.

977. In respect of demolition and construction vibration, the assessment identifies that there is a possibility of experiencing a low magnitude of impact in relation to vibration resulting in a short-term, Minor Adverse effect (Not Significant) in terms of human Perception to SR2. All other SRs would experience negligible effects (Not Significant).

978. In respect of traffic noise and during the deconstruction and construction phases, it is anticipated that a peak in construction vehicle movements of 74 daily (less than 8 per hour) would occur, spread over the working day. This would be expected to equate to an increase in road traffic noise of less than 1 dB on roads surrounding the Site (negligible magnitude of impact). The effect is considered Negligible, short-term, local, and therefore Not Significant.

979. Noise and vibration mitigation during deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Scheme of Protective Works to be secured by condition, and freight movements would be controlled through the Deconstruction and Construction Logistics Plans, 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.

980. The Environmental Statement concludes that operational traffic noise associated with the proposed development would be negligible and not significant for all sensitive receptors.

981. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below the background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.

982. Conditions are proposed to be attached in respect of the hours of use of the cultural centre, music and promoted events.

983. The majority of deliveries and servicing will be secured by condition to take place from the on-site loading bay overnight between 11pm to 7am. However, for refuse collections including glass, this will be restricted to be between the hours of 8pm and 11pm by condition to prevent amenity harm from the nosier nature of this type of servicing.

984. The submission considers the noise and vibration impacts of development on the environment. Subject to a series of conditions to mitigate noise and vibration during deconstruction and construction and operational phases of development, the proposed development would comply with Policies D13 and D14 of the London Plan and policy DM15.7 of the local plan and Policy HL3 and HS3 of the emerging City Plan 2040.

Contaminated Land

985. Local Plan policy DM15.8 and draft Policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

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

987. The application is accompanied by a Preliminary Risk Assessment, prepared by Soiltechnics, which assesses the impact on ground conditions associated with the proposed development, including potential effect on human health, surface and groundwater, sensitive ecosystems and species, and property.

988. The PRA identifies potential contaminant linkages which require further investigation through intrusive methods. The City's Environmental Health Officer requested conditions that require a detailed site investigation be completed prior to commencement of development to identify potential for contamination, an investigation and risk assessment prior to construction, and, if this finds the potential for contamination, that intrusive investigations are required to provide information to support a suitable remediation strategy and mitigation measures.

989. Thus, overall, subject to condition the proposals are in accordance with Policy DM15.8 of the Local Plan and Policies S1 and HL4 of the emerging City Plan.

Sustainability

CoL Planning for Sustainability SPD (February 2025)

990. 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 developments should approach environmental sustainability. It provides 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 only apply to applications submitted after its adoption. Although the requirements of the SPD do not apply to the Proposed Development at 63 St Mary Axe, 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. The scheme is considered to be in general compliance with the actions recommended in the SPD, with the exception of the extent of basement proposed (6 storeys). Basement construction is strongly encouraged to be kept to a minimum due to the high carbon impact associated.

Circular Economy:

991. 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 Table at page 133 of the Local Plan states that one of the means of delivery of the Sustainable Development and Climate Change policies is to engage in pre-application discussions to explore opportunities to avoid demolition. Policy DM 17.2 of 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.

992. 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.

993. The redevelopment appraisal concluded that retention of the existing structures would significantly limit the opportunities of the site:

- to develop the lower ground levels into a best-in class environment

- providing public amenities
- significant improvements to the public realm including extensive greening and greater accessibility

- to deliver maximum potential for densification/new office floor space, particularly given the site's location in the eastern cluster, an area designated for tall buildings.

994. The application proposal is for full demolition of the existing buildings and a substantial new replacement building. Full redevelopment enables the site to fulfil maximum site potential in terms of office floor space, operational performance, greening and climate resilience as well as social and economic benefits.

Existing Buildings

995. There are two buildings on site originally constructed in the late 1980s:

63 St Mary Axe – a reinforced concrete frame building (12m x 6m grid) originally constructed at 6-storeys with single basement level was extended with a steel frame to 9 storeys in 2011. The extension maximized the existing structural loading capacity.

Camomile Court - concrete and steel framed building (8.5m x 8.5m grid) with 2 basement levels. The latest refurbishment was in 2008.

996. The ground and first floors of both buildings are clad in smooth granite whilst the second to sixth floors are clad in Portland stone, with original double glazing and an aluminium stick framing system.

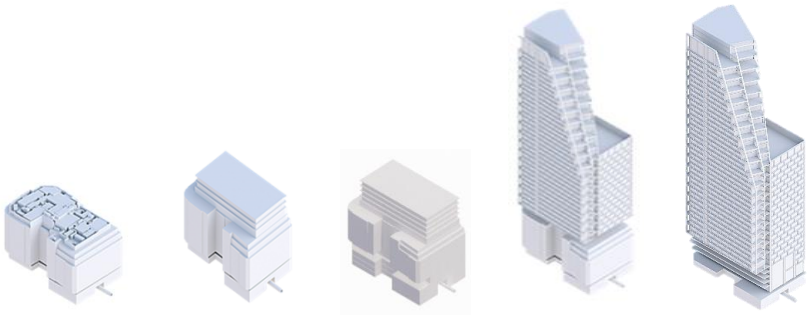
Carbon Options:

997. A carbon 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.

998. A total of 5 development options, were considered as summarised below:

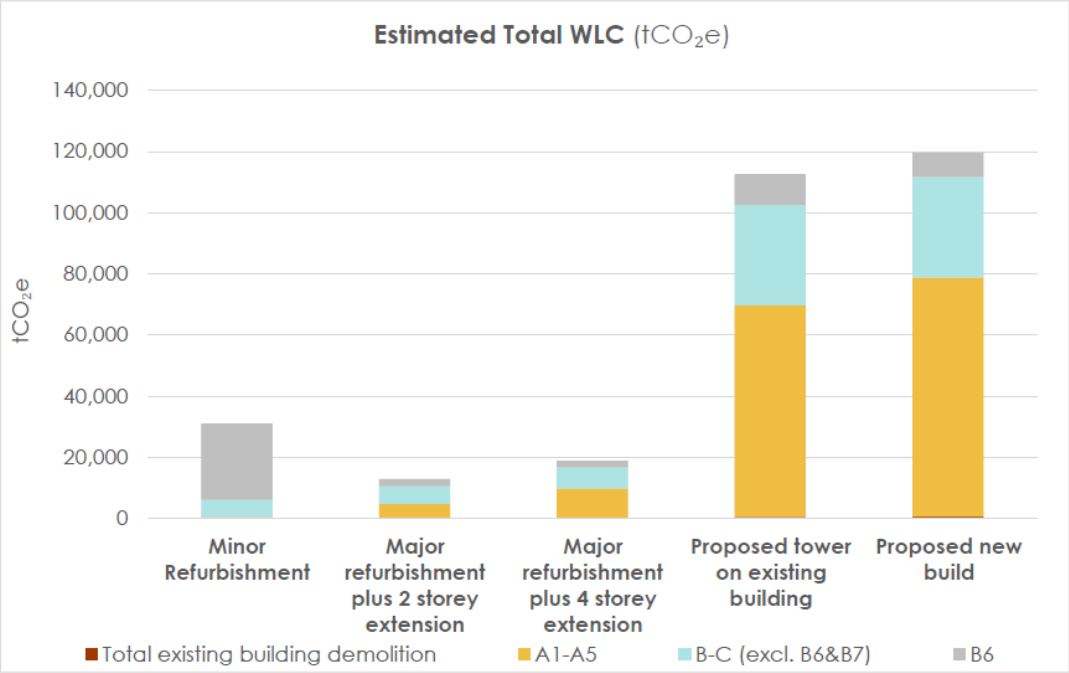
- Option 1 - Minor Intervention to existing building; 14,510m2 GIA
- Option 2a - Major refurbishment and partial 2-storey extension. Upgrades to existing facade, internal finishes and MEP to improve operational performance and provide all-electric systems; 16,638m2 GIA
- Option 2b - Major refurbishment and part 2, part 4 storey extension. Significant modifications to the foundations would be required. Lower floors opened up to improve the public realm. All new façade, internal finishes, and fully electric MEP; 19,645m2 GIA

- Option 3 - Proposed tower on existing building; New internal finishes and all electric MEP to upgrade operational performance; 93,428m2 GIA
- Option 4 - New development. Retention of existing substructure basement box and piled foundations (20% of existing substructure); 93,428m2 GIA.



	Option 1	Option 2a	Option 2b	Option 3	Option 4
Gross Internal area (GIA) m²	14,510	16,638	19,645	93,428	93,428
Increase in GIA (over existing)	0	2,128	5,135	78,918	78,918
Substructure % retained (by mass)	95	80	70	50	20
Superstructure % retained (by mass) (*frame, upper floors, roof, stairs, ramps*)	100	80	60	25	0
Superstructure % retained (by area) (*external walls, windows, external doors*)	100	60	0	60	0
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *exc. sequestration*	**39**	**282**	**485**	**741**	**837**
In-use & End of Life Embodied Carbon (B-C) ($kgCO_2e/m^2$ GIA) *excl. B6 & B7*	390	351	351	351	351
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	**429**	**633**	**836**	**1,092**	**1,188**
Fuel source	Electricity	Electricity	Electricity	Electricity	Electricity
Whole Building Operational Energy Use (kWh/m^2 GIA per year)	268	90	70	70	55
Whole Building Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	**1,716**	**138**	**108**	**108**	**85**
Target EPC rating	C	B	A	A	A
Total WLC Intensity (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) *B7 not considered*	**2,145**	**780**	**958**	**1,205**	**1,280**
Upfront Embodied carbon (A1-A5) (tCO_2e)	566	4,692	9,528	69,230	78,199
In-use embodied carbon (B-C) (tCO_2e)	5,659	5,840	6,895	32,793	32,793
Operational carbon for building lifetime (B6) (tCO_2e)	24,904	2,300	2,112	10,045	7,893
Total absolute WLC (incl. B6 and pre-demolition) (tCO_2e) *Module B7 not considered*	**31,129**	**12,977**	**18,826**	**112,613**	**119,611**

Extract from the Carbon Options Guidance dashboard comparing total WLC tonnage for each option



999. Key constraints of the existing building:

- With limited existing public realm and poor permeability across the Site, substantial alterations to the existing buildings' façade would be required to activate the ground floor.
- Floor level difference between the two buildings (60-250mm) makes connection across floor plates or extension spanning both buildings challenging. Existing level difference, ceiling heights and core location result in sub-optimal internal layout/occupant experience and don't meet highest grade office expectations
- There is limited scope to increase floor area without significant structural intervention with significant programme and carbon impact. 63 St Mary Axe was extended by two floors previously (2011), and it is assumed the existing foundations would not be able accommodate further floors within their current load capacity.

1000. With only minor interventions to the existing fabric Option 1 has the lowest upfront embodied emissions but the highest overall emissions rate per m2 due to poor operational performance of building fabric and MEP systems.

1001. Options 2a and 2b include upgrades to the existing fabric and MEP equipment resulting in significantly improved operational performance. Option 2a has minimal intervention to existing structure. A small 2-storey extension (c. 2000m2) on Camomile Court is possible without exceeding the existing structural loading capacity. It was concluded that an additional 4 storeys would not be possible without significant strengthening to existing

foundations/structure causing much additional build complexity and embodied carbon, making Scenario 2b an unviable option. WLC emissions of Option 2 are only 11% of Option 4.

1002. Option 3 and 4 are able to provide substantial social and economic benefits, due to the significant uplift in floor area, however, retention of the existing building severely limits the public realm improvements possible in Option 3. Option 3 would also require such extensive strengthening to the existing substructure and core that the embodied carbon benefits of retention would be nullified. Carbon savings compared to Option 4 are only 6-7% (per m2 and absolute). Option 4 is the developer's preferred option but also has the highest carbon by a significant margin (apart from option 3). However, Option 4 directly responds to the City's planning and strategic policies including office floorspace requirements, provides the greatest public offering, and highest quality office space. Option 4 is also able to provide significantly more urban greening and biodiversity including development of one of the City's Cool Routes (see Cool Routes Section later in the report) and better climate resilience through reduced urban heat island effect, water management and improved mitigation against overheating.

1003. The development proposal is derived from Option 4, full redevelopment. The key difference is the introduction of an additional 3-storeys of basement (increase from 3 to 6 storeys) in order to accommodate plant and to meet the cycle parking and end of trip facilities requirements of the London Plan. It is not possible to locate cycle parking above ground due to the provision of generous public realm and public amenity provision across ground floor, and levels 01 and 02. Embodied carbon emissions for the development proposal would be considerably higher than Option 4 due to the extent of additional basement – estimated at an additional 15 kgCO2e per m^2.

1004. Key reasons the full redevelopment option was brought forward include:

- Significantly more floor area (376% greater GIA than Option 2a)
- Greatly improved public realm offering, with better accessibility, and generous greening across multiple levels
- Most efficient floor layout and floor heights, enabling best longevity, flexibility, operational energy performance and letability
- Enhanced indoor air quality and natural daylighting to all areas providing best health and wellbeing attributes
- Improved climate resilience through reduced urban heat island effect, water management and improved mitigation against overheating.

Development Proposal

1005. The application proposal is for full demolition of the existing buildings. According to the Pre-Demolition Audit (PDA), given the age, structure type and composition of the buildings, opportunities for reuse are considered to be extremely limited. This is due to:

- Existing buildings were not constructed in a manner which facilitates disassembly
- Due to their age, elements such as windows and glazing are not anticipated to meet current building regulations.

1006. The Pre-demolition audit identified substantial amounts of concrete, steel, carpets/vinyl/flooring, bricks, steel, mixed metals, timber and glass to arise from the demolition process and provided recommendations to maximise the potential reuse opportunities of existing materials. Elements identified as having the greatest potential for reuse are:
- Fit-out materials such as raised access flooring, ceiling panels, lighting, bike storage and lockers

1007. The audit identified the following key demolition products as having high potential reuse value and recommended further investigation at detailed design stage:
- Bricks - subject to condition survey
- Structural steel - Upon engagement, the contractor, will be required to establish potential reuse opportunities
- Stone cladding - subject to condition survey
- MEP equipment – engagement with manufacturers required

1008. The applicant will engage with the supply chain and in early discussions with potential contractors to ensure avenues for the highest value reuse are explored.

1009. The development has committed to the following measures to address construction waste and embed circular economy principles:
- Targeting a minimum 20% recycled content (by value) across whole building. This target is to be included within the contractor's appointment.
- Structural efficiency and standardisation
- Material efficiency of building services – commitment through BREEAM Mat06 credit

1010. The following additional measures are proposed subject to further assessment at detailed design stage:
- Use of Material Passporting
- Crushing, grading and re-use on site of concrete arising from demolition
- Targeting materials with Environmental Product Declarations (EPD)s and a high recycled content including specifications for concrete with 20-60% GGBS and Electric Arc Furnace (EAF) re-bar.

1011. It is worth noting that procuring large quantities of GGBS and EAF steel can be challenging/expensive in the current market. The potential impact of these

elements is discussed in more detailed in the Whole Life-cycle carbon section below.

1012. The Circular Economy Statement outlines the circular economy targets and commitments of the proposed development. Key proposals are set out below:

Component or material reuse

- Standardised components/structural element sizes

Adaptability / flexibility

- Standardised structural grids allowing for easier reconfiguration of space
- Soft spots in grids to enable future vertical penetrations such as stairwells, elevator shafts, or services voids
- Provisions have been made to allow for additional opening windows in the future, enhancing the building's adaptability to changing internal layouts or occupancy needs.
- Future proofing capacity -The services infrastructure has been designed to include additional MEP capacity to support high-load uses and dedicated tenant's risers and plant space to provide tenants with the ability to install supplementary systems

Disassembly / replaceability

- Steel frame with mechanical fixings
- Unitised façade and window systems to allow ease of replacement
- MEP equipment designed to be readily accessible for ease of maintenance and replacement

1013. The strategic objective of Local Plan Policy CS15 (and emerging City Plan 2040 Policy S8) of avoiding demolition has been addressed through the exploration of development options which retain the existing buildings. This pre-redevelopment appraisal was conducted in line with the CoL's Carbon Options Guidance and reviewed by a 3rd party. The appraisal determined that to maximise the value of the site, best meet the client brief and address other strategic objectives of the City including growth, delivery of high quality office floor space and public amenities and improving climate resilience, full demolition was necessary.

1014. The Proposed Development addresses the circular economy principles set out in London Plan policy SI 7, with a design that is durable, adaptable and facilitates future maintenance and eventually disassembly. Whilst opportunities for material reuse are limited, the development proposal is targeting high recycling rates and high levels of recycled content in new materials, measures which reduce the embodied carbon emissions of the development supporting the schemes compliance with policy SI2. Encouraging the reuse of existing resources is also a key consideration of Paragraph 161 of the NPPF.

1015. A revised circular economy statement at detailed design stage (pre-commencement) is required by condition with specific reference to maximising the reuse value of demolition materials based on the opportunities set out in the pre-demolition audit to address the significant construction waste which would result from full demolition. A post construction update to the Circular Economy statement is also required by condition.

Operational energy strategy and related emissions

1016. 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

1017. 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 using energy efficiency measures alone (*Be Lean*)
- 35% overall reduction

1018. 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.

Table 1: 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)	550	-	-
Be Lean: Demand reduction	394.8	155.2	28%
Be Clean: Decentralised energy	394.8	0	0
Be Green: Low/zero carbon technologies	370.4	24.4	4%
Total reduction			33%

1019. The operational emissions are expected to result in 1,302 kg CO2/m2, which amount to 132,122 tonnes CO2e over a 60-year period.

Energy Strategy

Be Lean:

1020. 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 glazing ratios, of 31% to 60% across different facades, limiting peak solar gains to 40 W/m2 in line with BCO Guidance
- Passive and mixed-mode ventilation - office floors are designed to operate with natural ventilation during mid-season conditions, supported by automated window actuators and an integrated building management system (BMS) which enables the building to switch between mechanical and natural ventilation based on internal and external conditions significantly reducing reliance on active cooling systems
- Night purging - cool air is drawn through the space overnight to pre-cool the internal thermal mass. This reduces the morning cooling load and delays the need for mechanical cooling during the day
- External shading provided by structural elements of façade design and set back of windows. Performance optimised through early-stage parametrical modelling
- Exposed thermal mass of concrete slabs act as a heat sink to mitigate peak heating/cooling loads
- 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
- Photovoltaic panels at roof level
- Smart energy/building management systems and controls

1021. The development achieves a 28% emissions reduction against Part L at 'Be Lean' stage which is above average compared to other commercial developments recently approved in the City and considering the use class and proposed u-values/curtain walling system. This is primarily attributed to the mixed-mode ventilation strategy, and associated night purging, accounted for in the modelling mean the actual estimated cooling demand is 90% lower than the notional (7 kWh/m2/yr compared to 72kWh/m2/yr). Night purging results in a 10% reduction in cooling load and openable windows provide a further 8% saving on overall energy.

Be Clean:

1022. The applicant has consulted the City Surveyors and relevant network providers to discuss existing and proposed heat networks. At present there are no district heat networks (DHN) in the area that the proposed development

can connect to. The applicant has provided commitment that the development will be designed to allow future connection to a district heating network. The design shall include:

- a single point of connection to the district heating network
- space allocated for heat exchangers
- 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

Drawings/documentation demonstrating how the development meets these requirements will be secured by condition.

Be Green:

1023. 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 with thermal storage and heat recovery will provide heating, cooling and hot water for office areas. Where possible, the ASHPs will utilise refrigerants with low Global Warming Potential
- The development includes ~42m2 of photovoltaics (PVs), located on the roof, providing an estimated yield of 8,507 kWh per annum. Roof area for PV is limited due to competing needs of plant and amenity space as well as the tapered form of the tower.

1024. Emergency backup power is by a diesel generator which is being provided for life safety systems only. An alternative battery solution is not feasible due to the significant size of the pumps being supported for sprinkler and wet riser.

1025. Under the 'Be Green' stage a 4% reduction in carbon emissions is achieved.

Overall Target

1026. The development proposal would achieve a 33% reduction in regulated CO2 emissions overall, representing only a 2% 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. Equal or improved performance will be secured by condition.

Cooling Hierarchy

1027. 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:

Minimising internal heat generation:

- Use of energy-efficient lighting and equipment.

- Maximise use of daylight
- Optimised building management systems.
- Minimise and strategically locate pipework.

Reducing heat entering the building:

- External shading provided by structural elements of façade design and set back of windows
- High thermal performance building fabric
- Glazing specifications derived from thermal comfort analysis considering solar gains targets, orientation, and exposure per floor. 48% average window-to-wall ratio.

Managing heat within the building:

- High level of exposed thermal mass for office floors acts as a heat sink during nighttime (night purging), reducing peak demand during the day

Passive / mixed mode ventilation:

- Openable windows with actuators allowing automatic control. Mixed-mode ventilation employed to reduce energy demand. Facade design has accounted for potential future openings, ensuring that additional opening windows can be added without significant modifications.

Mechanical Ventilation:

- Amenity levels, Ground Floor to Level 03, will be served by local mechanical ventilation units typical fan coil units at high level.

Active cooling (low carbon):

- Minimised through passive measures. When required, cooling is delivered to the building by highly efficient air-cooled chillers with a seasonal energy efficiency rating (SEER) of 4.69.

1028. 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 designed to adapt to rising temperatures while minimising energy consumption and carbon emissions.

EUI and Space Heating Demand:

1029. The adopted GLA Energy Assessment Guidance (2022) requires developments to calculate space heating demand and Energy Use Intensity (EUI) - a measure of a building's total annual energy consumption which includes regulated and unregulated energy. For offices, the GLA benchmarks are 55 kWh/m2(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.

1030. The project is employing a NABERS Design for Performance (DfP) approach to optimise whole building operational energy performance. At Stage 2, the whole building EUI is estimated at 73 kWh/m^2/year (GIA), falling short of the GLA target but bettering the UKNZCBS target. 73 kWh/m2/year is the lowest EUI of the six office buildings over 30 storeys approved in the City in the past 2 years. For the base building the project is estimated to achieve an EUI of 69.3 kWh/m2/year (NIA), equivalent to a NABERS 5* rating.

1031. The estimated space heating demand is 23.5 kWh/m^2/year (GIA) which fails to meet the GLA benchmark. The applicant has explained that the building's unique massing likely plays a significant role. The upper floors are quite narrow, resulting in a high ratio of exposed façade area to floor area, which increases heat losses. With cooling being the dominant load in this building, priority was given to reducing cooling demand through the natural ventilation strategy achieved through openable windows. Openable windows require more framing, and frames generally perform worse thermally (i.e. have higher U-values) than both glazing and solid wall elements. As a result, buildings with openable windows typically experience a higher overall heat loss rate compared to those with sealed glazing units. The predictive modelling was undertaken on a Stage 2 model so remains an early estimate. Currently, the control strategy is the same year-round. The design will look to introduce seasonal controls to enhance cooling in summer and prevent unwanted heat losses whilst the building is in heating mode. Set points will also be adjusted to improve efficiencies. Once the control strategy has been further developed, the applicant expects the heating demand to decrease considerably.

Conclusion for Operational energy performance

1032. The application demonstrates a wide range of measures taken to optimise energy efficiency in the development balancing daylight and overheating, employing passive ventilation and thermal mass, and using energy efficient and low carbon building systems. The development is considered to comply with the requirements set out in London Plan policies SI2 and SI4, Local Plan policies DM15.2 and DM15.3.

1033. 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 GLA's zero carbon target in the London Plan.

Whole Life-cycle Carbon:

1034. The GLA Whole Life-cycle Carbon Assessment (WLCA) Guidance requires referable schemes to use the original (1st edition) assessment methodology

developed by RICS (Royal Institution of Chartered Surveyors). RICS have since published a 2nd edition which came into full effect on 1st July 2024. The GLA has indicated that it would not update its guidance to reflect the changes made in the 2nd Edition for now.

The update methodology of the RICS 2nd Edition includes:

- a mandatory early design contingency factor (15% across most building elements) to account for uncertainties related to design elements that may develop further during subsequent RIBA stages
- requirement to report of emissions from preconstruction demolition and refrigerant leakages
- changes to modelling items such as baseline material assumptions, transport distances and waste rates

1035. WLCAs which follow RICS 2nd Edition guidance are typically more accurate and present higher carbon emissions than those following 1st Edition guidance primarily due to the 15% contingency and additional elements being reported.

1036. The WLCA submitted for the Proposed Development follows the RICS 2nd Edition guidance meaning that the figures include a 15% contingency factor. The results are set out in the table below, against the GLA benchmarks. These benchmarks do not account for the 15% contingency factor, inclusion of preconstruction demolition and refrigerant leakages or revisions in assessing transportation distances. Therefore, comparison of the Proposed Development's embodied carbon performance against the GLAs current WLC benchmarks should be assessed with this in mind .

1037. Total WLC emissions of the proposed development over a 60-year period are estimated to be 271,512 tCO2e (2,676 kgCO2e/m2 GIA) (inc. B6-B7, and sequestration). Operational carbon (B6-B7) accounts for 49%, lifecycle embodied carbon 51%, and upfront embodied carbon (A1-A5) 35% of total WLC emissions.

Floor Area = 101,460 m^2 GIA		Carbon Intensity (kgCO2e/m^{2}GIA)		
Stages	Life-cycle Carbon Emissions (tCO2e)	Development proposal	GLA standard benchmark	GLA aspirational benchmark
Upfront Embodied carbon (A1-A5)	95,883	945	950	600
In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7)	45,088	444	450	370
In-use Operational carbon (B6-B7)	132,122	1302	-	-
Life-cycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	140,120	1382	1400	970
Whole life-cycle carbon (A-C, incl. B6-B7 inc. sequestration)	272,322	2,684	-	-

1038. Key aspects of the design which support material and carbon efficiency include:

- Structural efficiency and standardisation - Lean design principles have been maximised throughout, focusing on floor plates and vertical structure. Floor/columns grid studies have been undertaken to optimise space flexibility, project brief, architectural vision and structural efficiency. The structural design is based on a modest column grid (9x7.5m) and a lean post-tensioned concrete slab, which reduces the quantities of materials needed for upper floor slabs. The repetition of floor layouts enables standardization of steel elements, thereby reducing off-cuts and waste. Proposed use of HISTAR structural steel reduces overall steel weight.
- Targeting materials with Environmental Product Declarations (EPD)s and a high recycled content.
- Specification of low carbon materials:
    - Cement replacement in concrete – currently set at 70% GGBS for substructure and 30% GGBS for post-tensioned slabs
    - Electric Arc Furnace (EAF) steel for structural frame and re-bar. HISTAR structural steel also reduces overall weight of the structure.
    - Steel connections and perimeter composite columns - 60% recycled content.
    - Aluminium façade panels with recycled content
- Standardized façade bays - reducing wastage in manufacturing.

1039. The applicant has also committed to produce sustainable fitout guides and green leases to encourage tenants to reduce their carbon impact.

1040. Further carbon reduction opportunities identified for exploration during the developed design phase, include:

- Pre-cast facade system over unitised façade, reducing aluminium framing and associated metal sheeting
- A change in concrete casting technique for core walls (jump form instead of slip form) allowing up to 30% cement replacement (0% cement replacement currently proposed)

1041. The current design includes 6 levels of basement to accommodate a variety of services and equipment to operate the building. 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.

1042. During design development, a number of water-cooled chillers and pumps were relocated from the basement to roof level to eliminate 1,500m3 basement

excavation dig and to reduce steel pipework by 350 meters of 400mm diameter steel. The applicant has stated that further optimisation of basement space will be prioritised during detailed design stage. The majority of the substructure is proposed as using a concrete mix with 70% cement replacement (GGBS) which results in substantial carbon savings over traditional concrete mixes. These carbon savings are already factored into the WLCA. If these levels of cement replacement cannot be achieved at procurement stage, the carbon impact will be very significant.

1043. The submitted WLCA shows the embodied carbon emissions for the Proposed Development achieving the Standard GLA benchmarks, but considerably higher than the Aspirational Targets. Some of the key carbon reduction measures included in the design specification carry a moderate procurement risk, specifically the HISTAR EAF steel, low carbon aluminium (50% recycled content) and higher-than-typical volumes of cement replacement (GGBS).

1044. The range of GGBS specified has been validated by the project's structural engineer, and balances viability and programme across the different building elements. Procurement of GGBS will be discussed with the contractor at the next stage of design and the applicant will explore alternative cement replacements.

1045. If Electric Arc Furnace (EAF) steel can't be procured for the structural frame and a standard specification steel (Blast Oxygen Furnace with 20% recycled content) is used, the increase to upfront embodied carbon would be 89 kgCO2e/m2 (9% of total per m2 upfront embodied carbon) or 9,030 tCO2e total.

1046. The WLCA was reviewed by a third-party consultant. The reviewer noted the reliance on the procurement of certain low-carbon materials (such as EAF steel and high % GGBS concrete) to achieve the GLA benchmarks but found the assessment to be technically sound.

1047. A detailed design stage Whole Life-cycle Carbon Assessment demonstrating achievement of at least the GLA Standard benchmarks and a confirmation of the post construction results are required by conditions.

BREEAM

1048. The office spaces will be assessed under BREEAM UK New Construction 2018 (V6) as a shell and core project while the retail spaces will be delivered under a single, shell only, BREEAM 2018 (V6) assessment. The applicant is targeting BREEAM 'Outstanding' for the office areas, whilst the retail areas target an 'Excellent'. Due to the limited works being undertaken in the retail areas – shell space ready for building services and local equipment fit-out by prospective vendors - Ene 01 performance credits will be challenging to achieve and as a result the applicant considers an Excellent rating most appropriate.

1049. The pre-assessment scores for both office and retail areas include comfortable buffers over the minimum score threshold required for the target ratings.

1050. 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.

1051. The Wst 05 credit – Adaptation to Climate Change is targeted as required by the Local Plan.

1052. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and emerging City Plan 2040 Policy DE1. A post-construction BREEAM assessment is requested by condition.

Urban greening and biodiversity:

Urban Greening

1053. 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.

1054. The landscaping proposal will comprise a network of trees underplanted by shrubs and perennials, providing arboreal connectivity and biodiversity habitats across the tower building.

1055. The key enhancements include:

- Extensive ground floor landscaping with mature trees, climbing plants, and planters;
- Green roofs at levels 27 & level 28;
- Soft landscaping on corner terraces at Southeast and Southwest elevations;
- Species habitat provision: such as bird and bat boxes, and areas dedicated to support invertebrates.
- 76 trees including on corner balconies

1056. Landscaping proposal outline:

- Public realm: characterized by tall trees, grouped with smaller multi-stem woodland trees. Trees have been selected for their biodiversity benefits (with half the trees native or cultivar of native trees), shade tolerance and

beauty. Trees will be underplanted with vegetation of the open woodland, alongside evergreen shrubs, woodland grasses, ferns and perennials. Climbing plants will be planted up the public space below the building canopy, and along the external walkways that link levels 0 to 5, selected to suit the light levels, with flowering plants provided on facades receiving daylight.

- First to Fifth Floor - the external walkways and balconies gardens will comprise shade tolerant planting mixes.
- Corner Terraces - Levels 06 to 22: From level 6 upwards, each floor will have access to at least one corner terrace planted with a tree. Each tree will site in a minimum of 5 cubic metres of soil to ensure space for future root growth. Trees will be underplanted with shrubs, including some evergreens. Trees have been selected which provide seed and small berries eaten by birds. From level 23 upwards, wind resistant tree species which provide suitable habitats for birds, bees and butterflies, have been selected.
- Roof Garden Level 27 - generously planted with shrub and perennial planting and meadow planting mixes. All planting selected to be sun-loving, drought tolerant, nectar and pollen-rich to encourage biodiversity. The paved area has 'blue roof' water storage below.
- Roof Garden Level 28: Semi-shaded space with four multi-stem trees underplanted with low shrubs, grasses and perennials.

1057. The landscaping proposal covering an area of 2,495m2 achieves an Urban Greening Factor of 0.58 which exceeds the London Plan Policy G5 target of 0.3 for office developments.

Biodiversity

1058. 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).

1059. The proposed greening intervention will align with the City of London's' Biodiversity Action Plan (BAP) through the provision of a wide diversity of habitats. The provision of targeted nesting aids for species such as house sparrows, black redstarts, swifts, and wild bees will also align with the BAP.

1060. According to the baseline assessment the site baseline is 0.02 biodiversity units. The proposed measures would deliver on a conservative basis, a total of 1.10 habitat unit or 2.83 BU/ha. The unit increase of 6943.64 % satisfies the statutory requirement of 10% BNG however the units per hectare rate falls slightly short of the emerging City Plan target. Species mix, tree selection and

opportunities to tailor the green roof habitats to increase biodiversity will be explored during detailed design stage.

Cool Routes

1061. The City's Climate Action Strategy established a Cool Streets and Greening project to improve the climate resilience of streets, parks and open spaces. This included the designation of Cool routes across the Square Mile that aim to offer a comfortable pedestrian experience. These routes prioritise the growth of biodiversity and the provision of shading (preferably by trees).

1062. The development is one of the first to submit a report covering a Cool Routes strategy. The report details how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate and passes through the site.

1063. As the existing highways pavement is crowded with below ground utilities, retrofitting trees is difficult. The proposed solution is to plant trees below the building's canopy, on land that is relatively free of existing services. Planted into large soil trenches, and underplanted with shrubs, grasses, ferns and perennials, evaporation from tree and plant leaves will create a cooler microclimate. The site also includes a publicly accessible drinking fountain.

1064. This contribution to a Cool Route which would improve climate resilience and public wellbeing is considered a wider environmental sustainability benefit helping mitigate the development's life-cycle carbon emissions in line with the guidance of the Planning for Sustainability SPD.

Overall

1065. The landscaping strategy is detailed and well considered. It would provide generous publicly accessible green and biodiverse spaces at levels 0 to 4, greening including trees at all levels and support the development of a Cool Route. 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

1066. Based on the current details, all studied zones meet the thermal comfort requirements for the DSY1 weather file without any additional mitigation strategies. All areas have also been assessed against future DSY2 and DSY3 weather files, which shows that with the recommended glazing in place (i.e. with maximum g-values of 0.28), all areas meet the thermal comfort

requirements as well as achieving both credits for BREEAM Hea 04 Thermal comfort.

- Recessed windows would prevent overexposure to direct sunlight;
- Openable windows and maximized opportunities for natural ventilation and night purging to minimize the impact of temperature variation;
- Landscaped roof terraces would provide natural cooling and shading to the building
- Specification of facade materials with low thermal conductivity and high frost resistance
- The facade design has accounted for potential future openings, ensuring that additional opening windows can be added without significant modifications.

Urban Heat Island

1067. In line with Policy G5 of the Local Plan and Policy CR1 of the draft Local Plan, the building has been designed to minimize contributions to the urban heat island effect as far as possible, by integrating vegetation on every floor to improve evaporative cooling with terraces at each level containing at least one tree and shrubs.

Flooding

1068. The application is supported by a Flood Risk Assessment (FRA) and a Sustainable Urban Drainage Strategy to manage surface water run-off in line with London Plan Policy SI13. The site lies predominantly within Flood Zone 1 an area with a probability of flooding less than 0.1% each year. Below-ground storage systems and sustainable urban drainage systems will be used at source to attenuate runoff to the greenfield rate (0.95 l/s) prior to discharge into the public sewer network resulting in a positive reduction in flood risk. Proposed measures include:

- blue roofs with an 80m2 storage capacity
- an attenuation tank in the basement with a 35m2 capacity
- rainwater harvesting tank at levels 15/16.

Water Stress

1069. The development includes a range of measures to minimise mains water consumption:

- Water efficient fixtures and fittings targeting a minimum 50% reduction in potable water consumption over a baseline specification - in accordance with BREEAM Wat01 methodology.
- rainwater and greywater harvesting - in line with London Plan Policy SI5
- Automatic metering, a mains water leak detection system and sanitary shut-off valves to all WC areas to mitigate any risk of water leaks.

- SuDS have been incorporated into the landscaping strategy as far as reasonably practicable. A combination of blue roofs at roof/terrace level, deliver a total 115 m^3 storage, with greywater used to irrigate the proposed landscaping.

Overall Climate Resilience

1070. The building design responds well to climate change resilience by minimising overheating risk, saving water resources and incorporating high levels of urban greening and biodiversity. The development proposal is supported by an Adaptation to Climate Change report which addresses the requirements of the BREEAM Wst 05 credit. The report does not address all of the key climate related risks within the Square Mile as identified in the City's Climate Action Strategy and Adaptive Pathways study. A Climate Change Resilience Sustainability Statement will be required pre-commencement with an update post completion, both secured by condition.

Conclusion

1071. 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 of London Corporation's Local Plan 2015, and the draft City Plan 2040.

1072. The strategic policy and objective of avoiding demolition through the re-use of existing buildings or their main structures has been achieved by exploring opportunities to avoid demolition through the options analysis. The proposed development optimises the delivery of highest quality office floorspace while integrating greening at all levels and enhanced public amenities. This is particularly notable at the street level, where full development facilitates a transformed public realm with better circulation and accessibility, generous greenery, community and retail uses across multiple levels, benefits which could not be delivered through retrofit where extension and opening up potential was significantly limited, as demonstrated in pre-redevelopment analysis. Whilst the opportunities for material reuse (in-situ and off site) are limited, the scheme embraces forward-looking circular design principles - prioritising longevity, adaptability, and low maintenance - while achieving a c. 480% increase in office space.

1073. The development achieves the GLA standard benchmarks for upfront and life-cycle embodied carbon through a mixture of lean design and low carbon material specifications. The energy strategy has been optimised for the site, prioritising passive measures to significantly reduce operation energy use and the associated carbon emissions. Through the design of the façade, and incorporation of mixed-mode ventilation and night-purging the development would achieve a leading reduction in cooling demand. Excellent operational energy performance is further demonstrated through the targeting of a NABERS UK rating of 5 stars and a BREEAM 'Outstanding' rating for the office areas. The proposal comes close to meeting the London Plan target of 35%

operational carbon emission savings despite the stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. Offset payments will be made to mitigate the shortfall to reach the net zero carbon target. Although it cannot avoid demolition in accordance with Policy CS15(3), it complies with (taking account of the mitigation measures proposed) London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The energy strategy also addresses paragraph 161 of the NPPF by minimising overheating risk and supporting renewable and low carbon energy contributing to a significant reduction in operational emissions.

1074. The building design responds well to climate change resilience by minimising overheating risk, reducing flood risk and saving water resources through rainwater harvesting and greywater recycling, and SuDS including blue/green roofs incorporated into the extensive urban greening with high biodiversity, which also reduces the urban heat island effect. The development is also one of the first to include a specific 'Cool Routes' strategy explaining how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate and passes through the site. The scheme is thereby compliant 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

1075. London Plan Policy D11 ('Safey, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to risk- deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

1076. Local Plan policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism. Local Plan policy DM3.2 (Security measures in the new developments and around existing buildings) seeks to ensure that new development in connection with the City of London Police. Policy DM3.3 (Crowded Places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

1077. Strategic policy S2 of the emerging City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by ensuring that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.

1078. The City of London Police have been consulted on this planning application and have provided a number of comments and advice to the applicant. This includes ensuring adequate access controls for different parts of the building, sufficient natural and formal surveillance and in respect of Hostile Vehicle Mitigation.

1079. The main entrance doors would be freely accessible during opening hours, and these would be locked during out of hour periods and monitored through an access control system. The office entrance doors would provide the capability to separate the offices from the public functions. The entrance to the cycle store would be accessible via access control or video intercom, with the secure line from the entrance gate to main storage level being designed to using anti-tailgating speed lanes.

1080. The external stairs, walkway and lift which are publicly accessible would have video surveillance in addition to onsite security. Secure lines within the building would provide the capability to restrict access to authorised building occupants, with turnstiles provided within the ground floor, and levels 1 and 2 to separate public access from tenant circulation. Within the basement levels, access would be restricted between front and back of house areas through the use of a control system.

1081. Hostile Vehicle Mitigation (HVM) is currently proposed around the entrance to the loading bay. The City of London Police have advised that a HVM review for the whole site is required including a Counter Terrorism Risk Assessment and Vehicle Dynamics Assessment. HVM would be required to be integrated within the design and not be a line of bollards particularly on the southern and western elevations. Full details of the HVM and associated assessments would be secured by condition.

1082. The building would have the ability to 'lock down' using physical measures in the event of an external threat, ensuring people do not enter dangerous areas and preventing any threats from entering the building.

1083. The applicant has confirmed they will engage with the Police during the next phase of the project, to ensure their comments and recommendations are taken into account.

1084. The full details of the security measures would be secured by condition and within various management plans within the S106 agreement, which would be assessed in consultation with the City of London Police. Subject to the imposition of conditions and S106 obligations, is considered to be in accordance with London Plan policy D11, Local Plan policies CS3, DM3.2, DM3.3 and DM3.5 and emerging City Plan 2040 policy S2.

Suicide Prevention

1085. Local Plan Policy CS3 requires that security and safety measures are of an appropriate high-quality design. Draft City Plan Policy DE5 requires security and safety to be considered.

1086. 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.

1087. Policy DE4 'Terraces and Elevated Public Space' of the emerging Local Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling.

1088. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrence capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1089. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building regulation K2 states the following:

- A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
- B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1090. 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.

1091. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advised a barrier height of at least 2.5m high, no toe or foot holes, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety.

1092. Developers must, as a minimum, comply with building regulations standards, and where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can used as a step by vulnerable individual.

1093. The proposed development contains two large communal terraces on floors 27 and 28, smaller tenant managed corner terraces on floors 6 to 42 (all of similar designs), and a publicly accessible balcony at the 3rd floor facing on London Wall. Access to the larger communal terraces on floors 27 and 28 will be operated and managed by the building landlord. Access to the smaller terraces at floors will be operated and managed by the tenants occupying those floors. Only the lower 3rd floor balcony will be accessible to members of the public.

1094. The application has been reviewed by officer in conjunction with the city's advisor on suicide prevention matters. For the smaller tenant operated terraces and the publicly accessible 3rd floor balcony, a physical barrier of 1.6m height will be installed at the edges. As the larger communal terraces have increased risk due to the higher capacity, the design of the barrier will be 2.1m high at the edges. The height proposed for the glazed balustrades exceeds the minimum height set out in Approved Document K. The detailed design of these balustrades will be secured by condition.

1095. Terraces shall also be equipped with video surveillance for the building operators to detect whether an attempt to bypass security and safety measures is occurring and increase the opportunity and capacity for human intervention. Furniture on the terraces must be fixed to prevent it being used as a footstool. These matters will be secured by condition as part of a risk assessment.

1096. Thus, it is considered that the proposed development is acceptable in terms of suicide prevention subject to conditions to secure further details of the

proposed balustrades and a risk assessment. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040.

Health Impact Assessment

1097. Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy Impact Assessment (HIA) to assess potential health impacts resulting from proposed developments.

1098. 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".

1099. The application is accompanied by a Health Impact Assessment (HIA) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effect.

1100. The HIA has been based on the London Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on wider determinants of health. The HIA concludes that the development overall has a beneficial impact on health and wellbeing for people on-Site and in the surrounding area. Beneficial effects include: Understanding and addressing a diversity of community needs; Facilitating active travel and healthy lifestyles; Safeguarding environmental and human health by prioritising sustainable, comfortable and attractive design throughout the Site Mitigating against anti-social and criminal behaviour, as well as promoting mental wellbeing and social cohesion through an improved sense of community and the provision of an enhanced public realm; providing training and employment opportunities, although the specifics of how benefits will be targeted for local people in particular will be determined following planning consent.

1101. The HIA proposes recommendations with the aim of ensuring the potential benefits of the proposed development are maximised, for example by continuing to engage with operational phase users and the local community to ensure changing needs are met and committing to local procurement, training and employment agreements.

1102. Potential impacts identified would be mitigated as so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.

1103. 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 emerging City Plan Policy HL9.

Fire Statement

1104. A Fire Statement has been submitted outlining the fire safety strategy for the building which has been reviewed by the City District Surveyor's office. The statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. Thus, the Fire Statement is considered acceptable for the planning stage and is secured by condition.

Planning Obligations and Community Infrastructure Levy

1105. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in the payment of Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1106. These contributions would be in accordance with the Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1107. On the 1st April 2019 the Mayoral CIL2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations 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).

1108. CIL contributions and City of London planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	***Contribution (excluding indexation)***	***Forwarded to the Mayor***	***City's charge for administration and monitoring***

MCIL2 payable	*£14,247,724.39*	*£13,677,815.42*	*£569,908.98*

City CIL

Liability in accordance with the City of London's policies	***Contribution (excluding indexation)***	***Available for allocation***	***Retained for administration and monitoring***
City CIL	*£6,213,907.50*	*£5,903,212.13*	*£310,695.38*

City Planning Obligations

City Planning Obligations	***Contribution (excluding indexation)***	***Available for allocation***	***Retained for administration and monitoring***	***Payment terms***
Affordable Housing	*£4,142,605.00*	*£4,101,178.95*	*£41,426.05*	*Upon implementation of the development*
Local, Training, Skills and Job Brokerage	*£2,485,563.00*	*£2,460,707.37*	*£24,855.63*	*Upon implementation of the development*
Carbon Offset Contribution (as designed) Not indexed	*£1,055,644.00*	*£1,055,644.00*	*£0*	*Upon completion of the development*
Section 278 (Evaluation and Design Fee) Not indexed	*£125,000.00*	*£125,000.00*	*£0*	*Upon commencement of the development*
Security Measures Contribution (Eastern City Cluster)	*£828,521.00*	*£820,235.79*	*£8,285.21*	*Upon implementation of the development*
S106 Monitoring Charge	*£8,000.00*	*£0*	*£8,000.00*	*Upon commencement of the development*
Total liability in accordance with the City of London's policies, excluding indexation	***£8,645,333.00***	***£8,437,766.11***	***£82,566.89***	

1109. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Local Procurement Strategy for Demolition and Construction
  - Submission no later than eight weeks prior to first preparatory operations

- Local Training, Skills and Job Brokerage Strategies for Demolition and Construction
  - Submission of Local Training, Skills and Job Brokerage Strategy for demolition no later than eight weeks prior to first preparatory operations
  - Submission of Local Training, Skills and Job Brokerage Strategy for construction no later than eight weeks prior to commencement

- Delivery and Servicing Management Plan (including Consolidation), to include the following provisions:
  - No servicing outside of the hours of 20:00 and 23:00 on any given day for refuse, recycling and glass collections
  - No other servicing outside the hours of 23:00 and 07:00 on any given day, to be exclusively undertaken from the on-site loading bay
  - No more than 64 two-way trips per day using goods vehicles, including site management vehicles with mode split as: 2 motorcycle/scooter; 20 car; 30 LGV and 12 heavy goods vehicles (3 axle)
  - Details of booking system for all goods vehicles and site management vehicles servicing the site, including refuse and recycling
  - No vehicles greater than 8 metres in length servicing the site, including in instances of fit-out post completion unless otherwise agreed with the City of London in writing
  - Submission no later than six months prior to completion

- Provision of two Accessible Car Parking Spaces, provided on the following terms:
  - Submission of Accessible Car Parking Space Management Plan no later than six months prior to completion
  - Availability of two Accessible Car Parking Spaces between the hours of 07:00 and 19:00 Monday to Sunday as a minimum, with provision to extend to 23:00 where

necessary, for employees and other users of the building, including visitors
    - Responsibility for allocation of the car parking spaces, enforcement of parking contraventions and criteria for decision-making in cases of overdemand for the accessible parking spaces
    - Free of charge use of the two accessible car parking spaces for the lifetime of the development for all users
    - Submission no later than six months prior to completion
    - Provision of the Accessible Car Parking Space for the lifetime of the development

- Travel Plan (including Cycling Promotion Plan)
    - Submission no later than six months prior to completion, including provision for disabled people to enter and exit the site and guidance to promote responsible cycling.

- Construction Monitoring Contribution
    - £53,820.00 due upon commencement covering the first year of the development
    - £46,460.00 due upon the anniversary of the commencement for each subsequent year up to completion of the development

- Legible London Contribution (£24,000.00 Indexed), to be paid upon implementation of the development

- City of London Cycle Infrastructure Improvement Contribution (£32,000.00 Indexed) to be paid upon implementation of the development

- TfL A10 Contribution (£100,000.00 Indexed)

- TfL Cycle Membership Contribution (£90,000.00 Indexed)

- Carbon Offsetting Document Submissions

- 'Be Seen' Energy Performance Monitoring

- Utility Connection Requirements

- Provision of Changing Places toilet at basement level and External Accessible Toilet at street level with Management Plan to include the following provisions
    - Free of charge access for users

- Cleansing arrangements by the owner
- Security arrangements by the owner
- Operational hours between 06:00 and 22:00 for the External Accessible Toilet and the Changing Places Toilet.
- To be submitted no later than six months prior to completion

- Section 278 and section 38 Agreement (City of London), to include but not limited to the following scope of works:

  - Outwich Street and Houndsditch
    - Reconstruction of the footways adjacent to the planning application
    - Resurfacing of the carriageways adjacent to the planning application
    - Renewing of road markings and associated traffic orders
    - Improvements to the existing pedestrian crossing to suit the new site layout
    - Reviewing the existing parking arrangement to suit new site layout and associated traffic orders

  - Camomile Street
    - Reconstruction of the footways adjacent to the planning application
    - Resurfacing of the carriageways adjacent to the planning application
    - Renewing of road markings and associated traffic orders

- Highway Reparation and other Highways Obligations, to include but not limited to:
  - Submission of highways schedule of condition survey no later than eight weeks prior to first preparatory operations
  - Provisions for site access, consents and licences

- London Wall Corridor Improvement Contribution or Highways and Public Realm Improvement Contribution (£1,200,000.00 indexed)

- Provision of the Public Route, including Specification and associated Public Access & Management Plan
  - To be submitted no later than implementation of the development
  - The public routes shall be accessible to the public between 8am and 8pm.

- Provision of Public Realm at Camomile Park and activation of the servicing bay, including Public Access and Management Plan
    - To be submitted no later than implementation of the development

- Provision of Social Enterprise Retail Space and associated management plan to be submitted no later than six months prior to completion, to include but not limited to the following terms:
    - The provision of a minimum of 30sqm (gross internal area) floorspace to form the Social Enterprise Retail Space at ground floor
    - The provision of a minimum of 120sqm (gross internal area) floorspace to form the Social Enterprise Retail Space on either the first or third floor
    - Provision of the Social Enterprise Retail Space no later than upon occupation
    - Submission of the Social Enterprise Retail Space Management Plan six months prior to completion for the approval of the City of London Corporation
    - A fair and reasonable service charge for the Social Enterprise Retail Space Operator, to be agreed with the Social Enterprise Retail Space Operator and secured in the associated management plan
    - A peppercorn rent for the Social Enterprise Retail Space Operator
    - All necessary and reasonable costs relating to the full fit-out of the Social Enterprise Retail Space covered by the owner
    - Provision of the Social Enterprise Retail Space for the lifetime of the development, unless otherwise agreed via a deed of variation with the City of London Corporation
    - To submit a review of the Social Enterprise Retail Management Plan each year for the first five years of operation including statistics regarding use, and upon request by the City of London Corporation for each year thereafter

- Provision of Multifunctional Cultural Space and associated cultural and visitor management plans to be submitted no later than six months prior to completion, to be provided on the following terms:
    - Provision of a minimum of 268sqm (gross internal area) of floorspace at ground floor level to form the Multifunctional Cultural Space no later than upon occupation
    - Provision of a minimum of 193sqm (gross internal area) of floorspace at first floor level to form the Multifunctional Cultural Space no later than upon occupation

- Provision of a minimum of 189sqm (gross internal area) of floorspace at level two to form the Multifunctional Cultural Space no later than upon occupation
- Submission of the Multifunctional Cultural Space Management Plan six months prior to completion for the approval of the City of London Corporation, including details of the charitable operator focused on the performing arts and any other perspective charitable or social users of the space.
- A fair and reasonable service charge for the Multifunctional Cultural Space Charitable Operator, to be agreed with the Multifunctional Cultural Space Operator and secured in the associated management plan
- A peppercorn rent for the Multifunctional Cultural Space Charitable Operator
- All necessary and reasonable costs related to the full fit-out covered by the owner
- Provision of the Multifunctional Cultural Space for the lifetime of the development, unless otherwise agreed via a deed of variation with the City of London Corporation
- Provision of discounted tickets for performance space events public groups, which may include but not be limited to charitable organisations, study groups and schools.
- No more than two private events per month to take place in any part of the multifunctional cultural space to be agreed in writing with the City of London Corporation, not to exceed 10 hours in length and not to take place over more than two calendar days, with all other events to be run by the Multifunctional Space Charitable Operator or charity or community group as agreed by the City of London Corporation, with all private events to be advertised in advance.
- To submit a Multifunctional Space Management Plan, to be reviewed each year for the first five years of operation including statistics regarding use and case studies, and upon request by the City of London Corporation for each year thereafter

- Provision of accessible public lift and associated management plan to be submitted no later than six months prior to completion

- Provision of Churchyard of St Augustine Papey Space and Roman Wall Viewing Platform, to include but not limited to the following terms:
  - Provision of the space 24 hours a 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
    - Provision of Churchyard of St Augustine Papey Space management plan including details of complimentary installations such as plaques, signage and artworks

- Television Interference Survey
    - First Television Interference Survey to be carried out no later than three months prior to commencement
    - Second Television Interference Survey to be carried out no later than three months post completion of the development

- Wind Audit (if requested within five years past completion of the development)

- Solar Glare Assessment (if requested within five years past completion of the development)

- Provision and funding of a PhD placement in partnership with an appropriate Arts and Humanities Research Council or other partner

1110. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

Monitoring and Administrative Costs

1111. 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.

1112. The applicant will pay the City of London's legal costs and the City Planning Obligations 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)

1113. The City, as a public authority, must in exercise of its function, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1114. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against some because of their marriage or civil partnership status. It is the view of officers that a decision to grant planning permission in this case would reduce barriers to access for disabled people through the provision of an enhanced step free public realm and two blue blude badge parking bays on at ground floor level. Officers consider that the provision of Social Enterprise retail space and the provision of a publicly accessible multifunctional cultural space would advance equality of opportunity.

Human Rights Act 1998

1115. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention Right (being rights set out in the European Convention on Human Rights ("ECHR")).

1116. Insofar at the grant of planning permission will result in the interference to private and family life (Article 8 of the ECHR) including by causing harm to amenity of those living nearby in residential properties, it is the view of officers that such interference is necessary in order to secure benefits of the scheme and therefore necessary in the interest of the economic wellbeing of the country, and proportionate. It is considered that the proposals would result in some impact on neighbouring residential properties, albeit not to such an extent as to result in an unacceptable impact on the existing use of nearby residential properties, by reason of loss of light or privacy. As such the extent of the harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan policy DM10.7, London Plan policy D6, or policy DE8 of the emerging City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs adverse impacts on nearby residential properties and that such impact is necessary in the interest of the economic wellbeing of the country and is proportionate.

1117. Insofar as the grant of planning permission would result in the interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of offices that such interference is in the public interest and proportionate.

Conclusion and Overall Planning Balance

1118. 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 emerging City Plan 2040 and considering all other material considerations.

1119. The proposed development comprises of the demolition of the existing buildings on site and their replacement with an office-led tower incorporating high-quality flexible public realm at ground floor level, and on the publicly accessible walkways on levels 1 to 3, related cultural and retail spaces at ground, first, second and third floor levels. The proposal would deliver a high quality, office-led development in City Cluster, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses, and maintaining the City's position as the world's leading international finance business centre.

1120. Objections and observations have been received from Statutory consultees including Historic England- GLAAS, Historic England, The Council for British Archaeology, Historic Royal Palaces, The City of London Archaeological Trust and third parties including on behalf of The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London. Across the two rounds of consultations, a total of two objections were received. The grounds of objection included the size and design of the development, its impact on designated and non-designated heritage assets, the loss of the burial ground and remains and the impact on the environment and amenity of the surrounding buildings. This report has considered the concerns raised and where there is clear disagreement, clear reasoning has been provided in this report. Further to this, any requisite mitigation would be secured by conditions or S106 obligations.

1121. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver nearly 4.23% of the required commercial space to meet projected economic and employment growth demand until 2040. This would be a highly strategic quantity of growth for one scheme to deliver. The scheme would provide 85,624sqm (GIA) of office floorspace (Use Class E(g), which would be flexible, sustainable Grade A commercial office floor space suitable for circa 4,500 FTE City workers. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers, including SMEs.

1122. The proposals are classed as a tall building under adopted and emerging policy, and the site is not located in an area identified as inappropriate for a tall building in the City's Local Plan. Officers have thoroughly assessed the proposals and as a matter of planning judgement, it is considered the proposal

would accord with CS7 and CS14 of the Local Plan, policy S12 and S21 of emerging City plan 2040 and London Plan policy D9 (A, B, C, D).

1123. The proposals would optimise the use of land, delivering high quality office space, a multi-layered series of publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals 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 GG1-6.

1124. The proposed development would be a sophisticated interplay of expressive, playful design and functionality, combining office, public, and cultural spaces within a visually compelling and contextually responsive form. The design throughout seamlessly integrates public amenities and generous urban greening, with the towers' edges defined by tree canopies, and at its lower levels, the multi-levelled Camomile Park, which would host the reimaged Churchyard and revealed Roman wall. Collectively, these elements 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, D4, D9, and City Plan policies CS10 and DM 10.1, 10.3,10.8 and emerging City Plan 2040 policies S8, DE2, DE3, DE4 (1 and 2), DE8 relevant sections of the NPPF and National Design Guide.

1125. The proposed development would represent a highly accessible and inclusive building, with full details being secured by condition and S106 obligation. The proposed development would comply with policy D5 of the London Plan, policy DM10.8 of the Local Plan and policy HL1 of the emerging City Plan 2040.

1126. The proposal would not harm the attributes or components of the Outstanding Universal Value or authenticity and integrity of the Tower of London World Heritage Site, in accordance with the relevant parts of the Local Plan policy CS12, CS13(3), Emerging City Plan 2040 policy S11, HE1, HE3, London Plan policy HC2, HC3, associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

1127. The scheme would comply with London Plan Policy HC4, Local Plan policy CS13, and emerging City Plan policy S13 and associated guidance in the LVMF SPG and Protected Views SPD and neighbouring local view policies and guidance.

1128. The proposals would enhance the significance of the Churchyard of St Augustine Papey (NDHA) and significance of the London Wall Scheduled Ancient Monument, and result in no harm to the significance of any Listed

building, Conservation Area or scheduled Monument and would thereby comply with heritage policies HC1 of the London Plan, Local Plan policies CS12, DM12.1 DM12.4 and emerging City plan 2040 S11, HE1, in addition to relevant sections of the NPPF and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1129. There is high potential for the survival of medieval and later burials within the former churchyard and archaeological remains from periods before this; proposals would remove all archaeological deposits on the site if these survive so could have an impact on these. This impact is considered to be appropriately and effectively managed through the use of conditions attached to this permission, with a PhD studentship proposed alongside the usual measures to oversee and manage the recording, excavation and subsequent study of the burials if these are present, a particularly noteworthy and rigorous arrangement to maximise the potential for this site to advance archaeological knowledge in various ways. Subject to the conditions and S106 obligations, the proposal would comply with policies DM12.4 of the Local Plan, policy HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

1130. Working with a Cultural Partner and Social Enterprise Partner on the lower levels of the building, combined with the creation of Camomile Park, the elevated walkways and retail units, the development would support the aspirations of Destination City to increase footfall and become a 7-day week inclusive destination. The development would create a new pleasant place in the City to linger, enjoy and experience, rather than just pass through.

1131. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight and sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. Some existing residential dwellings will be adversely affected by changes in daylight and sunlight. However, considering the BRE Guidance, the location of the application site and impacted residential properties within the Cluster, the dense urban environment of the City particularly the Cluster, and any reasonable increase in massing, proposed in order to meet the aims of the development plan and the priorities of the CAZ on the delivery of floorspace, the impact of the above mentioned residential properties are considered acceptable in this instance and not considered to result in unacceptable impacts when considered in context. Further to this, in the proposed development in the cumulative scenario only, one amenity space (Devonshire Square A) would not comply with BRE guidance as there would be an 100% loss in terms of the area of this space receiving at least two hours of direct sunlight, the impact on this space is acknowledged and officers consider the benefits of the proposal outweigh the harm caused to this space.

1132. In transportation terms, the proposals would align with aspiration set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The proposal would provide a betterment of local public realm and the highway (though S278

Agreement and contribution to the London Wall Corridor Study and works to the south of the building), and with these improvements the additional pedestrian trips on the transport network can be accommodated. Demolition and construction methodologies would be secured by condition and proposals agreed between the Highways Authority and the appointer contractor, in accordance with construction regulations and logistic guidance. The proposed development would take delivery servicing off the street as it would provide an on-site delivery and servicing area, with all vehicles being to access and egress in forward gear, and with sufficient consolidation secured through a delivery and servicing management plan.

1133. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. Whilst the proposed development would incorporate a large basement (accommodating plant, cycle parking and end of trip facilities), which has an high embodied carbon impact, it is considered that this is required to unlock the greatest number of benefits that would contribute to the wider sustainability and future proofing of the City, this includes optimising the delivery of highest quality office floorspace whilst integrating greening, community and retail uses across multiple levels, benefits which could not be delivered through retrofit where extension and opening up potential was significantly limited, as demonstrated in the pre-development analysis. The building would be designed to high sustainability standards including an increase in local greening and ecological value, operational energy efficiency (including a leading reduction in cooling demand), targeting BREEAM 'Outstanding' and NABERS UK rating of 5 stars and adopting Circular Economy Principles. The Proposed Development is also one of the first to include a specific 'Cool Routes' strategy detailing how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate.

1134. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Eastern Cluster and public realm would be complied with, and polices relating to design, heritage, tall buildings and strategic views of the Local Plan would be complied with. Whilst there would be conflict polices S8 (17), S12(h) and DE4(3) of the emerging City Plan 2040 due to the lack of an elevated public space and policy DE7 of the emerging City Plan as the impact of the proposed development on the nearby hotel have not been assessed, the proposals comply with the development plans when considered as a whole.

1135. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.

1136. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

1137. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with as well as policies relating to office floor space delivery, environmental impacts, provision of a cultural offer and public realm delivery would be complied with, and as the relevant design policies, and the criteria in London Plan policy D9C and D are satisfied, the proposals comply with the development plan when considered as a whole.

1138. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicated otherwise.

1139. The duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. In this case officers are of the view that the settings and significance of listed buildings will be preserved and therefore the section 66(1) objective is achieved.

1140. Among the other material considerations to consider is the NPPF. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means the planning system has three overarching objectives. The proposal contributes to those objectives in the following main ways:

- The provision of 85,624sqm (GIA) of Grade A office floorspace, which would provide an uplift of 67,731.7sqm (GIA) on the site, which would contribute 4.23% toward the City's projected additional minimum requirement of 1.6million sqm GIA. This is a notable contribution by a single development to the City's strategic economic objective. The development is projected to support 4,500 employees daily on-site, and increased spending in the locality boosting local businesses and a post-covid resurgence.
- The introduction of retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active frontages at ground floor level.
- The provision of dedicated space for a food and beverage Social Enterprise provider within the ground floor level and on either level 1 or 3. At ground floor a public facing food offer would be provided with either

further public facing offer on or space for non-public training and development activities on level 1 or 3 (the offer on level 1 or 3 would be dependent on how the Social Enterprise provider operates). This would provide a unique offer through employment, training outreach, providing pathways into employment and training for underrepresented groups.

- The provision of a multi-function cultural space, offering raked seating and supported by foyer, rehearsal and back of house facility space, would offer social, educational and well-being benefits. The proposals would provide a space which can accommodate cultural events to bring a new dynamic to the City and facilitate a 7 day a week Destination City and details of this will be included within a management plan secured within the S106 agreement.
- The overall quality of the development and proposals would attract visitors, increase tourism, support and improved work productivity and enhance the image of the area.
- The scheme would deliver growth in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- At local ground floor level, the proposal would result in significant enhancement of the public realm through the setting back of the building on three elevations and the creation of Camomile Park to the south, public routes through the building, as well as the raised walkways, introducing an attractive open space and creating permeable routes through the building. Camomile Park would include the retention and re-landscaping of the former churchyard of St Augustine Papey and revealing the remains of the Roman Wall of the public, re-establishing the visual connection between the two to the enhancement of both. These spaces would support active and cultural uses which will enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new views and heritage appreciation all of which align with Destination City aspirations.
- The improvements to the public realm for pedestrians and cyclists, including pavement widening and streetscape enhancements, would encourage active travel and support the wellbeing of users, constituting a key social and environmental benefit in a highly congested area, subject to the detail being confirmed through a S278 agreement and S106 financial contributions for the enhancement of streets and spaces. It is the view of officers that satisfactory details can be secured through such agreements.
- The proposal would incorporate a significant uplift in greening and biodiversity benefits across the ground floor level, walkways, balconies and terraces, connecting to and supporting the City's proposed East-West Cool Route.
- The proposal would secure a S106 obligation of £4,101,178.95 (excluding monitoring and indexation) towards affordable housing provision and £2,460,707.37 (excluding monitoring and indexation) towards local training, skills and job brokerage.

- A PhD placement, in partnership with MOLA and/or another Arts and Humanities Research Council (AHRC) body, would be funded by the applicant to participate in the aforementioned work of recording and carry out the excavation analysis, recording, publication and archiving. This would go beyond the usual archaeological requirements and would represent an enhancement of the usual archaeological processes required post-permission.

1141. Paragraph 10 of the NPPF sets out there is a presumption in favour of sustainable development. For decision taking that means approving developments that accord with an up-to-date development plan without delay.

1142. Paragraph 85 of the NPPF states that significant weight is to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The contribution that the scheme will make to supporting economic growth is a factor which weighs in its favour.

1143. The scheme would also provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. The payment of CIL is a local finance consideration that weighs in favour of the scheme.

1144. It is the view of officers that 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

Application Documents

- Completed Application Form, prepared by DP9
- CIL Form, prepared by DP9
- Cover Letter, prepared by DP9, dated 6 February 2025
- Exisitng Location Plan – 1864-FPA-XX-XX-DR-A-16050, prepared by Fletcher Priest Architects
- Existing Drawings, prepared by Fletcher Priest Architects
- Environmental Statement, prepared by Trium dated December 2024 (as amended), including:
    - Volume 1: ES Main Report
    - Volume 2: Built Heritage, Townscape and Visual Assessment
    - Volume 3: Technical Appendices
    - Non-Technical Summary
- Aviation Safeguarding Assessment Issue 2, prepared by K L Grant Consulting, dated 31 January 2025
- Biodiversity Net Gain Report Issue D, prepared by Assystem Energy and Infrastructure, dated 05 February 2025
- Equality Statement, prepared by Trium dated January 2025
- Fire Statement Rev 01, prepared by Arup dated 31 January 2025
- Health Impact Assessment, prepared by Trium dated January 2025
- Operational Waste Management Strategy Version 01, prepared by Velocity dated January 2025
- Outdoor Thermal Comfort Assessment, prepared by RWDI dated 31 January 2025
- Tower of London Heritage Impact Assessment, prepared by The Townscape Consultancy dated May 2025
- Outline Delivery and Servicing Plan, prepared by Velocity dated January 2025
- Outline Demolition & Construction Environmental Management Plan, prepared by TCCL dated January 2025
- Archaeological Desk Based Assessment, prepared by MOLA dated January 2025
- Circular Economy Statement version 02, prepared by CBRE dated May 2025
- Cool Routes Report Rev 01, prepared by Fletcher Priest Architects dated January 2025
- Culture & Social Value Strategy, prepared by Things Made Public dated January 2025
- Energy Assessment Rev 02, prepared by Hilson Moran dated January 2025
- Flood Risk Assessment, prepared by AKT II dated January 2025
- Preliminary Investigation Report- Land Contamination Rev 01, prepared by Soiltechnics dated January 2025
- Stage 2 Drainage Strategy Report, prepared by AKT II dated January 2025
- Pedestrian Level Wind Microclimate Assessment, prepared by RWDI dated January 2025

- Preliminary Ecological Appraisal Rev D, prepared by Assystem dated January 2025
- Statement of Community Involvement, prepared by Kanda dated January 2025
- Sustainability Statement, prepared by CBRE dated January 2025
- Utilities Assessment Issue 02, prepared by Hilson Moran dated January 2025
- Ventilation/ Extraction Statement Issue 02, prepared by Hilson Moran dated January 2025
- Whole Life Carbon Assessment, prepared by CBRE dated May 2025
- Wind Analysis Response prepared by RWDI dated May 2025
- Pedestrian Comfort Level Assessment Technical Note prepared by Velocity dated May 2025
- Adaption to Climate Change prepared by CBRE dated September 12th 2024
- Annex 8.6 Overshadowing Assessment prepared by GIA dated May 2025
- Annex 8.8 Light Pollution Assessment prepared by GIA dated May 2025
- Appendix 8.3 Drawings prepared by GIA dated May 2025
- Heating & Cooling Systems Note
- Pre-Redevelopment and Pre-Demolition Audit prepared by Velocity dated May 2025
- Schedule of Responses to GLA Comments Received dated 23 May 2025
- Public Transport Impact Assessment Note prepared by Velocity dated May 2025
- Drawing Issue Sheet, prepared by Fletcher Priest Architects
- Clarifications on Cultural Partner and Social Enterprise Partner Commitments prepared by DP9 dated 23 May 2025
- Design and Access Statement Rev 01, prepared by Fletcher Priest Architects dated January 2025
- Planning Statement, prepared by DP9 dated January 2025
- Transport Assessment Version 0.1, prepared by Velocity dated January 2025
- Terraces and Balconies Windiest Season
- Cycle Promotion Plan Rev 0.1, prepared by Velocity dated January 2025
- Daylight and Sunlight results for Bevis Marks Synagogue and Petticoat Square, Middlesex Estate, prepared by GIA
- Video, Kinetic Viewing Experience Across Tower Bridge, prepared by Miller Hare
- Commentary to accompany Video, prepared by The Townscape Consultancy
- Technical Note prepared by AKT II dated June 2025
- Response to Objection prepared by GIA dated June 2025
- Part L 2021 Performance Spreadsheet
- GLA Detailed Application Stage Circular Economy Statement
- Project Details Spreadsheet
- GLA Compliance Comments Spreadsheet
- 63 St Mary Axe, Redacted Cost Plan for RIBA Stage 2 Whole Life Carbon

- 25_00223_FULEIA Circular Economy Statement Spreadsheet dated 29 May 2025
- Circular Economy workshop (Ambitions workshop) June 2025
- Project Sky 2: WELL/BREEAM Workshop Date: 02/09/2024
- GLA Compliance Schedule
- 26 Wormwood Street Visuals (Addendum to Annex 5)
- Air Quality Comments Response by Hilson Moran dated 17 April 2025
- Air Quality Comments Response by Hilson Moran dated 9 May 2025
- Review of daylight and sunlight assessment at 63 St Mary Axe, prepared by BRE
- Sky2 Camomile Court 3rd Party Review of Whole Life Carbon Assessment Report May 2025
- Correspondence from EoN regarding heat network dated 22 May 2025
- Correspondence from City of London Climate Action dated 13 May 2025
- Correspondence from DP9 regarding the loss of gym dated 23 June 2025

Internal Consultations

- Email, Air Quality Officer, 24 March 2025
- Memo, Environmental Health Officer, 28 March 2025
- Memo, LLFA, 01 April 2025
- Email, Cleansing Services, 05 May 2025
- Memo, District Surveyors, 08 May 2025
- Email, Cleansing Services, 12 May 2025
- Letter, The City of London Archaeological Trust, 16 May 2025
- Memo, Air Quality Officer, 03 June 2025

External Consultations

- Acknowledgement Letter, Lambeth, 18 March 2025
- Email (Objection), Roshan Thakkar, 12 March 2025
- Acknowledgement Email, Haringey, 20 March 2025
- Acknowledgement Letter, The Royal Borough of Kensington and Chelsea, 20 March 2025
- Acknowledgement Letter, London Borough of Richmond Upon Thames, 21 March 2025
- Acknowledgement Letter, Tower Hamlets, 21 March 2025
- Acknowledgement Letter, Westminster City Council, 21 March 2025
- Acknowledgement Email, GLA, 21 March 2025
- Letter, Hackney, 24 March 2025
- Email, Active Travel England, 25 March 2025
- Letter, Gatwick Airport, 26 March 2025
- Letter, City Airport, 28 March 2025
- Email, Heathrow Airport, 28 March 2025
- Email, NATS Safeguarding, 28 March 2025
- Email, Haringey, 31 March 2025

- Letter, The Royal Borough of Kensington and Chelsea, 02 April 2025
- Acknowledgement Letter, Hammersmith and Fulham, 04 April 2025
- Acknowledgement Letter, Islington, 04 April 2025
- Letter, Southwark, 07 April 2025
- Letter, Historic England GLAAS, 08 April 2025
- Letter, Royal Borough of Greenwich, 03 April 2025
- Letter, Lambeth, 11 April 2025
- Letter, Environment Agency, 15 April 2025
- Email, Council for British Archaeology, 16 April 2025
- Letter, Historic Royal Palaces, 22 April 2025
- Letter, Historic England, 16 April 2025
- Letter, Natural England, 22 April 2025
- Letter, London Borough of Richmond Upon Thames, 23 April 2025
- Email, Surveyor to the Fabric of St Paul's, 02 May 2025
- Report, GLA Stage 1 Response, 06 May 2025
- Email, Heathrow Airport, 09 May 2025
- Letter, Network Rail, 09 May 2025
- Email, Active Travel England, 09 May 2025
- Letter, London City Airport, 12 May 2025
- Email, NATS Safeguarding, 13 May 2025
- Letter, The Royal Borough of Greenwich, 15 May 2025
- Email, Historic England GLAAS, 16 May 2025
- Letter, London Borough of Tower Hamlets, 16 May 2025
- Letter, London Borough of Tower Hamlets, 16 May 2025
- Letter, London Borough of Hammersmith and Fulham, 19 May 2025
- Letter, Environment Agency, 21 May 2025
- Email, Transport For London Infrastructure Protection, 22 May 2025
- Email, Natural England, 27 May 2025
- Email, Historic England, 30 May 2025
- Letter, Westminster City Council, 29 May 2025
- Letter, Lambeth Council, 04 June 2025
- Letter, London Borough of Hammersmith and Fulham, 06 June 2025
- Email, Surveyor to the Fabric - St Paul's Cathedral, 06 June 2025
- Email, Council for British Archaeology, 10 June 2025
- Email, Thames Water dated 17 June 2025
- Email, Dr Lorna Flores Villa BRE dated 19 June 2025
- Email, GLA dated 19 June 2025
- Email, Thames Water dated 20 June 2025

Representations

- Objection, Roshan Thakkar, 12 March 2025
- Objection, Daniella Wax, 16 April 2025
- Objection, Eversheds Sutherland (International) LLP on behalf of The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London, 5th June 2025

Appendix A

REAONSED CONCLUSIONS ON SIGNIFCIANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in this 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 that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan and a Travel Plan. Mitigation measures should be secured including wind mitigation. 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 agreement. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy 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)

Emerging City Plan 2040

- Draft Strategic Policy S1: Health and Inclusive City
- Draft Policy HL1: Inclusive buildings and spaces
- Draft Policy HL2: Air quality
- Draft Policy HL3: Noise
- Draft Policy HL4 Contaminated land and water quality
- Draft Policy HL5: Location and protection of social and community facilities
- Draft Policy HL6: Public Toilets
- Draft Policy HL7 Sport and Recreation
- Draft Policy HL8 Play areas and facilities
- Draft Policy HL9: Health Impact Assessment (HIA)
- Draft Strategic Policy S2: Safe and Secure City
- Draft Policy SA1: Publicly accessible locations
- Draft Policy SA2 Dispersal Routes
- Draft Policy SA3: Designing in Security
- Draft Strategic Policy S3: Housing
- Draft Policy HS3: Residential Environment
- Draft Strategic Policy S4: Offices
- Draft Policy OF1: Office Development
- Draft Policy OF2: Protection of Existing Office Floorspace
- Draft Policy OF3 Temporary 'Meanwhile' Uses
- Draft Strategic Policy S5 Retail and Active Frontages

- Draft Policy RE2 Active Frontages
- Draft Policy RE3 Specialist Retail Uses and Clusters
- Draft Strategic Policy S6: Culture and Visitors
- Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Draft Policy CV3: Provision of Visitor Facilities
- Draft Policy CV5 Evening and Night-Time Economy
- Draft Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Draft Policy N1 Infrastructure Provision and Connection
- Draft Policy IN1: Infrastructure Capacity
- Draft Strategic Policy S8: Design
- Draft Policy DE1: Sustainable Design
- Draft Policy DE2: Design Quality
- Draft Policy DE3: Public Realm
- Draft Policy DE4: Terraces and Elevated Public Spaces
- Draft Policy DE5 Shopfronts
- Draft Policy DE6 Advertisements
- Draft Policy DE7: Daylight and Sunlight
- Draft Policy DE8: Lighting
- Draft Strategic Policy S9: Transport and Servicing
- Draft Policy VT1: The impacts of development on transport
- Draft Policy VT2 Freight and Servicing
- Draft Policy VT3: Vehicle Parking
- Draft Policy VT5: Aviation Landing Facilities
- Draft Strategic Policy S10: Active Travel and Healthy Streets
- Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Draft Policy AT2: Active Travel including Cycling
- Draft Policy AT3: Cycle Parking
- Draft Strategic Policy S11: Historic Environment
- Draft Policy HE1: Managing Change to Historic Environment Development
- Draft Policy HE2: Ancient Monuments and Archaeology
- Draft Policy HE3: Setting of the Tower of London World Heritage Site
- Draft Strategic Policy S12: Tall Buildings
- Draft Strategic Policy S13: Protected Views
- Draft Strategic Policy S14: Open Spaces and Green Infrastructure
- Draft Policy OS2: City Urban Greening
- Draft Policy OS3: Biodiversity
- Draft Policy OS4: Biodiversity Net Gain
- Draft Policy OS5 Trees
- Draft Strategic Policy S15: Climate Resilience and Flood Risk
- Draft Policy CR1: Overheating and Urban Heat Island Effect
- Draft Policy CR3 Sustainable Drainage Systems (SuDs)
- Draft Policy CR4 Flood Protection and Flood Defences
- Draft Strategic Policy S16: Circular Economy and Waste

- Draft Strategic Policy S26 Planning Contributions
-

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- Barbican and Golden Lane Conservation Area SPD, February 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy October 2024
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

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

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, by:

1. Increasing the provision of sustainable, energy-efficient, attractive, high quality office floorspace in a range of accommodation types, that meet the varied needs of office occupiers and achieve modernisation of office stock.

2. Promoting the Eastern Cluster as a location for inward investment, providing assistance to potential developers, investors and occupiers.

3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views.

4. Ensuring the safety of businesses, workers, residents and visitors, promoting natural surveillance of buildings, open spaces and streets and protecting against crime and terrorism.

5. Enhancing streets, spaces, and the public realm for pedestrians, providing new open and public spaces where feasible, increasing connectivity with surrounding

areas and improving access to facilities and services, particularly in the Cheapside and Aldgate areas and towards the City Fringe.

6. Ensuring the provision of high quality utilities (including CCHP where feasible) and communications infrastructure, encouraging early engagement and joint working between developers and utility providers and maximising the space under the streets, particularly through the use of pipe subways.

7. Delivering improvements to public transport to cope with the demands of the growing numbers of workers and visitors, implementing street and traffic management measures and ensuring that improvements do not compromise the quality of the environment.

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 by: …

CS16 Public transport, streets and walkways

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

CS17 Waste

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

CS18 Flood risk

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

CS19 Open Spaces and Recreation

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

CS20 Retailing

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

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

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

Policy DM 1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and

there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

• prejudicing the primary business function of the City;

• jeopardising the future assembly and delivery of large office development sites;

• removing existing stock for which there is demand in the office market or long term viable need;

• introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.2 Assembly and protection of large office development sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

a. assist developers in identifying large sites where large floorplate buildings may be appropriate;

b. invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;

c. ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;

d. resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;

b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;

c) continued use of existing small and medium sized units which meet occupier needs.

Policy DM 1.4 Temporary alternative use of vacant office buildings and sites

1. To permit the temporary use of vacant office buildings and sites by other uses where such uses would not produce unacceptable amenity conflicts nor prejudice the eventual return of the site to office use.

2. To refuse the temporary replacement of vacant offices with housing where it would adversely affect the existing beneficial mix of commercial uses

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;

b) reasonable gas and water supply considering the need to conserve natural resources;

c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

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:

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

b) measures to be integrated with those of adjacent buildings and the public realm;

c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

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

a) conducting a full risk assessment;

b) keeping access points to the development to a minimum;

c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;

d) ensuring early consultation with the City of London Police on risk mitigation measures;

e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;

b) restricting motor vehicle access, where required;

c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;

d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;

b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

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

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

c) appropriate, high quality and durable materials are used;

d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;

i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;

l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

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

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;

b) adversely affect rooflines or roof profiles;

c) result in the loss of historic or locally distinctive roof forms, features or coverings;

d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

a) the predominant use of the space, surrounding buildings and adjacent spaces;

b) connections between spaces and the provision of pleasant walking routes;

c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;

d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;

e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;

f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;

g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;

i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;

j) the use of high quality street furniture to enhance and delineate the public realm;

k) lighting which should be sensitively co-ordinated with the design of the scheme.

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:

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities

1. To resist the loss of existing visitor, arts and cultural facilities unless:

• replacement facilities are provided on-site or within the vicinity which meet the needs of the City’s communities; or

• they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or

• it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2. Proposals resulting in the loss of visitor, arts and cultural 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 floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.2 Public Art

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

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;

b) ensuring that financial provision is made for the future maintenance of new public art;

c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 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.

Policy DM 12.5 Historic parks and gardens

1. To resist development which would adversely affect gardens of special historic interest included on the Historic England register.

2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;

b) an energy statement in line with London Plan requirements;

c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve

national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated 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 on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish

whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

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

a) road dangers;

b) pedestrian environment and movement;

c) cycling infrastructure provision;

d) public transport;

e) the street network.

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

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable

future demands placed upon it, including at peak periods;

b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

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

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

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

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

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

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

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.

Policy DM 16.7 Aviation landing facilities

No heliports will be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.

DM17.1 Provision for waste

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

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

DM17.2 Designing out construction waste

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

a) reuse of existing structures;

b) building design which minimises wastage and makes use of recycled materials;

c) recycling of deconstruction waste for reuse on site where feasible;

d) transport of waste and construction materials by rail or river wherever practicable;

e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

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:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

b) the benefits of the development outweigh the flood risk to future occupants;

c) 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:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and

b) 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:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;

b) provide a high quality environment;

c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;

d) have regard to biodiversity and the creation of green corridors;

e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

a) green roofs and walls, soft landscaping and trees;

b) features for wildlife, such as nesting boxes and beehives;

c) a planting mix which encourages biodiversity;

d) planting which will be resilient to a range of climate conditions;

e) maintenance of habitats within Sites of Importance for Nature Conservation.

Policy DM19.4 Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient, by:

• protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;

• where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;

• requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or 10 or more affordable units of 2 or more bedrooms;

• promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.

2. Play areas and facilities should not be located where they would cause undue disturbance to neighbouring occupiers.

Policy DM 20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000m2) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

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.

Policy 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.

Policy 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

Methodologies for Assessing Daylight, Sunlight and Overshadowing

Existing Buildings

Daylight to Existing Buildings

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

1. **Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
2. **Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the 492 proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

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

Sunlight to Existing Buildings

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

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

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

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

Interpretating Assessment Data

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which 493 are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

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

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

Open Spaces

Overshadowing

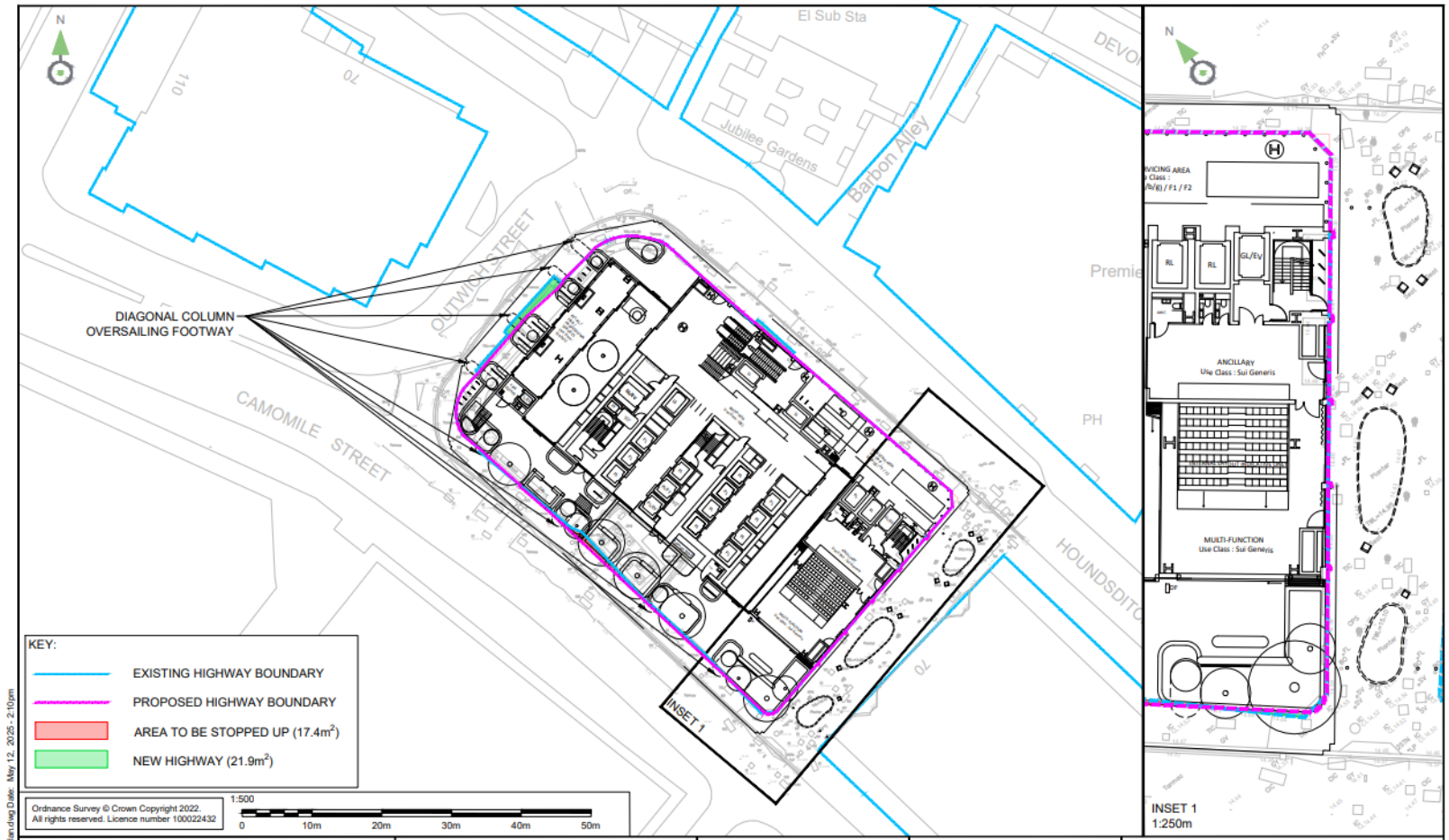
Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the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

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

Assessing the Cumulative Impact of Development Proposals

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

Appendix D – Highways Stopping Up Plan



Rev	Date	Description	Drn	Chk	App
C	12/05/25	AREA TO BE STOPPED UP AMENDED	HMC	JH	TDL
B	25/04/25	AREA TO BE STOPPED UP AMENDED	HMC	JH	TDL
A	24/04/25	FIRST ISSUE	HMC	JH	TDL

Notes:
1. DO NOT SCALE FROM THIS DRAWING.
2. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
3. THIS DRAWING IS TO BE PRINTED IN COLOUR.
4. THE TOPOGRAPHICAL SURVEY INFORMATION HAS BEEN PROVIDED BY CBRE (DRAWING NO 0465641-T-00/03) AND VELOCITY TRANSPORT PLANNING SHALL NOT BE LIABLE FOR ANY INACCURACIES OR DEFICIENCIES.
5. THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES AND MUST NOT BE USED FOR CONSTRUCTION.
6. THE HIGHWAY BOUNDARY SHOWN ON THIS DRAWING IS BASED ON OUR INTERPRETATION OF THE COL MAPPING AND MAY NEED TO BE REFINED AS PART OF THE STOPPING UP PROCESS.

VELOCITY

Drawing Status: S1 - FOR COORDINATION

Client: AXA

Architect: FLETCHER PRIEST ARCHITECTS

Project Title: PROJECT SKY 2

Drawing Title: STOPPING UP PLAN

Scale @ A3	Date	Designed/Drawn	Checked	Approved
1:500	24/04/25	HMC	JH	TDL

Project Ref: 22-166

Drawing Number: 22-166-T-040

Rev: C

Drawing file: 22-166-T-040-Stopping Up Plan.dwg Date: May 12, 2025 - 2:10pm

Schedule

APPLICATION: 25/00223/FULEIA

63 St Mary Axe, London, EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

CONDITIONS

Time Limit for Commencement	
1	**Time Limit** The development hereby permitted shall be begun before the expiration of three years from the date of this permission. Reason: To ensure compliance Section 91 of the Town and Country Planning Act 1990.
Environmental Health	
2	**Plant Noise Levels** (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	**Grease Separator** 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.
4	**Music** No live or recorded music shall be played that it can be heard outside the premises or within any other premises. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
5	**Opening Hours** The hereby permitted retail/food and beverage and multi-function cultural space shall not be open to the public between the hours of 23:00 on one day and 07:00 on the following day. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
6	**Hours of use of the roof terraces, balconies and elevated walkways** The roof terraces, balconies and elevated walkways hereby approved shall not be used or accessed between 23:00 on one day and 07:00 on following day, other than in the case of emergency. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
7	**Music on roof terraces, balconies and elevated walkways**

	No amplified or other music shall be played on the roof terraces, balconies or elevated walkways. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
8	**Promoted Events** There shall be no promoted events on the premises (including the terraces, balconies and elevated walkways). A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
9	**Scheme of Protective Works (Demolition)** There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
10	**Scheme of Protective Works (Construction)** There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set

	out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts
11	**Acoustic Report** Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the offices does not exceed NR40 attributable to the other uses of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter. REASON: To protect the amenities of occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
12	**Fume Extract Arrangements** Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen uses. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the 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.
13	**Plant Vibration** Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

	REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
14	**Ventilation and Extraction including Odour Control Systems Maintenance** All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
15	**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	**Investigation and Risk Assessment** 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	**Remediation Scheme** 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 Detailed Design** 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, pump system, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2.79 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 260 m3 ; (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 Lifetime 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	**Piling Method Statement (Waste Water) – Thames Water** No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface 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.
21	**Piling Method Statement (Clean Water)- Thames Water** No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. 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	**Water Network Upgrades – Thames Water** 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.
	Archaeology
23	**Written Scheme of Investigation** No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology

	of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. Where heritage assets of archaeological interest are identified then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Details of a programme for delivering related positive public benefits to include community outreach and site visits during excavations. C. Production of a programme of extensive scientific analysis of human remains formulated in association with the London Museum. The results of the scientific analysis should be included in part D and should include, but not be limited to, stable isotope analysis, aDNA, Carbon 14 dating, digital x-ray and calculus sampling carried out across a suitable sample of the cemetery population. D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material (including retention of human remains in appropriate storage). This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. E. The results of the archaeological excavation should be used to inform the design of the former Churchyard garden**.** The Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
24	**Archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall**

	No development shall commence until details of an archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall has been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of the development. 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	**City Airport - Permanent Obstacle Lighting Scheme** Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation. Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.
	Sustainability
26	**Circular Economy** Prior to the commencement of the development (excluding demolition) an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance including achieving a minimum 20% recycled content (by value). The Statement shall provide evidence of the steps taken to maximise reuse at highest value of the key demolition products identified in the pre-demolition audit, including the listing of suitable items on an appropriate materials exchange platform. The end-of-life strategy of the statement shall include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft

	Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2; emerging City Plan 2040 policies DE1 and S16.
27	**Post Construction Circular Economy** No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development. 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 and Policy S16 of emerging City Plan 2040.
28	**Whole Life Cycle Carbon Emissions** a) Prior to the commencement of the development (excluding demolition), after 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, demonstrating that the Whole Life-Cycle Carbon emissions of the development achieve at least the GLA's Standard Benchmarks, and setting out further opportunities to reduce emissions towards the GLA's Aspirational Benchmarks (as set out in the GLA's Whole Life-Cycle Assessment Guidance). The WLCA shall provide details of the measures to reduce embodied carbon emissions from substructure and superstructure to achieve the GLA's Standard Benchmark without relying on potential savings from low carbon materials which present a procurement risk. 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. b) If the approved levels of cement replacement, particularly in substructure concrete (70%), or the use of low carbon steel (e.g. EAF, reused or high % recycled content) cannot be achieved - thereby significantly increasing emissions associated with the structure of the development - a detailed justification shall be submitted to the Local Planning Authority. To help mitigate the associated impact of on structural carbon emissions, exemplar initiatives to minimise emissions shall be developed and agreed with

	the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
29	**Post-construction whole-life cycle carbon emissions** Once the as-built design has been completed (upon commencement of RIBA Stage 6), 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. The post-construction assessment shall 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 shall be submitted along with any supporting evidence as per the guidance and shall be received no later than three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
30	**Energy Network Connection** Prior to the commencement of the development, excluding demolition, details of 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.
31	**Climate Change Resilience Sustainability Statement - Pre-commencement** Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, overheating, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. In The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
32	**Climate Change Resilience Sustainability Statement – Post completion** Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. The statement shall include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

	REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
33	**BREEAM** A post construction BREEAM assessment demonstrating that a rating of 'Outstanding' has been achieved for office spaces and a rating of 'Excellent' has been achieved for the retail spaces (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 carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
34	**Updated Biodiversity Net Gain** Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment shall be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS4. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start**.**
35	**Greening and Biodiversity** Prior to the relevant works, a revised, detailed landscaping strategy describing the quality, quantity and maintenance of the proposed urban greening and biodiversity measures shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To ensure the development delivers the highest quality public realm with the highest feasible levels of greening and biodiversity and supports wellbeing, and climate resilience including minimising the urban heat island, and reducing heat stress and flood risk in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG2, G5 and G6, Local Plan policies DM15.5, DM

	18.3 and DM19.2, emerging City Plan 2040 policies DE2, OS2, OS3 and OS4.
36	**Habitat Maintenance and Management Plan** Prior to the commencement of the development, excluding demolition, an Ecological Habitat Maintenance and Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring, including irrigation and rainwater attenuation • detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided • Build-up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.
37	**Post Construction UGF and BNG** Within 6 months of completion details of the measures to meet or exceed the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. 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 Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.
Design/Public Realm Including Lighting	

38	**Architectural details** Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) Particulars and samples of the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy, and inclusive access management plan; b) construction of 1:1 sample material and facade panels of agreed sections of the facades; c) detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including reference to materials, finishes, lighting, details of jointing, and drip details, and any necessary expansion/movement joints; d) Notwithstanding the approved drawings for floors 0-6, 1:20 detailed drawings in plan, section and elevation, in addition to material specification and finishes, including all entrances and door design, soffits, clear glazing, column face pattern and texture and integrated art panels, and information boards; shall be provided. e) Full details of terraces, including all elevations, layouts, entrance design and location, fenestration, planters, seating, lighting, soffits, drainage, irrigation, balustrades and any other infrastructure required, demonstrating adequate microclimatic mitigation has been considered where necessary; f) Details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; g) 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; h) 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; i) details of all new service vehicle, fire escape and cycle store entrances; j) details of all external signage for all aspects of the building; k) details of access to the roof for cleaning and maintenance, including details of mansafe equipment; l) notwithstanding the approved drawings, full details of the rooftop 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.

39	**Landscaping details** Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. details of all soft landscaping, including the position, size and types of plants, specifying their seasonal interest, in addition to details of their respective planting beds and substrate requirements, and their contribution to biodiversity 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. details of all urban furniture, including planters; seating; refuse bins; 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 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
40	**Former Churchyard of St Augustine Papey** 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) Notwithstanding the approved drawings, full details and specification of the design for the former churchyard, its hard and soft landscape detailing, elevations, soffits and design for artwork and historic interpretation, signage and lighting will be provided ; 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, DM12.1 and policies DE2, DE3,DE4, DE6, DE8 and HE1, HE2 of the emerging City Plan 2040
41	**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.
42	**Street Lighting** Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
43	**Benches on Level 3 Elevated Walkways** Prior to the affected works, a plan and associated microclimate testing must be submitted to and approved in writing by the Local Planning Authority, showing that benches on the Level 3 Elevated Walkway are sited in an area suitable for occasional sitting. The benches shall be sited in an area suitable for occasional sitting for the lifetime of the development. REASON: To ensure that the benches are located in acceptable microclimatic conditions and to comply with policy DM10.1 of the Local Plan and polices S8 and DE2 of the emerging City Plan 2040.
44	**Plant and GPDO Telecoms** No plant or telecommunications equipment shall be installed on the exterior of the building (to the roof above the building line), including any

	plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) (England) 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.
	Accessibility and Inclusivity
45	**Signage and Wayfinding** Prior to commencement excluding demolition, a signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural uses, flexible uses and toilets 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
46	**Inclusion and Accessibility** Before any works thereby affected are begun, the following details shall be submitted 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 (including internal principal access routes) to include information at a scale of no less than 1:20 and 1:5 of thresholds, door opening mechanisms, door furniture, framing contrast, access control points, manifestation and matwells. (c) Details of reception facilities as relevant, to include location, non-slip floor materials, a lowered section of the desk with capacity for an under-counter knee recess and demonstrating how backlighting glare is avoided. (d) Details of wider aisle gates at all controlled points of entry. (e) Details of seating in the public realm and on terraces to ensure that options for seating include single, aligned and group facing seating, seating at a range of heights, and with options for backrests and arms for support when rising, and for wheelchair users to transfer to sit alongside companions.

	(f) Details of all accessible toilet provision (all wheelchair and ambulant provision), including layout and options for right and left handed transfer at a scale of no less than 1:20. (g) Details of the auditorium style seating in the Multifunction Space including options for wheelchair users, and people who need arm-supports or back rests. (h) Details and specifications for all lifting devices including doors, widths, control panels, floor surfaces, means of operation and internal car dimensions. (i) Details including a section at drawn scale of no less than 1:5 of thresholds for the external terraces, balconies and walkways. (j) Details of the routes-through between south and west terraces at levels 1 to 3 to ensure that there is sufficient room for a wheelchair or mobility scooter user, or person using crutches, or with an assistance animal to be able to move comfortably between terraces, without conflict with people using stairs. Reason: To ensure the development proposals provide a fully accessible and inclusive facility in accordance with policy DM10.8 and policy D5 of the London Plan.
47	**Publicly Accessible Changing Places and Accessible Toilet** Before any works thereby affected are begun details including layout drawings at a scale of no less than 1:20, surface materials and lighting, shall be submitted and approved in writing by the Local Planning Authority of: (a) Changing Places facilities at basement level one (b) Accessible toilet accessed externally at ground floor level (c) Associated signage The approved facilities shall be available to general public free of charge for the lifetime of the development. The signage informing the general public of toilet facilities on site, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development. Reason: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with policy DM22.2 of the Local Plan.
48	**Inclusive Access Management Plan** Prior to the occupation of the development, and Access Management Plan shall be submitted to and approved in writing by the Local Planning.

	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 or for the lifetime of the development, to ensure that the highest standard of accessibility is provided. This Inclusive Access Management Plan shall include details of: 1. Website content giving prior information to by hosted by the building operator including photos as relevant and an easy read version with information on: (a) Travel distance from the key step-free points of arrival including identification of resting points and distance of intermediate intervals. (b) Setting down points within the vicinity of the development including information on kerb heights and distance to controlled crossing points. (c) A protocol of users of the accessible parking bays for the disabled users of the development. This should include (but not limited to) prior information with photos on: • Dimensions of the bays • Protocol for reserving/booking a space • Details of the onward journey and siting of controlled entry system • Any time limits on occupancy of the space (d) A scenario-based assessment of while journey building use by cyclists using larger or adapted cyclists aligned with the information submitted for servicing and standard cycle bays. (e) Details of the Changing Places facility including information on key access and sling (as relevant). (f) Details of dog spend areas in reasonable proximity of the development including dimensions and type of surface. (g) Details of planting demonstrating how unwelcome touch and scent can be avoided. (h) A preview of the cycle parking (including access) and end of trip facilities (i) Wayfinding Strategy (j) Details of training frequency and issue of Personal Emergency Evacuation Plans. (k) Details of assistive technology within the development (l) Details of Rest and recovery facilities

	(m) Sanitary provision including but not exclusively accessible toilets, ambulant toilets and baby changing facilities. 2. Management practices to deliver the Inclusive Entrance Strategy 3. Management practices to deliver the inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs). Reason: To ensure the development proposals provides and is managed as an accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.
	Highways and Transportation
49	**Cycle Parking and Facilities** Details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details to the following, shall be provided in a drawing (scale of not less than 1:20): (a) layout of long stay and short stay cycle parking (b) Assessment on the numbers of cyclists arriving/departing at peak periods. Show that there is sufficient capacity for cyclists to move and get to/from the cycle parking areas. List security measures, if any, required to open the doors. (c) Provide details on the journey from on-street to the parking spaces, showing full dimensions and gradients, including lift dimensions. This should include details for the accessible routes (including cycle lifts, corridor widths and door automation) on drawings on a scale of no less than 1:20. (d) The provision of cycle parking spaces shall comprise of long stay cycle parking of 1463 spaces and short stay cycle parking of 101 spaces. (e) minimum of 73 spaces, shall accommodate larger/adapted cycles with suitable cycle lifts and other associated facilities. All spaces to be shown on a drawing at a scale of no less than 1:20 with dimensions and gradients. (f) Details of the changing facilities, showers (147 showers) and lockers (1463 lockers) shall be submitted and approved in writing by the Local Planning Authority. These facilities shall be provided prior to occupation and maintained throughout the life of the building for the use of occupiers and visitors of the building in accordance with the approved details. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and available at all times throughout the life of the

	buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.
50	**Restricting numbers of deliveries/ servicing** There shall be no more than 64 trips associated with deliveries/servicing/waste activities in total over any 24-hour period (accounting for a consolidation rate of 50%). Deliveries on foot and cargo bikes are not restricted. REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.
51	**Servicing and Delivery Hours** Refuse, recycling, and glass collections must be carried out between the hours of 8pm and 11pm on any given day only. All other deliveries and servicing (excluding any on-foot and cargo bike deliveries) must take place from the on-site loading bay overnight between 11pm on one day to 7am on the following day. 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.
52	**Servicing** Goods including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the on-site delivery and servicing area. REASON: To avoid obstruction on the surrounding streets and to safeguard the amenity of occupiers of adjacent premises in accordance with polices DM16.1, DM16.5 and DM21.3 of the Local Plan.
53	**Demolition and Construction Management Plan**

	Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include: Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing. • Construction vehicle routes to and from the site to be approved with CoL Highways • Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc). • construction vehicle movements to be scheduled to avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. • encouraging the use of cargo bike deliveries throughout the construction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required. • The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1, and emerging City Plan 2040 policies HL2

	and VT1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.
54	**Threshold Levels** 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.
55	**Doors etc over public highway** No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.
56	**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.
57	**Stopping Up Order** 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.
58	**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 Houndsditch Pipe, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1.
59	**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.
60	**On-site Accessible Car Parking Bays** Two car parking spaces suitable for use shall be provide on the premises in accordance with the details shown on 1864-FPA-XX-GF-DR-A-16108 and shall be maintained throughout the lifetime of the development and be readily available of for use between 7am and 7pm for use by disabled occupiers and visitors without charge to the individual end users of the parking. REASON: To ensure the provision of suitable parking for people with disabilities in accordance with policy DM16.5 of the Local Plan.
61	**Unobstructed Headroom** A clear unobstructed minimum headroom of 4.75m must be provided and maintained for access ways and delivery and servicing area. REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with policy DM16.5 of the Local Plan.
62	**Oversailing** No part of the development, including any permanent or temporary structure such as balconies, canopies, building projections, scaffolding, or

	construction equipment, shall oversail or encroach upon the public highway unless and until a licence or other appropriate legal agreement has been entered into with the relevant Highway Authority under the Highways Act 1980 (or any statutory re-enactment or modification thereof). REASON: To ensure the safe and unobstructed use of the public highway and to comply with the requirements of the Highways Act 1980 in accordance with policies DM16.1 and DM16.2 of the Local Plan.
63	**Undersailing** No part of the development, including any basement, substructure, or other element of the building, shall extend beneath the public highway unless and until all necessary consents, licences, or agreements have been obtained from the relevant Highway Authority under the Highways Act 1980 (or any statutory re-enactment or modification thereof). REASON: To ensure the safe and unobstructed use of the public highway, and to comply with the requirements of the Highways Act 1980, in accordance with Policies DM16.1 and DM16.2 of the Local Plan.
64	**Refuse/ Recycling Storage and collection** Refuse and recycling, storage and collection facilities shall: (a) be provided within the curtilage of the site to serve each part of the development in accordance with details, must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and (b) thereafter be maintained as approved throughout the lifetime of the building. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes
	TfL Infrastructure Protection
65	**TfL Infrastructure Protection** The development hereby permitted shall not be commenced until the following documents (in consultation with London Underground), have been submitted to and approved in writing by the local planning authority which: a. Provide predicted short term and long-term ground movement effects of the works on LU structure or tunnels and in particular changes in

	stresses, changes in heave or settlement, distortion of the structure or tunnels due to required temporary and permanent works. b. provide detailed design and Risk Assessment Method Statement (RAMS) for both temporary and permanent works associated with demolition, excavation and construction of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling. The development shall then be implemented in accordance with the approved details. REASON: To ensure that the development does not impact on existing London Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
	Air Quality
66	**Emergency Power Supply** Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. Details of the appliance/plant must be submitted to and agreed by the LPA before installation. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time. The development shall then be implemented in accordance with the approved details. 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.
67	**Combustion Flues** 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, in

	accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.
68	**Air Quality Positive Assessment – Implementation Plan** Prior to the commencement of development, excluding demolition, an Implementation and Monitoring Plan for the Air Quality Positive Statement must be submitted to, and approved by the local planning authority. This should be completed in-line with the Greater London Authority Air Quality Positive LPG. The development shall be implemented in accordance with the approved details. Reason: In order to ensure all measures detailed within the Air Quality Positive Statement are implemented, therefore ensuring 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, policies SI 1 and emerging City Plan policy HL2.
69	**Non-Road Mobile Machinery** 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 SI 1. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
	Fire
70	**Fire Safety** The development shall be carried out in accordance with the approved details within the Fire Statement Reference: SKY2-ARUP-ZZ-XX-RP-YF-000001 Rev 01 prepared by ARUP and dated 31 January 2025. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.
	Suicide Prevention and Security
71	**Balustrade Details and Risk Assessment**

	Before any works thereby affected are begun, details of all balustrades and planting to external terraces and balconies, together with an 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 that there are appropriate safety measures in place in accordance with the guidance in the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) and the following policy of the Local Plan: CS3; and DM3.2.
72	**Security** Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development. REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.
73	**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 these protection measures, accompanied by a Couter Terrorism Risk Assessment and Vehicle Dynamics Assessment 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, and that any proposed protection measures are of a high quality design which does not negatively impact on the quality of the public realm, in accordance with the following policy of the Local Plan: CS3 and 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.
	Uses
74	**Offices** The areas shown on the approved drawings as offices and as set out in Condition 76 of this decision notice, 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 provisions 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.
75	**Flexible Uses** The area shown on the approved floor plans as the following flexible uses: - 125sqm (GIA) of flexile retail/food and beverage/ professional services (Use Class E (a/b/c) - 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g) - 205sqm (GIA) of flexible retail/food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (a/b/g), F1/F2). - 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2). And as set out in condition 76 of this decision notice, shall be used for those purposes only within the Use Class Order and for no other purpose 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 provisions 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.
76	**Uses** The development shall provide (all figures GIA and excluding plant): - 85,624sqm (GIA) of office floorspace (Use Class E(g)(i)) - 125sqm (GIA) of flexile retail/food and beverage/ professional services (Use Class E (a/b/c) - 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g)

	- 205sqm (GIA) of flexible retail/food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (a/b/g), F1/F2). - 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2). - 461sqm (GIA) of multi-functional space (Use Class Sui Generis) - 8sqm (GIA) externally accessible public lavatory (Use Class Sui Generis) - 11,363sqm (GIA) of ancillary basements REASON: To ensure the development is carried out in accordance with the approved plans.
	Approved Plans
77	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: 1864-FPA-XX-B2-DR-A-16060 1864-FPA-XX-B1-DR-A-16061 1864-FPA-XX-GF-DR-A-16062 1864-FPA-XX-01-DR-A-16063 1864-FPA-XX-02-DR-A-16064 1864-FPA-XX-03-DR-A-16065 1864-FPA-XX-04-DR-A-16066 1864-FPA-XX-05-DR-A-16067 1864-FPA-XX-06-DR-A-16068 1864-FPA-XX-07-DR-A-10007 (Demolition Scope Plan 07) 1864-FPA-XX-08-DR-A-16070 1864-FPA-XX-RF-DR-A-16071 1864-FPA-XX-XX-DR-A-16080 1864-FPA-XX-XX-DR-A-16081 1864-FPA-XX-XX-DR-A-16082 1864-FPA-XX-XX-DR-A-16083 1864-FPA-XX-L2-DR-A-16100 1864-FPA-XX-L1-DR-A-16101 1864-FPA-XX-B6-DR-A-16102 1864-FPA-XX-B5-DR-A-16103 1864-FPA-XX-B4-DR-A-16104 1864-FPA-XX-B3-DR-A-16105 1864-FPA-XX-B2-DR-A-16106 1864-FPA-XX-B1-DR-A-16107 1864-FPA-XX-GF-DR-A-16108 1864-FPA-XX-01-DR-A-16109 1864-FPA-XX-02-DR-A-16110 1864-FPA-XX-03-DR-A-16111 1864-FPA-XX-04-DR-A-16112 1864-FPA-XX-05-DR-A-16113

	1864-FPA-XX-06-DR-A-16114 1864-FPA-XX-07-DR-A-16115 1864-FPA-XX-08-DR-A-16116 1864-FPA-XX-09-DR-A-16117 1864-FPA-XX-10-DR-A-16118 1864-FPA-XX-11-DR-A-16119 1864-FPA-XX-12-DR-A-16120 1864-FPA-XX-13-DR-A-16121 1864-FPA-XX-14-DR-A-16122 1864-FPA-XX-15-DR-A-16123 1864-FPA-XX-16-DR-A-16124 1864-FPA-XX-17-DR-A-16125 1864-FPA-XX-18-DR-A-16126 1864-FPA-XX-19-DR-A-16127 1864-FPA-XX-20-DR-A-16128 1864-FPA-XX-21-DR-A-16129 1864-FPA-XX-22-DR-A-16130 1864-FPA-XX-23-DR-A-16131 1864-FPA-XX-24-DR-A-16132 1864-FPA-XX-25-DR-A-16133 1864-FPA-XX-26-DR-A-16134 1864-FPA-XX-27-DR-A-16135 1864-FPA-XX-28-DR-A-16136 1864-FPA-XX-29-DR-A-16137 1864-FPA-XX-30-DR-A-16138 1864-FPA-XX-31-DR-A-16139 1864-FPA-XX-32-DR-A-16140 1864-FPA-XX-33-DR-A-16141 1864-FPA-XX-34-DR-A-16142 1864-FPA-XX-35-DR-A-16143 1864-FPA-XX-36-DR-A-16144 1864-FPA-XX-37-DR-A-16145 1864-FPA-XX-38-DR-A-16146 1864-FPA-XX-39-DR-A-16147 1864-FPA-XX-40-DR-A-16148 1864-FPA-XX-41-DR-A-16149 1864-FPA-XX-42-DR-A-16150 1864-FPA-XX-43-DR-A-16151 1864-FPA-XX-44-DR-A-16152 1864-FPA-XX-45-DR-A-16153 1864-FPA-XX-RF-DR-A-16154 1864-FPA-XX-XX-DR-A-16200 1864-FPA-XX-XX-DR-A-16201 1864-FPA-XX-XX-DR-A-16202 1864-FPA-XX-XX-DR-A-16203 1864-FPA-XX-XX-DR-A-16300 1864-FPA-XX-XX-DR-A-16301 1864-FPA-XX-XX-DR-A-16302

	1864-FPA-XX-XX-DR-A-16303 1864-FPA-XX-XX-DR-A-16350 Proposed SLP SKY-GPB-XX-ZZ-L-DR-0030 P01 SKY-GPB-XX-00-L-DR-1000 P01 SKY-GPB-XX-01-L-DR-1001 P01 SKY-GPB-XX-02-L-DR-1002 P01 SKY-GPB-XX-03-L-DR-1003 P01 SKY-GPB-XX-04-L-DR-1004 P01 SKY-GPB-XX-ZZ-L-DR-1006 P01 SKY-GPB-XX-ZZ-L-DR-1007 P01 SKY-GPB-XX-27-L-DR-1008 P01 SKY-GPB-XX-28-L-DR-1009 P01 SKY-GPB-XX-00-L-DR-2000 P01 2001 P01 (General Arrangement - Level 01-05 Section) SKY-GPB-XX-27-L-DR-2002 P01 SKY-GPB-XX-28-L-DR-2003 P01 SKY-GPB-XX-ZZ-L-DR-2004 P01 SKY-GPB-XX-ZZ-L-DR-2005 P01 SKY-GPB-XX-ZZ-L-DR-3000 P01 SKY-GPB-XX-ZZ-L-DR-4400 P01 1864-FPA-XX-45-DR-A-20045 02 1864-FPA-XX-RF-DR-A-20046 02 22-166-T-039 Rev E Oversailing Plan 22-166-T-040 Rev C Stopping Up Plan 22-166-T-041 Rev B Initial 278 Proposal 22-166-T-042 Rev B Undersailing Plan 1864-FPA-XX-XX-DR-A-22100 1864-FPA-XX-XX-DR-A-22101 1864-FPA-XX-XX-DR-A-22102 1864-FPA-XX-XX-DR-A-22103 33158-HML-XX-B6-SK-N-011001 P01 33158-HML-XX-B1-SK-N-011001 P01 33158-HML-XX-44-SK-N-011001 P01 33158-HML-XX-45-SK-N-011001 P01 33158-HML-XX-ZZ-SK-M-111004 P02 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	**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.
	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.
2	**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 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.
3	**Whole Life Carbon Assessment** The post-construction Whole Life Carbon Assessment should be submitted to the GLA along with any supporting evidence as per the guidance no later than three months post as-built design completion: ZeroCarbonPlanning@london.gov.uk Applicants are strongly encouraged to also submit the WLCA to the Built Environment Carbon Database (BECD). The reason for this is for evidence collection and monitoring to support the reduction of whole life carbon emissions in the Local Planning Authority and Greater London.
4	**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.
5	**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.
6	**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)
7	**Environment Agency** The Environment Agency advises the following: 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.

8	**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'.
9	**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) The following details should be provided before the crane is erected: • the crane's precise location • an accurate maximum height • start and completion dates
10	**Plant Noise** Environmental Health advise the following in respect of the Plant Noise condition: 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.
11	**Thames Water Assets**

	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
12	**Sewage Flooding Prevention** As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section
13	**Public Sewers** Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.
14	**Water Pressure** 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.
15	**Water Mains**

	There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. **https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes**
16	**Archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall** The archaeological and historical interpretation strategy should be prepared in consultation with Historic England.

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Hackney Council
Planning Service
1 Hillman Street
London E8 1DY
www.hackney.gov.uk
Hackney
Reference:2025/0632

Mr Georgia McBirney
P O Box 270 Guildhall
London

EC2P 2EJ

24-03-2025

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application Number: 2025/0632

Site Address: 63 St Mary Axe, London, EC3A 8AA

Development Description: Notification from the City of London of application 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 1 Hillman Street, London, E8 1DY, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours sincerely

[redacted]

Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy

PLANNING DECISION NOTICE

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

Agent:

Applicant: Georgia McBirney

P O Box 270 Guildhall
London
EC2P 2EJ

Part 1- Particulars of the Application

Application No: 2025/0632

Date of Application: 17-03-2025

Date Validated: 18-03-2025

Application Type: Adjoining Borough Observations

Proposal: Notification from the City of London of application 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former

churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Location: 63 St Mary Axe, London, EC3A 8AA

Plan Numbers:

Part 2 – Particulars of Decision: **No Objection**

Date of Decision: 24-03-2025

Yours sincerely

[redacted]

Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy

From: [redacted]
To:
Subject: LPA Reference: 25/00223/FULEIA Standing Advice Response
Date: 25 March 2025 15:56:15

THIS IS AN EXTERNAL EMAIL

LPA Reference: 25/00223/FULEIA

ATE Reference: ATE/25/00441/FULL

Site Address: 63 ST MARY AXE, LONDON, EC3A 8AA

Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:
https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter **@activetraveleng**

Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000003Dxa1IAC;7bb557de2417b28eeb398d528fdc69f5:ref]

LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

26 March 2025

Georgia McBirney
Environment Department
City of London
PO Box 270, Guildhall
London EC2P 2EJ

Dear Georgia

Re: Planning Application No: 25/00223/FULEIA – Demolition of existing buildings and the construction of a 45 storey building with associated works at 63, St Mary Axe, London

Our Ref: LGW5790

Thank you for your letter/email dated 17 March 2025, regarding the above-mentioned consultation.

The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. We therefore have no objection to this proposal in relation to Gatwick Airport.

Please note that the 'The Town & Country Planning (Safeguarded Aerodromes, Technical Sites & Military Explosives Storage Areas) Direction 2002', in Annex 2 under 'High Structures', requires the Local Planning Authority to notify the CAA in relation to any proposed buildings/structures at 91.4m (AGL) or above as soon as permission has been granted. The Safeguarding Circular can be found at Safeguarding aerodromes, technical sites and military explosives storage areas - GOV.UK

The contact email is AROps@caa.co.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: [redacted]

From: [redacted]
To: [redacted]
Subject: RE: Planning Application Consultation: 25/00023/FULEIA
Date: 28 March 2025 09:39:22
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

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA Crane notification | Civil Aviation Authority (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

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] | 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: 17 March 2025 11:42
To: CEI - Airport Safeguarding/BAA <[redacted]>
Subject: Planning Application Consultation: 25/00223/FULEIA

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir/Madam

Please see attached consultation for 63 St Mary Axe London EC3A 8AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Georgia McBlinney
Environment Department
City of London

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From: [redacted]
To:
Subject: RE: Planning Application Consultation: 25/00223/FULEIA [SG37805]
Date: 28 March 2025 11:03:02
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37805

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: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 17 March 2025 11:44
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: Planning Application Consultation: 25/00223/FULEIA

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 63 St Mary Axe London EC3A 8AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Georgia McBirney
Environment Department
City of London
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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15

LPA Ref: 25/00223/FULEIA

London City Airport Ref: 2025/LCY/078

Date: 28/03/2025

Dear Georgia McBirney,

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	25/00223/FULEIA
Proposal	Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.
Location	63 St Mary Axe London EC3A 8AA
Borough	City of London
Case Officer	Georgia McBirney

London City Airport's response must change to an objection unless the condition is applied to this planning permission.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of

obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also make the following observations:

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

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.

Kind regards,

Simon Vince
On behalf of London City Airport

From:	Haringey Planning Services
To:	PLN - Comments
Subject:	Decision Notice - HGY/2025/0700
Date:	31 March 2025 16:15:04

THIS IS AN EXTERNAL EMAIL

Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) Order 2015

Application No:	HGY/2025/0700
Proposal:	Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118 (Observations to City Of London - their planning reference 25/00223/FULEIA)
Site Address:	63 St Mary Axe, London, EC3A 8AA

Dear Sir/Madam,

I am writing to inform you that Haringey Council raises NO OBJECTION to the above request for observations.

Thank you,

Head of Development Management and Planning Enforcement

Planning Service

[ref:a0iTu00000129ZhIAI;63cdcff98d7adcc6315f8396b074883c:ref]

Planning | Placemaking and Housing | Haringey Council

Alexandra House (5th Floor), 10 Station Road, London, N22 7TR
www.haringey.gov.uk/planning-and-building-control/planning

Planning and Place
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place
Amanda Reid

THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Georgia McBirney
City of London
Environment Department
PO Box 270 Guildhall
LONDON
EC2P 2EJ

Date: 02/04/2025
My Ref: OB/25/01627
25/00223/FULEIA

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

63 St Mary Axe London EC3A 8AA

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

SCHEDULE

Development:	This Council is asked for its observations on an application submitted to the City of London for: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118
Site Address:	**63 St Mary Axe London EC3A 8AA**
RBKC Drawing Nos:	OB/25/01627
Applicant's Drawing Nos:	available on City of London website at

https://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SRJ3RVFHIH400

Application Dated: 17/03/2025

Application Completed: 17/03/2025

FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S) ATTACHED OVERLEAF

CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION

INFORMATIVE(S)

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see Advice for Builders on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at **http://www.rbkc.gov.uk/OB/25/01627 .** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid
Director of Planning and Place

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/297201 **.** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Tel: [redacted]

City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Directorate of Place and Growth
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

25/1009/K
Your Ref: 25/00223/FULEIA
03 April 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:	**63 St Mary Axe London EC3A 8AA**
Applicant:	**C/O Agent**
Proposal:	**Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.** **This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**
Drawings	Consultation Letters

I refer to your letter dated 17 March 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

SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0018

Date of issue of this decision: 07/04/2025

LBS Reg. No.: 25/OB/0018	**Date of Issue of Decision:** 07/04/2025
Your Ref No.:	

Applicant City Of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with
basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.'

At 63 St Mary Axe London EC3A 8AA

In accordance with your letter received on 18 March 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Historic England

Ms Georgia McBirney
Planning Administration
Environment Department
City of London Corporation

Your Ref: 25/00223/FULEIA
Our Ref: 231485

Contact: Helen Hawkins
[redacted]

08 April 2025

Dear Ms McBirney,

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

63 St Mary Axe London EC3A 8AA
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 March 2025.

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

Assessment of Significance and Impact

GLAAS advises the City of London on their non-designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter.

The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable.

Significance

The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings –this is explained further in the Development Advice letter.

At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street.

Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period.

An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial

ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset –the burial ground –into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'.

Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset.

Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well-preserved Roman deposits were encountered. This is a significant omission.

Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it.

Impact

Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains.

The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully compensated for by the proposed new park design for the area.

The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new

development. The Scoping response also requested that the results of the proposed pre-determination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided.

The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works.

The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Policy

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 and that a field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

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

The City Local Plan Policy DM 12.4 requires that 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 and that schemes preserve, protect, safeguard and enhance archaeological monuments, remains …where appropriate. The supporting text says "The City Corporation will refuse schemes which do not make any provision for the incorporation, safeguarding or preservation in situ of nationally or locally important monuments or remains, or which would adversely affect those monuments or

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.

remains".

If preservation is not achievable then 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.

Conclusion and Recommendations

The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed.

The development proposal as submitted would result in the total loss of this non-designated heritage asset.

We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision.

Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken.

If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

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

This response relates solely to archaeological considerations.

Yours sincerely

Helen Hawkins

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

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Your Ref:
Our Ref: 25/00873/OBS

Lambeth

Georgia McBirney

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

11th April 2025

RE: REQUEST FOR OBSERVATIONS

Dear Georgia McBirney

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: 25/00873/OBS Date of Application: 18.03.2025 Date of Decision 11.04.2025

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 Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development at 63 St Mary Axe London EC3A 8AA.

Approved Plans

Consultation letter from City of London dated 17 March 2025

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Conditions

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 11th April 2025

Georgia McBirney
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/137997/01
Your ref: 25/00223/FULEIA

Date: 15 April 2025

Dear Georgia

63 St Mary Axe, London, EC3A 8AA.

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Thank you for consulting us on the above application on 17 March 2025. Please accept our apologies for the delay in getting back to you.

Environment Agency Position
Whilst we have **no objections** to this application, we would like to draw your and the applicant's attention to the following advisory comments.

Advice to Local Planning Authority and applicant

Development in close proximity to activity regulated by an Environment Agency permit advisory.
New developments within 75m metres of Medium combustion plant (MCP) could result in impacts including the nearby community being exposed to fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations (EPR) require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

Advice to Local Planning Authority

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites.
Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Use of Sustainable Drainage Systems (SuDS)
Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS

manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

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.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Demitry Lyons
Sustainable Places Planning Advisor

Email: hnlsustainableplaces@environment-agency.gov.uk
Telephone: 020 7714 0578

From: [redacted]
To:
Subject: 63 St Mary Axe, London, EC3A 8AA. Application no. 25/00223/FULEIA
Date: 16 April 2025 14:09:40
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png

You don't often get email from [redacted]
THIS IS AN EXTERNAL EMAIL

FAO Georgia McBirney

Dear Georgia,

Thank you for notifying the Council for British Archaeology of the above application.

We do not wish to make detailed comments on existing proposals at this stage, but would like to express our serious concerns over the applicant's failure to follow the clear advice offered by GLAAS at a pre-application stage.

The application site is highly archaeologically significant, with remains from the Roman period and a medieval and post-medieval burial ground. Archaeological evidence about the city's past is a finite resource of high evidential value, and this site is extremely rare in that there are no records of modern development which would have disturbed the surviving archaeological remains. The proposed new development on this site would cause permanent and substantial harm to this archaeology. This harm cannot be justified by an archaeological mitigation strategy (under para. 218 of the NPPF).

The application does not demonstrate an adequate understanding of the significance or nature of the archaeological remains on the site, as required by para. 207. The probable presence of undisturbed Roman archaeology is not acknowledged and insufficient assessment work has been done to enable an understanding of the site and the survival of archaeological remains, against the previous advice offered by GLAAS.

The CBA do not consider that this application meets the requirements of para 207 of the NPPF or Policy HE2 of the City Plan 2040. Unless a detailed archaeological evaluation is undertaken and a detailed scheme of mitigation works is agreed with GLAAS, we recommend that this application be **refused** due to insufficient information and the substantial harm which would be caused to the unique archaeology of the site.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

We would be grateful if these comments could be uploaded to the planning portal.

Kind Regards,
Dr Alison Edwards
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications –notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.

Alison Edwards
[she/her]
Listed Building Caseworker / JCNAS database coordinator

Please note my normal working days are Monday-Thursday

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De Grey House | St Leonard's Place | York | YO1 7HE
01904 671417



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Historic England

Ms Georgia McBirney
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01590237

16 April 2025

Dear Ms McBirney

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

63 ST MARY AXE LONDON EC3A 8AA
Application No. 25/00223/FULEIA

Thank you for your letter of 17 March 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

These proposals would harm attributes of the Tower of London World Heritage Site's Outstanding Universal Value and consequently harm its integrity. This weighs very heavily against the application.

The proposal includes revealing and conserving the London Wall scheduled monument. This would represent an enhancement of its significance and the ability to appreciate it. However, we are concerned that removing the associated, non-designated burial ground (which forms part of the London Wall's setting that is likely to contribute highly to its significance) may cause a level of harm that would not be outweighed by the heritage benefit of showcasing the wall, nor would it be capable of outweighing the harm to the World Heritage Site.

The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich. The Greater London Archaeological Advisory Service (GLAAS) has advised that further information is required to fully assess the nature of the harm which may be caused by the development.

Our advice does not preclude the redevelopment of the site, but these considerable heritage impacts together indicate that the proposals represent neither sustainable

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development as required by national planning policy, nor the optimum capacity for the site, as required by the London Plan's design-led approach. It would be possible to redevelop the site without causing the harm we have described and we encourage that this should instead be pursued. We recommend that planning permission for the current proposals should therefore not be granted.

Historic England Advice

Significance of heritage most affected by the proposed development

There are three heritage assets that we consider would be most affected by the proposed development. The Tower of London World Heritage Site and The London Wall scheduled monument are the subject of this advice letter. An assessment of the total loss of the burial ground on the site, a non-designated heritage asset, is provided by the Greater London Archaeological Advisory Service in a separate consultation response, but we note that impact here too, in considering the proposal in the round.

a) The Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016), convey its Outstanding Universal Value. They reflect the Tower as a model example of the development of a medieval fortress palace and its role as the site of many significant episodes of European history. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The Statement of OUV (SOUV) adopted by the World Heritage Committee, in the section relating to integrity, notes that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.'

The physical relationship of the Tower with the City as viewed from the river is central to understanding its Outstanding Universal Value (OUV). The view from the north bastion of Tower Bridge towards the Tower of London, View 10A.1 in the London View Management Framework (LVMF), has become historically important as a long-established picture post card view. It forms part of a kinetic experience of the Tower and wider London skyline along the bridge. Views of the Tower from this location showcase the Tower's attributes including as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance.

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These attributes were considered in detail during the Tulip public inquiry. The Inspector found that they ‘rely to a great extent on its setting’ (IR 14.25) and, of the latter three attributes, ‘the sky space component…is central to its OUV’ (IR 14.29).

The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London. While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower’s turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height.

b) The London Wall scheduled monument

This section of the Roman and medieval city wall is scheduled as ‘London Wall: remains of Roman wall and bastion, Camomile Street’ (NHLE reference 1005547). We know from previous excavations that much of this section of wall has been removed previously, retaining only a small section of wall below the current building.

Although the wall was first built by the Romans around AD 200, it continued to provide defence and security to Londoners into the turbulent medieval period. It also created a marked boundary for the city, a boundary that was both physical but also social, as it served to demarcate space for certain activities, such as burials.

In the Roman period, cemeteries were always placed outside the walls of the city. There is an obvious shift in practice during the medieval period, where cemeteries are in consecrated grounds associated with churches, and therefore allowed inside the walls of the city.

The non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich exemplifies this, as it is situated immediately inside the city wall and utilises the wall as its northern boundary. It serves to illustrate both the historical development of the London Wall as a physical and social boundary, and how the wall was integrated into the wider cityscapes of Roman and medieval London. Therefore, there is a direct historic association of the non-designated burial ground and the London Wall, which contributes strongly to our appreciation and understanding of the significance of the scheduled monument.

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There are limited places within the city where the wall retains its relationship with associated Roman and/or medieval archaeological remains. Until archaeological evaluation of the burial ground is carried out, we cannot confirm the level of survival of the burial ground. There is also the potential for other remains to be present here which pre-date the burial ground, possibly to the Roman period, which cannot be identified or assessed without proper evaluation. We therefore have to assume on the basis of desk-based evidence that, at a minimum, the burial ground is largely intact and that it retains its evidential value.

The setting of this section of London Wall is therefore likely to contribute highly to its significance.

c) The medieval and post-medieval burial ground

In addition to the importance of the burial ground in its relationship with the London Wall scheduled monument, the burial ground also has significance in its own right as a non-designated heritage asset.

The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich.

Further information on the burial ground and its significance is provided to you in an accompanying letter from the Greater London Archaeological Advisory Service.

Impact of the proposals on these heritage assets

a) The Tower of London

Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed detailed design. The additional height that would be introduced at its eastern edge, would result in an upward step in scale directly beside the White Tower, creating a greater cliff edge than the current situation.

The further encroachment of this development into the sky space around the Tower would present a greater distraction in views of its silhouette. The White Tower's silhouette is recorded in the 2016 WHS Management Plan as a key component of the World Heritage Site's attributes of OUV as an internationally famous monument, in a landmark siting, and reflecting the physical dominance of the White Tower. The latter

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reflects the Tower as a symbol of Norman power - an appreciation of this is similarly reliant on the clear sky backdrop.

The proposed building would appear different to the character of the existing cluster because of the unusual form that results from its eastern edge being twisted to face south, the staggered terraces and the contrast of materials on that eastern edge. It would therefore be more eye-catching than the existing Cluster buildings, which would compound the impact described above. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above.

The experience from Tower Bridge, as an example of the views of the Tower where this harm would be appreciated, is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it.

The proposals would leave less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City. The important sky space around its silhouette, which is essential to sustaining the attributes and values of the Tower discussed above, would be further compromised when compared to the existing situation. This would add to the cumulative harm to the attributes of OUV described above.

In its Technical Review report on the refused schemes at 31 Bury Street, regarding the LVMF view 10A.1, ICOMOS advised that "when that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. Whilst that comment concerned a different scheme - proposals at 63 St Mary Axe would be shorter - it is notable that the silhouette of the White Tower and its visual separation from the City would be impacted in a similar way.

b) The London Wall scheduled monument

The current proposals have been developed to include an area from which the London Wall can be readily viewed by the public.

We currently do not know what the condition of the wall is; however, there will likely be a need for a programme of conservation and/or consolidation. There will also likely be further design considerations that would need to respond to the condition of the wall when revealed. Specifically, there will be a need for closer analysis of the likely

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environmental conditions of the proposed space and if they would be appropriate for preserving the wall.

There is a small potential for harm to the fabric of the wall which could result from exposing it to the wider environment. However, it is likely that this harm could be adequately limited through appropriate conservation works, suitable environmental controls, and commitment to a programme of ongoing management. Therefore, we think that the proposals for revealing the wall within the design would enhance the significance of the monument through increasing its legibility and accessibility.

However, we also consider that there would be harm to the scheduled monument caused by the complete removal of the non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. Removal of the burial ground will likely destroy archaeological remains which have a direct historical association with the London Wall and which contribute to an understanding and appreciation of the scheduled monument.

The extent of this harm cannot be fully defined as no archaeological evaluation has been undertaken to confirm the level of retention of archaeological remains within the burial ground and to characterise any remains.

It should also be noted that no assessment of impacts on the London Wall scheduled monument (both adverse and beneficial) has been presented as part of the Environmental Statement or Archaeological Desk Based Assessment.

c) The medieval and post-medieval burial ground

As previously stated, the archaeological advisor for the City of London is the primary contact for advice in relation to the burial ground as a non-designated heritage asset.

However, we note here her position that the development proposal as submitted would result in the total loss of this non-designated heritage asset and that the impact of development on the burial ground has not been properly assessed in the Environmental Statement due to a lack of archaeological evaluation.

Relevant policy and guidance

a) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations

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under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

The Framework sets out a presumption in favour of sustainable development. This requires pursuing three overarching objectives (economic, social and environmental) in mutually supportive ways - including the protection of the historic environment (Para 8).

Chapter 16 of the NPPF concerns the historic environment. Para 202 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required, including any contribution made by their setting. Where the site has the potential to include heritage assets with archaeological interest, it may be necessary that a field evaluation is also undertaken (Para 207).

Significance should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Para 208).

If harm is deemed to be less than substantial, harm should be weighed against the public benefits of the proposals (Para 215). Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Para 212). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Para 213).

It is also clear that, regardless of the ability to record evidence of our past (such as through a programme of archaeological works), this should not be a factor in deciding whether such loss should be permitted (Para 218).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 139 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

b) The London Plan

Polic HC1 requires development proposals to avoid harm by integrating heritage considerations early in the design process

Policy HC2 World Heritage Sites requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

The Tower of London is identified in the Plan as one of three Strategically Important Landmarks for London, and the importance of managing its setting is recognised in the strategic views policies HC3 and HC4, and the London View Management Framework (LVMF SPG, Mayor of London, 2012).

The LVMF reinforces that “new development should not harm a viewer’s ability to appreciate the OUV of a WHS” (Para 57). Specific to view 10A, it states that the Tower of London should not be dominated by new development close to it” and that “some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background” (Paragraphs 183 and 186)

Policy D3 requires a design-led approach for optimising sites, which means ensuring that development is of the most appropriate form and land use for the site. This requires consideration design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth.

Policy D9 states that any tall building “must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it”.

c) Historic England’s GPA3 ‘The Setting of Heritage Assets’ (2017)

GPA 3 sets out guidance on how to understand and assess the contribution of setting to the significance of a heritage asset The setting of a heritage asset is defined by the NPPF as ‘the surroundings in which a heritage asset is experienced’ (NPPF, Annex 2: Glossary). It also makes clear that setting ‘may include associative relationships’ (p.3).

It recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on

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significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

§ Proximity to asset
§ Position in relation to key views to, from and across
§ Prominence, dominance or conspicuousness
§ Competition with or distraction from the asset
§ Dimensions, scale and massing
§ Materials (texture, colour, reflectiveness, etc)
§ Change to skyline, silhouette
§ Lighting effects and 'light spill'

In regard to buried assets such as the London Wall, GPA3 makes clear that although the remains 'may not be readily appreciated by a casual observer', they retain a presence in the landscape' (p.5) and that:

> *Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the longterm continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible*. (p.5)

Historic England's position

The proposals would cause harm to attributes of OUV of the World Heritage Site, the significance of the scheduled monument and result in the total loss of the non-designated burial ground. Overall, we do not consider that the proposals have been developed in a way that sufficiently accords with the requirements of national and regional planning policy, which stipulate that heritage significance must inform the form of development proposals early on in the process.

Our advice does not preclude the redevelopment of the site. Harm could be greatly reduced, or potentially avoided, in each case with a lower building, which would avoid all three elements of heritage harm (to attributes of OUV of the WHS, the significance of the monument and the total loss of significance of the burial ground) while still achieving a considerable uplift in office space, thereby delivering sustainable development.

Such a scheme would accord with the design-led approach required by the London Plan, responding to all elements of the site's highly significant heritage context and its capacity for growth.

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a) The Tower of London World Heritage Site

Whilst the proposals were reduced in scale in response to our pre-application advice, we do not consider that this has adequately reduced the harmful impact. These proposals would continue to have a comparable impact to the 31 Bury Street proposals. That application (ref. 24/00021/FULEIA) was recently refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated.

In this case, we consider that the same attributes of OUV (as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance) and the integrity of the WHS would be harmed. We therefore recommend that the current application should be refused for the same reason.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the WHS. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals.

The submitted heritage impact assessment features many inconsistencies with the methodology required by UNESCO, the adopted SOUV and previous commentaries from ICOMOS as an advisory body to the World Heritage Committee. It has scoped out attributes of OUV where setting makes an important contribution (attributes that were identified in the Tulip decision, set out above). Furthermore, it has not assessed the kinetic impact, instead treating the viewpoint as static, and presents a limited assessment of the cumulative impact of the proposals.

ICOMOS has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (31 Bury Street Technical Review, 20/00848/FULEIA; 24/00021/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA). The World Heritage Centre subsequently

requested that the UK State Party submit a State of Conservation Report for the WHS, indicating UNESCO's serious concerns.

The application submission does not therefore adequately assess the impact on attributes of OUV, which is required by Para 200 of the NPPF and Policy HC2 of the London Plan.

b) London Wall scheduled monument

In relation to the London Wall scheduled monument, we acknowledge that there is a more complex exercise to be had in weighing the level of harm caused by complete removal of the non-designated, but associated, medieval burial ground and the enhancements proposed through exposing the wall, providing interpretation, and expressing it further through elements of the design.

This weighing exercise is further complicated by the lack of archaeological evaluation, and therefore the lack of key details regarding the condition and nature of the archaeological resource here. The Environmental Statement has not assessed impacts (adverse or beneficial) to the scheduled monument. However, we think that removing the associated, non-designated burial ground (which forms part of the London Wall's setting) would cause a level of harm to the scheduled monument which would not be outweighed by the heritage benefit of showcasing the wall.

Recommendation

Historic England objects to the application on heritage grounds. We recommend that it should be refused or withdrawn.

We note that the advice provided to you by the Greater London Archaeological Advisory Service recommends that further assessment of the impact of development on the burial ground be provided. As the burial site is intricately linked to the London Wall, we agree that further information and an assessment of the impacts on the scheduled monument should be required through a Regulation 25 request.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred

until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

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.

Please contact me if we can be of further assistance.

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
E-mail: [redacted]

Chris Reade
Inspector of Ancient Monuments
E-mail: [redacted]

Cc Helen Hawkins, GLAAS

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HISTORIC ROYAL PALACES

Environment Department (Planning)/Development Management
City of London
PO Box 270
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London EC2P 2EJ

FAO Ms Georgia McBirney
By email to [redacted]

22 April 2025

Ref: 63 St Mary Axe, London EC3A 8AA

Planning Ref: 25/00223/FULEIA

Dear Ms McBirney,

We write in relation to the current consultation on the above referenced planning application, to express HRP's concerns about aspects of the scheme, which relates to the redevelopment of the site at 63A St Mary Axe, based on its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS).

HRP has previously been invited to view proposals for the site while these were in development, in March and July 2023. In response to the scheme presented in July 2023, which had been amended since March, HRP advised that it welcomed the reduction in height of 3 storeys and some enhancement in the lean away from the White Tower that had been achieved. However, it emphasised it wished to see a greater degree of lean-in to the eastern apex of 100 Leadenhall Street to enhance the sky space between the White Tower and better define the eastern edge of the City Cluster, and to preserve the LVMF view 10A.1 which is the key view that has most impact on the OUV of the World Heritage Site in terms of this proposed development. HRP also highlighted that, although the proposals sat within the draft city cluster profiles at that time, HRP was not in agreement with the tall vertical edge of that profile on the eastern edge and indicated it would be advocating for a more angled profile during the formal consultation (which it has since done so).

With regard to the submitted proposals (ref 25/00223/FULEIA), HRP wishes to reiterate its concerns about the profile and massing of the proposed tower element of the development, and its impact on the silhouette of the White Tower in LVMF view 10A.1. Whilst the slant achieved since the earlier iterations of the design are acknowledged, HRP maintains that the impacts on the OUV of the Tower of London

Historic Royal Palaces
Tel +44(0)20 3166 6000 www.hrp.org.uk
Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)
The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

HISTORIC ROYAL PALACES

could(should) be further mitigated with a steeper lean and a further reduced height.

HRP would also highlight that there remains a lack of consensus over the appropriate outline for the City Cluster, including at the eastern edge. Although the design appears to continue to sit within the proposed cluster profile, HRP does not agree that this provides sufficient protection to the Tower of London and LVMF view 10A.1. It therefore requests that the profile is modified as suggested above to mitigate the impact on the silhouette of the White Tower and thereby help to preserve the OUV of the Tower of London.

HRP is also concerned that the lower-level shoulder of the proposals might be more apparent in winter, without the benefit of tree cover, and requests that winter versions of View 10A.1 are provided so that this risk can be reviewed.

Please do not hesitate to get in touch with me should you wish to discuss any of the issues raised here further.

Yours faithfully

[redacted]

Adrian Phillips
Palaces & Collections Director
T [redacted]

Date: 22 April 2025
Our ref: 507023
Your ref: 25/00223/FULEIA

FAO Georgia McBirney
City of London Planning

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Madam,

Planning consultation: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis);the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St. Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development
Location: 63 St Mary Axe London EC3A 8AA

Thank you for your consultation on the above dated 17 April 2025 which was received by Natural England on 17 April 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

Richard Gibson
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).

Place Division / Development Management
Web: www.richmond.gov.uk/planning
Email: envprotection@richmond.gov.uk
Tel: 020 8891 1411
Textphone: 020 8891 7120

LONDON BOROUGH OF RICHMOND UPON THAMES

City Of London
63 St Mary Axe London EC3A 8AA

RECOMMENDATION DATED
23 April 2025

Dear Sir/Madam,

The Town and Country Planning Act 1990, (as amended)
Consultation – Raise no Objection

Application: **PA25/0698**
Type: Consultation Other
Our ref: DC/KEM_PA25/0698
Applicant: City Of London
Agent:

LOCATION
63 St Mary Axe London EC3A 8AA

for

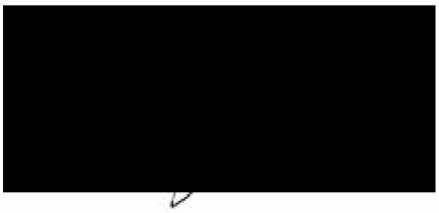
PROPOSAL
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

That the City Of London be advised that the London Borough of Richmond upon Thames raise no objection to the above mentioned proposal.

Yours faithfully,



Robert Angus
Head of Development Management (Richmond)

From: Gregory Barrett <[redacted]>
Sent: 02 May 2025 10:10
To: McBirney, Georgia <[redacted]>
Cc: Oliver Caroe <[redacted]> ; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for the extension of time to review these documents. Following our review, we offer no further comment on the scheme.

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

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Please be assured I do not expect a reply outside normal working hours.

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Office 5, Unit 8; 23-25 Gwydir Street
Cambridge CB1 2LG
Tel: 01223 472237

London Office:
The Surveyor's Office, The Chapter House, St Paul's Churchyard
London EC4M 8AD
Tel: 020 7246 8341

Visit our website: caroe.com

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From: McBirney, Georgia <[redacted]>
Sent: 02 April 2025 10:45
To: Gregory Barrett <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

Good morning, Greg,

Thank you for your email below. We can agree to the extension until the 2nd May, if you are in a position to provide your comments earlier than the 2nd that would be appreciated.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

From: Gregory Barrett <[redacted]>
Sent: 01 April 2025 11:53
To: McBirney, Georgia <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for this. We also have periods of imminent upcoming leave, so might the 2nd May be workable?

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

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From: McBirney, Georgia <[redacted]>
Sent: 28 March 2025 08:58
To: Gregory Barrett <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

Good morning, Greg,

Thank you for your email below.

In terms of an extension to the consultation period, do you know how much longer you would need to respond to the consultation request.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

From: Gregory Barrett <[redacted]>
Sent: 27 March 2025 17:14
To: McBirney, Georgia <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

We have recently received notification of consultation for 63 St Mary Axe.

As we discussed recently with your colleague Tom Nancollas (copied in), we are dealing with a variety of planning caseload tasks related to the City at the moment - principally our representations and preparation for the forthcoming *City Plan 2040* Examination in Public.

As such, could we please request an extension to the deadline for us to respond?

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]

on behalf of Caroe Architecture Ltd

I may send email outside normal working hours from time to time.
Please be assured I do not expect a reply outside normal working hours.

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Website: http://www.cityoflondon.gov.uk

Georgia McBirney
City of London Corporation
By Email

Our ref: 2025/0190/S1
Your ref: 25/00223/FULEIA
Date: 6 May 2025

Dear Georgia McBirney

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
63 St Mary Axe, London, EC3A 8AA
Local Planning Authority reference: 25/00223/FULEIA

I refer to the copy of the above planning application, which was received from you on 20 March 2025. On 6 May 2025, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0190/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 86 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If the City of London Corporation subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the City of London Corporation under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, email [redacted]

Yours sincerely

[redacted]

John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
Emily Keenan, Agent, DP9

GREATER**LONDON**AUTHORITY

Planning report GLA/2025/0190/S1/01

6 May 2025

63 St Mary Axe

Local Planning Authority: City of London Corporation

Local Planning Authority reference: 25/00223/FULEIA

Strategic planning application stage 1 referral
Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal
Demolition of the existing office buildings and construction of an office-led mixed-use development consisting of a 46-storey building with office, cultural and community uses.

The applicant
The applicant is **AXA Investment Management,** and the architect is **Fletcher Priest Architects.**

Strategic issues summary
Land use principles: The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations.
Urban design and heritage: The proposed building is of high architectural quality and will deliver new public realm, however a final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.
Transport: Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics.
Other issues on **environment and sustainable infrastructure** also require resolution prior to the Mayor's decision making stage.

Recommendation
That the City of London Corporation be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 86. Possible remedies set out in this report could address these deficiencies.

Context

1. On 20 March 2025, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following category of the Schedule to the Order 2008:

   Category 1C *(b) a building that is more than 150 metres high and is in the City of London*

3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the City of London Corporation to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk

Site description

6. The 0.06 hectare site comprises two buildings constructed in the 1980s, the 8-storey Camomile Court to the west and the 9-storey 63 St Mary Axe to the east, which contain predominantly office uses. The site is bounded by Bevis Marks, Outwich Street, Houndsditch, and St Mary Axe. The site is located within the Central Activities Zone (CAZ) and is located near several tall buildings such as Salesforce Tower, 100 Bishopsgate, the Pan Pacific London and 70 St Mary Axe.

7. The site contains a Scheduled Monument (remains of a Roman wall) and remains of a burial ground. The site is in the setting of The Tower of London World Heritage Site (WHS) but not within its Buffer Zone. The site falls within London View Management Framework (LVMF) Views 4A.1 Primrose Hill, 10A.1 City Hall to the White Tower, 15B.2 Waterloo Bridge and 25A.1 to 3 The Queen's Walk at City Hall.

Details of this proposal

8. Demolition of the existing office buildings and construction of an office-led mixed-use development consisting of a 46-storey building with office, cultural and community uses.

Case history

9. The GLA held pre-application meetings with the applicant team (also attended by the City Corporation) in April 2022, October 2022, November 2023, and February 2024 in respect of proposals to redevelop this site for a phased mixed-use redevelopment of the site. Previous pre-application meetings were held in 2013, 2019 and 2020. The applicant was advised that the uplift of high-quality office floor space in the CAZ was strongly supported, however, concerns were raised with the potential impacts of the tall building on the setting of the WHS.

10. The London Review Panel (LRP) undertook a design review with GLA and City officers, and applicant, on 17 May 2024. The LRP were broadly supportive of the proposals, with comments provided on the quality of the public realm and accessibility of spaces, facades and planting, and sustainability.

Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021; and the City of London Local Plan 2015.

12. The following are also relevant material considerations:

    The National Planning Policy Framework and National Planning Practice Guidance;

    Tower of London World Heritage Site Management Plan;

    Tower of London Local Setting Study: An Assessment of the Local Setting of the Tower of London and Guidelines for its Management (August 2010);

    Draft City Plan 2040; and

    Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on land use principles, urban design, heritage, transport, sustainability, and environment, which can be found on the GLA's website here.[1]

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507

Land use principles

13. The proposal for an office-led mixed-use redevelopment of the site, providing an uplift of 85,624 sq.m. of office floor space in the CAZ, is strongly supported in land use terms, in line with Policies SD4 and E1 of the London Plan. The applicant is not providing affordable workspace in line with Policy E3 of the London Plan. Given this is not required by local policy, the non-provision is acceptable in this instance.

14. The proposed development includes 4,006 sq.m. of cultural and community uses and 461 sq.m. of multi-functional space. Although the site is not located in a specific cultural quarter of the CAZ, the use of part of the building for cultural floorspace is strongly encouraged as it would help to enhance and expand London's cultural assets in line with Policies HC5 and SD4 of the London Plan. Further details on the use, access, fit-out and future management of the cultural uses should be provided to the City Corporation and be appropriately secured by condition or obligation. Any community use on the site should be fully accessible to the public and a community use agreement and management plan should be secured in a S106 agreement in line with Policy S1 of the London Plan.

15. Overall, the redevelopment of the site is strongly supported in principle, subject to addressing the issues set out in this report.

Urban design

16. The London Review Panel (LRP) undertook a design review with GLA and City officers, and applicant, on 17 May 2024. This is considered to meet the requirements of Policy D4 of the London Plan.

Development layout

17. GLA officers are supportive of the public realm at street level and public uses within the building which could be a transformational addition to the area. The active frontages at lower levels of the buildings will contribute positively to the street environment.

18. The future management of the public spaces internally and externally, including the entrances themselves, should be carefully considered to create spaces that are welcoming, unique, and engaging with maximum hours of accessibility. The double-height glazed sliding entrance screens, if fully open as frequently as possible, will facilitate this.

19. Public seating has been included in Camomile Park and within the internal public spaces of the building to help facilitate spontaneous activation and create a place for informal meeting for the local community. The sense of identity could be strengthened by the inclusion of a sculpture or water features or commissioning of local artwork.

20. A sunlight study has been carried out to inform the planting proposals at lower levels beneath the projecting upper floors. The LPA should ensure that appropriate plant specification and maintenance is secured by condition to ensure that this key feature of the proposals thrives.

Tall buildings, scale and massing

21. The proposal includes a 46-storey building. This constitutes a tall building according to the LPA's local definition. The site is identified in the adopted and draft local plan as a site which is suitable for tall buildings, however, no heights have been specified. Therefore, this leads to a technical policy conflict with the locational requirements of Policy D9 (Part B) of the London Plan.

22. In terms of visual impacts, the overall height and massing of the scheme is well considered and works as a calm addition to the Eastern Cluster. The proposed materials and colour palette for the upper levels achieve a visual non-prominence which may help mitigate the sky gap reduction. The landscaped terraces at upper levels are less verdant than indicated at pre-application stage, which is supported. GLA officers are supportive of the amendments to the appearance of the crown to increase its significance.

23. With regards to the functional, environmental (including daylight, sunlight, glare, light, and wind impacts), and cumulative impacts, the LPA's assessment of these aspects will be reviewed at Stage 2.

Strategic views

24. The site falls within London View Management Framework (LVMF) Views 4A.1 Primrose Hill, 10A.1 City Hall to the White Tower, 15B.2 Waterloo Bridge and 25A.1 to 3 The Queen's Walk at City Hall. The design development process has achieved iterative improvements in the relationship of the building with the WHS in LVMF View 10.A.1, however potential impacts have been identified as discussed in the Heritage section below.

Internal quality

25. GLA officers are supportive of the internal layout to provide cultural and community uses in the building, which are the result of an engagement process to understand people's needs and aspirations. The inclusion of weather-protected non-transactional spaces that are accessible to all should be secured by the LPA. The office accommodation appears to be high quality and the multiple external terraces for office workers are strongly supported.

Architectural quality

26. The proposed materials and colour palette will provide the building with a high-quality appearance. Refinement of the visibility of the mid-level plant floors on the St Mary Axe elevation could be considered.

Public toilets

27. The proposed development includes a public toilet in line with Policy S6 of the London Plan. Management and maintenance details should be appropriately secured.

Free drinking water

28. The proposed development includes a water fountain in line with Policy D8 of the London Plan. Its provision and future management should be secured by condition.

Fire safety

29. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

30. Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with Policies D12 and D5 and all proposed measures should be secured by appropriate conditions.

Inclusive design

31. An inclusive design statement has been included in the application submission which identifies design and mitigation measures which should be secured to achieve an inclusive environment.

Heritage

32. Policy HC1 of the London Plan states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. As the site is in the setting of Tower of London World Heritage Site (WHS), London Plan Policy HC2 is relevant which states that development proposals in the setting of a WHS should not compromise the ability to appreciate their Outstanding Universal Value (OUV). Changes to setting can either have an adverse, neutral or beneficial impact on the ability to appreciate the site's OUV.

33. Beneath the existing buildings is a Scheduled Monument, London Wall: remains of Roman wall and bastion, Camomile Street, which forms part of the Roman wall around the northeast of the city. The site also contains a raised landscaped area, which is the remains of the graveyard of St Augustine Papey and St Mary Outwich.

34. The proposals include the full excavation, preservation in situ, presentation to public view and historical interpretation of a 5-metre stretch of the Roman wall. The proposals include appropriate hard and soft landscaping and historical interpretation of the on-site churchyard. This enhancement, once managed through conditions and secured through the S106 agreement would form welcomed heritage-related public benefits.

35. It is considered that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table of indirect (setting) impacts			
Designated heritage asset	**Category of harm**	**Extent of harm**	**View reference**
Tower of London WHS, Scheduled Monument, Grade I, II* and II listed buildings and conservation area	Less than substantial	Low to middle	Views 4, 5, 6, 7, 8a-c, 9, 10, 11, 12, 13, 14, 15
Botolph Street group: Church of St Botolph Aldgate, listed Grade I; Sir John Cass School, listed Grade II*;	Less than substantial	Very low	Views 17, 18, 26
Church of St Helen, listed Grade I;	Less than substantial	Very low	View 22
Lime Street group: Church of St Mary Undershaft, listed Grade I; Lloyds Building, listed Grade I;	Less than substantial	Low	View 21
Bank group: The Royal Exchange, listed Grade I; 13 Bishopsgate, listed Grade I; Numbers 51-53 Threadneedle Street, listed Grade II*.	Less than substantial	Very low	View 3

36. In the view from the north bastion of Tower Bridge (View 8b, which is also LVMF View 10A.1) the angle of view shows a closing of the sky gap between the White Tower and the Eastern Cluster, of which the proposed building forms a part. In this view, the height of the proposal is now equivalent to the shoulder height of the Salesforce Tower to the west, and the eastern edge of the proposed development follows the edge line of the Pan Pacific Hotel. In this view an area of open sky will be obscured by the proposed development. It is also noted that the building will be closer to the viewer than either the Salesforce Tower or the Pan Pacific Hotel. The closing of the gap is considered to cause less than substantial harm at a low to middle extent to the setting of the Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the Outstanding Universal Value of the Tower of London.

37. As the proposal is considered to result in a very low to middle level of less than substantial harm to heritage assets, the proposed development is therefore contrary to Policy HC1 and HC2 of the London Plan. Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm

should be attributed considerable importance and weight and weighed against the public benefits of the proposal.

38. GLA officers acknowledge that the proposal would deliver public benefits such as the delivery of new office space within the CAZ, publicly accessible cultural and community floor space, and new public realm improvements in addition to the heritage benefits associated with the Roman Wall. GLA officers will report at Stage 2, following a full assessment of the heritage impacts of the proposals by the City of London Corporation and once these public benefits have been secured by the Corporation to ensure that full weight can be given to these public benefits, to outweigh any harm identified.

Transport

Transport assessment

39. The Transport Assessment (TA) generally follows TfL guidance and includes an Active Travel Zone (ATZ) assessment including a night walkaround in alignment with the Women's Night Safety Charter, the Mayor's Violence Against Women and Girls Strategy, and Policy T4 Part B of the London Plan.

40. The LPA should consider securing highway works in kind or S106 contributions to their own relevant projects based on the outputs of the day and night ATZ assessments.

41. Measures should be proposed to ensure the public realm at and within the boundary of the site is always well lit and overlooked to maximise safety, including during any pedestrian diversions or gantries needed for construction.

42. Further contribution requests and comments on technical analysis elsewhere in the TA are outlined in detail below.

Public transport impacts

43. Distributional analysis of expected trips in terms of which local National Rail and London Underground (LU) stations might be used by visitors to and from the development has been provided; however, this does not split expected inward and onward travel by directions, platforms or lines as requested at pre-application stage.

44. The proposal meets TfL's strategic modelling threshold. As such, the TA should include directional analysis for buses, National Rail and London Overground (OU) / LU trips (including line loadings expected from the proposal).

45. The applicant is therefore advised to further engage with TfL to discuss and agree on the scope of modelling requirements through a follow up strategic modelling meeting.

46. Further public transport capacity modelling or equivalent technical analysis approved in principle by TfL is necessary to fully demonstrate compliance with Policy T4 Part F of the London Plan. This should be addressed prior to Stage 2.

47. Standard conditions are also requested for LU infrastructure protection and the applicant is strongly recommended to engage further with LU directly to ascertain the exact requirements based on the likely impact of the development to sub-surface LU infrastructure before, during and after its construction.

Highway impacts

48. The proposal for a minor relocation of the on-highway bus stands on Houndsditch to accommodate a new pedestrian route crossing to follow desire lines may be supported. Further clarification is required for bus standing at least equivalent to the current capacity, including driver and other associated facilities that would remain in in any new future highway layout. Swept paths for vehicles entering the proposed disabled parking and servicing area from the public highway must be provided.

49. TfL has requested a distribution of forecast pedestrian and cycle trips to determine the impact on their A10 corridor scheme and inform any mitigation. This is necessary to enable viable and proportionate costing of any S106 contribution to that scheme, pooled with other local committed developments in the vicinity.

50. Subject to further negotiation and the outcome of pedestrian distribution analysis once it has been provided, TfL may also request a contribution to their emerging TLRN A10 corridor scheme. This would be used to deliver strategic highway improvements at the Bishopsgate/Camomile Street junction. The sum requested would be proportionate to contributions recently secured from other significant developments in the City Cluster such as 55 Bishopsgate.

51. If preferable to the applicant, suitable mitigation works for the A10 could also be finalised through further modelling and design work prior to commencement and implemented through a S278 agreement. The S106 agreement would then need to specify an agreed scope of S278 works to be subsequently designed, validated and delivered by the applicant, including all technical assurance, road safety audits and traffic modelling if requested, with all necessary auditing.

Car parking

52. The proposed car-free nature of the scheme except for two disabled parking spaces is welcomed and aligns with Policy T6 of the London Plan. This should be secured by condition.

53. It is understood that the adjacent servicing area may be used for open space / retail during daytime, therefore consideration should be given ensuring disabled car users would not conflict with other visitors at the proposed ground floor open space.

Cycling and cycle hire

54. The proposed cycle access from Houndsditch is acceptable but provision of an additional alternative access point and route in from St Mary Axe should be considered.

55. The proposed mix of cycle parking is acceptable in principle, despite an under provision of 27 visitor spaces. The TA notes these spaces are required by the London Plan but not proposed and has offered to fund their creation off-site through a S106 obligation.

56. Under provision of cycle parking spaces against London Plan standards can only be supported subject to agreement by the applicant of significant financial contributions to the local London Wall highway scheme, which will improve surrounding highway conditions for cyclists in line with Policy T5 of the London Plan, and to free Cycle Hire memberships for initial occupants of the development.

57. The outline Cycle Promotion Plan submitted instead of a Travel Plan is broadly acceptable. However, S106 contributions toward its monitoring and £200,000 for free TfL Cycle Hire memberships to be offered to site users at first occupation and within the following 5 years should also be secured. The applicant should engage directly with TfL on this matter.

58. The applicant should ensure the design of all cycle parking accords with the with the London Cycle Design Standards (LCDS) as also set out in Policy T5. The provision of cargo bike spaces should be considered given the anticipated demand for the future. Details on the space of and location of the cycle parking should be provided prior to Stage 2.

Deliveries and servicing

59. Servicing access is proposed from Houndsditch using vehicle lifts which would be able to accommodate vehicles up to 7.5T panel van in size. The access location and effective vehicle size limit are acceptable in principle in line with Policy T7 of the London Plan. Robust measures and facilities to enable and increase the number of deliveries by cargo bike should feature in the proposals in both the TA and the outline Delivery and Servicing and Cycle Promotion Plans.

60. Concerns remain in relation to lifts, which may be subject to potential failure and associated impacts on the surrounding road network. In line with similar developments recently consented nearby, it is recommended to restrict delivery and servicing by motor vehicles including motorcycles by condition to between 11PM and 6AM only on weekdays. This is appropriate to support Part G of Policy T7 which highlights that developments should be designed and managed to receive deliveries. At present, restrictions are proposed from 7am -10am, 12pm – 2pm and 4pm – 7pm only.

61. The inclusion in the submitted outline Delivery and Servicing Plan of proposals to use an off-site freight consolidation centre and maximise the use river freight,

cargo bikes and available local ‘last mile’ logistics hubs are welcomed. However, as stated above, to support those aspirations, stringent restrictions on daytime deliveries by motorised modes and provision of specific on-site facilities for cargo bikes, including at the main entrance, must also be proposed and appropriately secured.

62. Any waiting areas on the public highway, even expected to be used only for infrequent overspill loading or in emergencies, must be agreed in advance with TfL and the LPA prior to Stage 2, and secured via S106 and S278.

63. Along with other requested further information and obligations, this is essential to prevent any unacceptable impact on the existing bus stand directly to the north of the site in accordance with Policies T3 and T4 of the London Plan.

Construction logistics

64. The submitted outline Construction Logistics Plan (CLP) is broadly acceptable in principle in line with Policy T7.

65. A very large number of vehicles are expected including over 60 HGVs per day during the busiest month of the overall construction programme. Access routes to and from the site include key junctions of the TLRN in close proximity, which are also part of TfL's A10 corridor walking, cycling and highway safety improvement scheme. TfL works nearby may coincide with construction access to support implementation of the development.

66. As such the CLP itself may require further future design assurance, traffic modelling and S278 highway works on both local highway and the TLRN, which should be referenced in any planning decision and secured by condition in the S106 agreement.

Environment and sustainable infrastructure

Energy strategy

67. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

68. An energy statement has been submitted with the application. The energy statement does not yet comply with Policies SI2, SI3 and SI4 of the London Plan. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the LPA and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

    Be Lean – further evidencing of energy efficiency measures/modelling techniques for the non-domestic element;

Be Clean – demonstration that the number of energy centres has been minimised;
Be Green – demonstration that renewable energy has been maximised, including more detailed roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

Carbon savings

69. The development is estimated to achieve a 33% reduction in CO2 emissions compared to 2021 Building Regulations.

70. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. This is unacceptable and the carbon savings must be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the LPA's carbon offset price. The draft S106 agreement should be submitted when available to evidence the agreement with the LPA.

Whole life-cycle carbon

71. In accordance with Policy SI2 of the London Plan, the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

72. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with Policy SI2. Further information is required on the operational modelling methodology, cost per building element, GGBS availability, material quantity, assumptions and end of life scenarios, and GWP potential.

73. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website[2].

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance

Circular economy

74. The London Plan requires development proposals to integrate circular economy principles as part of the design process, and referable applications must submit a Circular Economy Statement.

75. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with Policy SI7. The applicant should provide a pre-demolition audit, end-of-life strategy, site waste / resource management plan, cut and fill calculations and / or excavated materials options assessment, circular economy workshop or meeting notes, and reused or recycled content calculations.

76. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[3].

Urban greening and biodiversity

77. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.57 which exceeds the target score of 0.3. The applicant should explore additional opportunities to increase the urban greening and the LPA should secure all greening measures to ensure the target is met.

78. The applicant has set out that there would be a biodiversity net gain of 6,943.64% which complies with the London Plan. Measures to secure the biodiversity net gain should be secured by the LPA.

Sustainable drainage and flood risk

79. The flood risk assessment (FRA) provided generally complies with Policy SI.12 of the London Plan. Direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk.

80. The sustainable urban drainage strategy does not comply with Policy SI.13 of the London Plan. Whilst the FRA states that runoff will be restricted to 0.93 l/s (QBAR greenfield rate), the table in Section 5.2.1 of the drainage strategy indicates a proposed runoff rate of 2.9 l/s. This inconsistency should be clarified to ensure the design aligns with the agreed drainage parameters. The applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits. The LPA should also include in the SuDS maintenance arrangements the assessment of exceedance flood flow routes, the use of any pump discharges is appropriate, and the completed LPA version of the London Sustainable Drainage Proforma.

81. The water efficiency measures generally meet the requirements of Policy SI.5 of the London Plan.

[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

Air quality

82. The applicant should clarify whether the site is located within an air quality focus area as the submitted reports conflict with the maps. The applicant has provided an air quality assessment, and it was determined the scheme would be air quality neutral. Further information is required on the air quality positive assessment. The LPA should identify all appropriate mitigation and appropriately secure these as part of any future planning permission.

Local planning authority's position

83. City of London Corporation planning officers are currently assessing the application. In due course the City of London Corporation will formally consider the application at a planning committee meeting.

Legal considerations

84. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the City of London Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the City of London Corporation under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

85. There are no financial considerations at this stage.

Conclusion

86. London Plan policies on land use principles, urban design, heritage, transport, sustainability, and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

    Land use principles: The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations.

Urban design and heritage: The proposed building is of high architectural quality and will deliver new public realm, however the final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.

Transport: Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics.

Environment and sustainable infrastructure: Further information is required for the energy strategy, whole life cycle carbon, circular economy, green infrastructure, water and air quality.

For further information, contact GLA Planning Unit (Development Management Team):
Zeb McInnes, Senior Strategic Planner (case officer)
email: [redacted]
Matt Christie Team Leader – Development Management
email: [redacted]
Allison Flight, Deputy Head of Development Management
email: [redacted]
John Finlayson, Head of Development Management
email: [redacted]
Lucinda Turner, Assistant Director of Planning
email: [redacted]

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

City of London Planning Department

Submission by email:
PLNComments@cityoflondon.gov.uk

Dalia Alghoul
Town planning Technician
1 Stratford Place,
London
E15 1AZ

Date: 9 May 2025

NR Reference:
TPA/3PT/25/530

Network Rail Consultation Response

Reference: 25/00223/FULEIA
Location: 63 St Mary Axe London EC3A 8AA.

Dear Sir/Madam,

Thank you for consulting Network Rail (NR) regarding the planning application reference: 25/00223/FULEIA. Network Rail would like to be contacted for future applications in the vicinity of Liverpool Street Station.

Liverpool Street Station Capacity Considerations

In reviewing the application, it is important to highlight that the forecast additional growth in rail demand at Liverpool Street Station (LST), considered on an individual development basis, can be accommodated by the available and planned *on-train* capacity.

However, NR remain concerned about the *cumulative* impact of multiple consented and proposed major developments in the immediate vicinity of LST — particularly in relation to medium-term pedestrian flow and station concourse capacity. At present, there is no committed or funded scheme to address this growing 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 development in the area.

NR would therefore encourage the City to continue to consider potential allocation of its Community Infrastructure Levy (CIL) funds in addressing the collective infrastructure challenges created by cumulative growth.

I trust the above clearly sets out 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

From: [redacted]
To:
Subject: Re: 63 St Mary Axe - Planning Application - Re-Consultation
Date: 09 May 2025 13:42:14
Attachments: image.png

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the additional information in relation to the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the additional information.

Therefore, our previous safeguarding comments remain valid and should still be consider at all future stages of this development.

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
[redacted]
WEBSITE [redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

CYRRUS BRIGHTON CITY AIRPORT

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:58
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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From: [redacted]
To:
Subject: LPA Reference: 25/00223/FULEIA Standing Advice Response
Date: 09 May 2025 16:42:35

THIS IS AN EXTERNAL EMAIL

LPA Reference: 25/00223/FULEIA

ATE Reference: ATE/25/00441/FULL

Site Address: 63 ST MARY AXE, LONDON, EC3A 8AA

Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:
https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000003Dxa1IAC;2a75d692f626b35aec29bae6a83dfa3d:ref]

LPA Ref: 25/00223/FULEIA

London City Airport Ref: 2025/LCY/122

Date: 12/05/2025

Dear Georgia McBirney,

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	25/00223/FULEIA
Proposal	Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. AMENDED APPLPICATION
Location	63 St Mary Axe London EC3A 8AA
Borough	City of London
Case Officer	Georgia McBirney

London City Airport's response must change to an objection unless the condition is applied to this planning permission.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of

obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also make the following observations:

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

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.

Kind regards,

Simon Vince
On behalf of London City Airport

From: [redacted]
To:
Subject: RE: 63 St Mary Axe - Planning Application - Re-Consultation [SG37805]
Date: 13 May 2025 12:42:57
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37805

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: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team
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If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

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

25/1538/K
25/00223/FULEIA
15 May 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:	**63 St Mary Axe, London, EC3A 8AA**
Applicant:	**C/O Agent**
Proposal:	**An application has been received for: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**
Drawings	

I refer to your letter dated 09 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: [redacted]
To:
Cc:
Subject: FW: 63 St Mary Axe - Planning Application - Re-Consultation
Date: 16 May 2025 09:44:00
Attachments: 25-00223-FULEIA - Consultee Re-consultation Letter.rtf
63 St Mary Axe Archaeology final.pdf

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Thank you for reconsulting me on this application. The additional information submitted does not affect my previous advice which I have attached

Regards

Helen

Historic England

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Historic England

Ms Georgia McBirney
Planning Administration
Environment Department
City of London Corporation

Your Ref: 25/00223/FULEIA
Our Ref: 231485

Contact: Helen Hawkins
[redacted]

08 April 2025

Dear Ms McBirney,

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

63 St Mary Axe London EC3A 8AA
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 March 2025.

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.

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

GLAAS advises the City of London on their non-designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter.

The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable.

Significance

The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings –this is explained further in the Development Advice letter.

At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street.

Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period.

An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial

ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset –the burial ground –into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'.

Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset.

Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well-preserved Roman deposits were encountered. This is a significant omission.

Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it.

Impact

Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains.

The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully compensated for by the proposed new park design for the area.

The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new

development. The Scoping response also requested that the results of the proposed pre-determination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided.

The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works.

The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Policy

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 and that a field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

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

The City Local Plan Policy DM 12.4 requires that 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 and that schemes preserve, protect, safeguard and enhance archaeological monuments, remains …where appropriate. The supporting text says "The City Corporation will refuse schemes which do not make any provision for the incorporation, safeguarding or preservation in situ of nationally or locally important monuments or remains, or which would adversely affect those monuments or

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
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remains".

If preservation is not achievable then 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.

Conclusion and Recommendations

The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed.

The development proposal as submitted would result in the total loss of this non-designated heritage asset.

We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision.

Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken.

If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

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

This response relates solely to archaeological considerations.

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
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Georgia McBirney
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/25/00489
Your ref: 25/00223/FULEIA

Enquiries to: Robin Bennett
Tel:
Email: [redacted]

16 May, 2025

Dear Georgia McBirney,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location 63 St Mary Axe London EC3A 8AA
Proposal Observations requested by City of London in relation to Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed 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 The application proposes a development which would provide c85,000sqm Grade A office floorspace. The London Borough of Tower Hamlets (LBTH) acknowledges that this has the potential to make a significant contribution towards the growth in office development, and consequent long term economic and employment growth, that is sough in the City of London's Local Plan 2015 and the emerging City Plan 2040.

In considering the effect of the proposal on land within LBTH, particular regard has

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

been had to the Townscape and Visual Impact Assessment and Heritage Impact Assessment submitted with the application.
In the majority of views the development does not raise significant concerns, as it is either fully or partially obscured by existing buildings, appears at a sufficient distance from the White Tower to avoid a meaningful impact, or is read as part of a wider backdrop of tall buildings. LVMF View 10A.1 does, however, warrant particular attention due to the increased visual proximity of the development to the White Tower and its potential effect on the composition of the view.

From this viewpoint, the cluster of tall buildings in the City appears much closer to the White Tower, which is the central feature of the WHS, with only a narrow gap separating them. The LVMF guidance highlights that the appreciation of the Tower of London's detailed architecture and historic layering is enhanced by the surrounding free sky space.

The proposed development would be visible in this view, positioned in front of existing tall buildings, including the Salesforce Tower (formerly Heron Tower). Although it would retain the final part of the gap between the cluster and the White Tower, its presence would intensify the visual dominance of built form and contribute to the crowding of the White Tower's immediate setting. The development would also appear taller than the current building at the cluster's edge, reducing the sky space between the cluster and the White Tower and competing visually with the tower's corner turrets. While the building leans away from the White Tower, mitigating some sky space loss, this design also introduces a more striking and potentially distracting form, where a calmer appearance might better respect the WHS setting.

Overall, LBTH consider that the proposed development would result in only limited harm to the WHS, taking into account the number and variety of views in which they are experienced together. However, in the context of viewing location 10A.1, the proposed development is considered to cause some harm to the setting of the WHS. The decision maker should carefully consider this harm and weight it against the public benefits of the scheme.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

Georgia McBirney
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/25/00859
Your ref: 25/00223/FULEIA

Enquiries to: Robin Bennett
Tel:
Email: [redacted]

16 May, 2025

Dear Georgia McBirney,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	63 St Mary Axe London EC3A 8AA
Proposal	Observations requested by City of London for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118. RE-CONSULTATION due to the submission of additional information.

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 The London Borough of Tower Hamlets (LBTH) has considered the additional information that is subject to the re-consultation. LBTH do not wish to add to the comments in their letter dated 16 May 2025 under LBTH ref:PA/25/00489, and ask

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

that these are taken into account by the City of London in the determination of the application.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

19th May 2025

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Applicant:

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2025/00950/OBS**

Registered on: **2nd April 2025**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

63 St Mary Axe London EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes
E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St
Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place
Department: Joanne Woodward



Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

creating a better place
for people and wildlife

Environment Agency

Georgia McBirney
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/137997/02
Your ref: 25/00223/FULEIA

Date: 21 May 2025

Dear Georgia

63 St Mary Axe, London, EC3A 8AA.

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Thank you for re-consulting us on the above application on 9 May 2025.

Environment Agency Position

We continue to have **no objections** to this application. However, we would like to draw your attention, and that of the applicant, to the following advisory comments.

Advice to Local Planning Authority and applicant:

Development in close proximity to activity regulated by an Environment Agency permit advisory
New developments within 75m metres of Medium combustion plant (MCP) could result in impacts including the nearby community being exposed to fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new

development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations (EPR) require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

Advice to Local Planning Authority

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites
Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Use of Sustainable Drainage Systems (SuDS)
Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

the CIRIA C697 document SuDS manual
HR Wallingford SR 666 Use of SuDS in high density developments
CIRIA C635 Designing for exceedance in urban drainage – good practice
the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent'

standard for water consumption (category ‘WAT 01’), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

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.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely

Demitry Lyons
Sustainable Places Planning Advisor

[redacted]

From: [redacted]
To:
Subject: RE: 63 St Mary Axe - Planning Application - Re-Consultation
Date: 22 May 2025 13:51:46
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Good afternoon,

25/00223/FULEIA
Location: **63 St Mary Axe London EC3A 8AA**
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground infrastructure.

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

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

a. Provide predicted short term and long-term ground movement effects of the works on LU structure or tunnels and in particular changes in stresses, changes in heave or settlement, distortion of the structure or tunnels due to required temporary and permanent works.
b. provide detailed design and Risk Assessment Method Statement (RAMS) for both temporary and permanent works associated with demolition, excavation and construction of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling.

Reason: To ensure that the development does not impact on existing London

Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Mitigating risk - while helping London develop.

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Friday, May 9, 2025 12:59 PM
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

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

From: SM-NE-Consultations (NE) <[redacted]>
Sent: 27 May 2025 18:20
To: PLN - Comments <[redacted]>
Subject: FAO. Georgia McBirney [Re: 63 St Mary Axe - Planning Application - Re-Consultation]

THIS IS AN EXTERNAL EMAIL

Please see below for Natural England's response to this consultation.

Dear Ms McBirney

Application Ref: 25/00223/FULEIA
Our Ref: 512637

Thank you for your consultation.

Natural England has previously commented on this proposal in our letter dated 22 April 2025 [NE Ref: 507023] and enclosed for your convenience.

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 sincerely

Paul Scott

Natural England
Consultation Service
County Hall, Spetchley Road, Worcester, WR5 2NP.

consultations@naturalengland.org.uk | www.gov.uk/natural-england



We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

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 while securing good results for the natural environment.

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team
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Date: 22 April 2025
Our ref: 507023
Your ref: 25/00223/FULEIA

FAO Georgia McBirney
City of London Planning

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Madam,

Planning consultation: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis);the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St. Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development
Location: 63 St Mary Axe London EC3A 8AA

Thank you for your consultation on the above dated 17 April 2025 which was received by Natural England on 17 April 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

Richard Gibson
Consultations Team

From: [redacted]
To:
Cc:
Subject: FW: 25/00223/FULEIA 63 St Mary Axe - Re-Consultation
Date: 30 May 2025 17:25:35
Attachments: image001.png

Hello,

Could the email below please be logged and uploaded as consultation response from Historic England on 25/00223/FULEIA –63 St Mary Axe.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

Advance Leave Notice:
From the 11th June returning on 23rd June
From the 15th September returning on 22nd September

From: Bowring, Alexander <[redacted]
Sent: 29 May 2025 15:33
To: McBirney, Georgia <[redacted]
Cc: Reade, Chris <[redacted]>
Subject: 25/00223/FULEIA 63 St Mary Axe - Re-Consultation

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Thank you for reconsulting Historic England on this application.

A revised Heritage Impact Assessment and a video of the 3D model of the proposed development illustrating the kinetic experience of Tower Bridge have been submitted.

We continue to refer you to advice letter of 16 April 2025 –the additional information does not overcome the concerns that we have previously set out. The video in particular illustrates the harmful impact of the proposals on the Outstanding Universal Value of the Tower of London World Heritage Site that we have described.

Historic England continues to object to the application on heritage grounds. However, we would welcome further discussion with the applicants and your authority about possible amendments to the proposals which would reduce the harmful impact on the important heritage assets previously discussed, including the World Heritage Site, the scheduled monument and the burial ground.

Please contact Chris and I if we can be of any further assistance.

Kind regards

Alex Bowring
Inspector of Historic Buildings and Areas
London and South East Region
Historic England
Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Email: Alexander.Bowring@HistoricEngland.org.uk

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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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: 25/03284/OBS

Please reply to: Nikki Mitchell
Tel No: [redacted]
Email:

Georgia McBirney
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

29 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.: 25/03284/OBS **Application Date:**

Date Received: 09.05.2025 **Date Amended:** 09.05.2025

Plan Nos: Letter from City of London dated 9 May 2025.

Address: 63 St Mary's Axe, City Of London, London, EC3A 8AA

Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

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.

Crystal Mark
Clarity approved by Plain English Campaign

Your Ref:
Our Ref: 25/01599/OBS

City Of London

PO Box 270
Guildhall
London
EC2P 2EJ

4th June 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: 25/01599/OBS Date of Application: 09.05.2025 Date of Decision 04.06.2025

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: 'Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.', at: 63 St Mary Axe, London, EC3A 8AA. [RE-CONSULTATION due to the submission of additional information.] Reference number: 25/00223/FULEIA

Approved Plans

Consultation letter from City of London dated 15 May 2025

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Conditions

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 4th June 2025

London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

6th June 2025

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Applicant:

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2025/01302/OBS**

Registered on: **12th May 2025**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

63 St Mary Axe London EC3A 8AA

25/00223/FULEIA - Reconsultation - Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place
Department: Joanne Woodward

[redacted]

Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

From: [redacted]
To:
Cc:
Subject: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA) Re-consultation
Date: 06 June 2025 13:39:34

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for letting us know of the re-consultation of this scheme. Following review, we offer no further comment on the scheme.

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

I may send email outside normal working hours from time to time.
Please be assured I do not expect a reply outside normal working hours.

For our COVID-19 Business Continuity arrangements please click here

Cambridge Office:
Office 5, Unit 8; 23-25 Gwydir Street
Cambridge CB1 2LG
Tel: 01223 472237

London Office:
The Surveyor's Office, The Chapter House, St Paul's Churchyard
London EC4M 8AD
Tel: 020 7246 8341

Visit our website: caroe.com

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From: [redacted]
To:
Subject: 63 St Mary Axe, London, EC3A 8AA. Application no. 25/00223/FULEIA
Date: 10 June 2025 10:22:17
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

FAO Georgia McBirney, Planning Case Officer

Dear Georgia,

Thank you for re-consulting the Council for British Archaeology on this revised application.

We refer you to our previous response, dated 16 April 2025. In this we advised that a detailed pre-determination archaeological evaluation of the site is required to understand the survival and significance of the surviving below-ground archaeology, in order to understand the potential impacts of the scheme. In the absence of this, there is insufficient information to meet the requirements of para. 207 of the NPPF or Policy HE2 of the City Plan 2040. There is potential for this application to cause substantial harm to a highly significant archaeological site spanning centuries; the level of harm caused and significance of the site cannot be understood without an expert on-site evaluation.

While the applicants have provided additional information on the above-ground impacts on the setting of nearby heritage assets, no archaeological assessment of the site has been undertaken, as previously recommended by the CBA and GLAAS.

As such, we maintain our previous objection to the scheme. If an archaeological evaluation of the site which permits an understanding of the probable surviving archaeology on site is not provided, we recommend that this application be refused.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

We would be grateful if these comments could be uploaded to the planning portal.

Kind Regards,
Dr Alison Edwards
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications –notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021.**

Alison Edwards
[she/her]
Listed Building Caseworker / JCNAS database coordinator

Please note my normal working days are Monday-Thursday

www.archaeologyuk.org
De Grey House | St Leonard's Place | York | YO1 7HE
01904 671417



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Click here for more information
Explore our Organisers Area here

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From: [redacted]
Sent: 17 June 2025 12:35
To: Grierson, John <[redacted]
Subject: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

17 June 2025

Our DTS Ref: 77421
Your Ref: 25/00223/FULEIA - revise response

Dear Sir/Madam,

Re: 63, ST MARY AXE, LONDON, EC3A 8AA

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

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Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Email: [redacted]

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From: lauren underwood [redacted]
Sent: 17 June 2025 15:04
To: Grierson, John [redacted]
Subject: RE: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Hi John,

That's correct, the supplementary comments heading should have nothing underneath. What came through from our system should look like the below:-

Dear Sir/Madam,

Re: 63, ST MARY AXE, LONDON, EC3A 8AA

Waste Comments:
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Supplementary Comments:

Yours faithfully,
Development Planning Department

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

I hope that helps

Lauren Underwood
Regional Development Manager (London)
Development Planning Team
Asset Management & Engineering
[redacted]
Maple Lodge Sewage Treatment Works, Denham Way, Rickmansworth, WD3 9SQ
Thames Water
It's everyone's water
Working schedule: Mon, Tues Fri 8am-5:30pm. Wed & Thurs 9:30am - 2:30pm

---

From: Grierson, John [redacted]
Sent: 17 June 2025 14:59
To: lauren underwood [redacted]
Subject: Fw: 3rd Party Planning Application - 25/00223/FULEIA - revise response

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Hi Lauren,

Just to clarify as the applicant has queried - there aren't supposed to be any additional supplementary comments as this section was blank on the response?

Kind regards,

John

John Grierson MRTPI | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
Email [redacted] | Mob [redacted] | Website: www.cityoflondon.gov.uk

RTPI Chartered Town Planner

Katie Stewart – Executive Director Environment



Any advice given in this email is provided in good faith and represents the informal opinion of an officer and is not necessarily that of the City of London Corporation.

From: Eleanor Hulm <[redacted]>
Sent: 17 June 2025 14:55
To: Grierson, John <[redacted]>
Cc: McBirney, Georgia <[redacted]>; Tastsoglou, Anna <[redacted]>
Subject: RE: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Hi John

Many thanks for the below.

Can I take it that there no objection from Thames Water and nothing further required at this stage prior to committee due to detail that can be conditioned?

It appears that a section is missing on supplementary comments?

Best
Eleanor

Eleanor Hulm
Senior Planner
mobile: [redacted]
e-mail: [redacted]
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: 020 7004 1700 website: www.dp9.co.uk

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From: Grierson, John <[redacted]>
Sent: 17 June 2025 12:37
To: Eleanor Hulm <[redacted]>
Cc: McBirney, Georgia <[redacted]>; Tastsoglou, Anna [redacted]
Subject: Fw: 3rd Party Planning Application - 25/00223/FULEIA - revise response

Hi Eleanor,

Please see below an updated response from TW.

Kind regards,

John

John Grierson MRTPI | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
Email [redacted] | Mob [redacted] | Website: www.cityoflondon.gov.uk

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Our DTS Ref: 77421
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Development Planning Department

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Maple Lodge STW,
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WD3 9SQ,
Email: devcon.team@thameswater.co.uk

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From: [redacted]
To:
Subject: 3rd Party Planning Application - 25/00223/FULEIA - revise response
Date: 20 June 2025 12:06:27

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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.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Email: [redacted]

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to [redacted]

Hackney Council
Planning Service
1 Hillman Street
London E8 1DY
www.hackney.gov.uk
Hackney
Reference:2025/0632

Mr Georgia McBirney
P O Box 270 Guildhall
London

EC2P 2EJ

24-03-2025

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application Number: 2025/0632

Site Address: 63 St Mary Axe, London, EC3A 8AA

Development Description: Notification from the City of London of application 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 1 Hillman Street, London, E8 1DY, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours sincerely

[redacted]

Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy

PLANNING DECISION NOTICE

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

Agent:

Applicant: Georgia McBirney

P O Box 270 Guildhall
London
EC2P 2EJ

Part 1- Particulars of the Application

Application No: 2025/0632

Date of Application: 17-03-2025

Date Validated: 18-03-2025

Application Type: Adjoining Borough Observations

Proposal: Notification from the City of London of application 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former

churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Location: 63 St Mary Axe, London, EC3A 8AA

Plan Numbers:

Part 2 – Particulars of Decision: **No Objection**

Date of Decision: 24-03-2025

Yours sincerely

[redacted]

Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy

From: [redacted]
To:
Subject: LPA Reference: 25/00223/FULEIA Standing Advice Response
Date: 25 March 2025 15:56:15

THIS IS AN EXTERNAL EMAIL

LPA Reference: 25/00223/FULEIA

ATE Reference: ATE/25/00441/FULL

Site Address: 63 ST MARY AXE, LONDON, EC3A 8AA

Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:
https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter **@activetraveleng**

Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000003Dxa1IAC;7bb557de2417b28eeb398d528fdc69f5:ref]

LONDON GATWICK

26 March 2025

Georgia McBirney
Environment Department
City of London
PO Box 270, Guildhall
London EC2P 2EJ

Dear Georgia

Re: Planning Application No: 25/00223/FULEIA – Demolition of existing buildings and the construction of a 45 storey building with associated works at 63, St Mary Axe, London

Our Ref: LGW5790

Thank you for your letter/email dated 17 March 2025, regarding the above-mentioned consultation.

The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. We therefore have no objection to this proposal in relation to Gatwick Airport.

Please note that the 'The Town & Country Planning (Safeguarded Aerodromes, Technical Sites & Military Explosives Storage Areas) Direction 2002', in Annex 2 under 'High Structures', requires the Local Planning Authority to notify the CAA in relation to any proposed buildings/structures at 91.4m (AGL) or above as soon as permission has been granted. The Safeguarding Circular can be found at Safeguarding aerodromes, technical sites and military explosives storage areas - GOV.UK

The contact email is AROps@caa.co.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: [redacted]

From: [redacted]
To: [redacted]
Subject: RE: Planning Application Consultation: 25/00223/FULEIA
Date: 28 March 2025 09:39:22
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

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA Crane notification | Civil Aviation Authority (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

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: 17 March 2025 11:42
To: CEI - Airport Safeguarding/BAA <[redacted]
Subject: Planning Application Consultation: 25/00223/FULEIA

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir/Madam

Please see attached consultation for 63 St Mary Axe London EC3A 8AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Georgia McBlenny
Environment Department
City of London

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Please note that Heathrow Airport Holdings Limited and its subsidiaries ("Heathrow") monitors incoming and outgoing mail for compliance with its Information Security policy. This includes scanning emails for computer viruses.

COMPANY PARTICULARS: For particulars of Heathrow companies, please visit http://www.heathrowairport.com/about-us. For information about Heathrow Airport, please visit www.heathrowairport.com

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: [redacted]
To:
Subject: RE: Planning Application Consultation: 25/00223/FULEIA [SG37805]
Date: 28 March 2025 11:03:02
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37805

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: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 17 March 2025 11:44
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: Planning Application Consultation: 25/00223/FULEIA

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 63 St Mary Axe London EC3A 8AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Georgia McBirney
Environment Department
City of London
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Website: http://www.cityoflondon.gov.uk

If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15

LPA Ref: 25/00223/FULEIA

London City Airport Ref: 2025/LCY/078

Date: 28/03/2025

Dear Georgia McBirney,

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	25/00223/FULEIA
Proposal	Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.
Location	63 St Mary Axe London EC3A 8AA
Borough	City of London
Case Officer	Georgia McBirney

London City Airport's response must change to an objection unless the condition is applied to this planning permission.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of

obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also make the following observations:

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

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.

Kind regards,

Simon Vince
On behalf of London City Airport

From:	Haringey Planning Services
To:	PLN - Comments
Subject:	Decision Notice - HGY/2025/0700
Date:	31 March 2025 16:15:04

THIS IS AN EXTERNAL EMAIL

Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) Order 2015

Application No:	HGY/2025/0700
Proposal:	Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118 (Observations to City Of London - their planning reference 25/00223/FULEIA)
Site Address:	63 St Mary Axe, London, EC3A 8AA

Dear Sir/Madam,

I am writing to inform you that Haringey Council raises NO OBJECTION to the above request for observations.

Thank you,

Head of Development Management and Planning Enforcement

Planning Service

[ref:a0iTu00000129ZhIAI;63cdcff98d7adcc6315f8396b074883c:ref]

Planning | Placemaking and Housing | Haringey Council

Alexandra House (5th Floor), 10 Station Road, London, N22 7TR
www.haringey.gov.uk/planning-and-building-control/planning

Planning and Place
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place
Amanda Reid

THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Georgia McBirney
City of London
Environment Department
PO Box 270 Guildhall
LONDON
EC2P 2EJ

Date: 02/04/2025
My Ref: OB/25/01627
25/00223/FULEIA

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

63 St Mary Axe London EC3A 8AA

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

SCHEDULE

Development:	This Council is asked for its observations on an application submitted to the City of London for: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118
Site Address:	**63 St Mary Axe London EC3A 8AA**
RBKC Drawing Nos:	OB/25/01627
Applicant's Drawing Nos:	available on City of London website at

https://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SRJ3RVFHIH400

Application Dated: 17/03/2025

Application Completed: 17/03/2025

FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S) ATTACHED OVERLEAF

CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION

INFORMATIVE(S)

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see Advice for Builders on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at **http://www.rbkc.gov.uk/OB/25/01627 .** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid
Director of Planning and Place

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/297201 **.** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Tel: [redacted]

City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Directorate of Place and Growth
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

25/1009/K
Your Ref: 25/00223/FULEIA
03 April 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:	**63 St Mary Axe London EC3A 8AA**
Applicant:	**C/O Agent**
Proposal:	**Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.** **This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**
Drawings	Consultation Letters

I refer to your letter dated 17 March 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

SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0018

Date of issue of this decision: 07/04/2025

LBS Reg. No.: 25/OB/0018	**Date of Issue of Decision:** 07/04/2025
Your Ref No.:	

Applicant City Of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with
basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.'

At 63 St Mary Axe London EC3A 8AA

In accordance with your letter received on 18 March 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Historic England

Ms Georgia McBirney
Planning Administration
Environment Department
City of London Corporation

Your Ref: 25/00223/FULEIA
Our Ref: 231485

Contact: Helen Hawkins
[redacted]

08 April 2025

Dear Ms McBirney,

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

63 St Mary Axe London EC3A 8AA
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 March 2025.

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.

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

GLAAS advises the City of London on their non-designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter.

The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable.

Significance

The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings –this is explained further in the Development Advice letter.

At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street.

Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period.

An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial

ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset –the burial ground –into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'.

Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset.

Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well-preserved Roman deposits were encountered. This is a significant omission.

Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it.

Impact

Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains.

The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully compensated for by the proposed new park design for the area.

The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new

development. The Scoping response also requested that the results of the proposed pre-determination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided.

The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works.

The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Policy

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 and that a field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

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

The City Local Plan Policy DM 12.4 requires that 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 and that schemes preserve, protect, safeguard and enhance archaeological monuments, remains …where appropriate. The supporting text says "The City Corporation will refuse schemes which do not make any provision for the incorporation, safeguarding or preservation in situ of nationally or locally important monuments or remains, or which would adversely affect those monuments or

remains".

If preservation is not achievable then 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.

Conclusion and Recommendations

The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed.

The development proposal as submitted would result in the total loss of this non-designated heritage asset.

We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision.

Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken.

If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

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

This response relates solely to archaeological considerations.

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
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Correspondence or information which you send us may therefore become publicly available.

Your Ref:
Our Ref: 25/00873/OBS

Lambeth

Georgia McBirney

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

11th April 2025

RE: REQUEST FOR OBSERVATIONS

Dear Georgia McBirney

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: 25/00873/OBS Date of Application: 18.03.2025 Date of Decision 11.04.2025

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 Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development at 63 St Mary Axe London EC3A 8AA.

Approved Plans

Consultation letter from City of London dated 17 March 2025

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Conditions

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 11th April 2025

creating a better place
for people and wildlife

Environment Agency

Georgia McBirney
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/137997/01
Your ref: 25/00223/FULEIA

Date: 15 April 2025

Dear Georgia

63 St Mary Axe, London, EC3A 8AA.

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Thank you for consulting us on the above application on 17 March 2025. Please accept our apologies for the delay in getting back to you.

Environment Agency Position
Whilst we have **no objections** to this application, we would like to draw your and the applicant's attention to the following advisory comments.

Advice to Local Planning Authority and applicant

Development in close proximity to activity regulated by an Environment Agency permit advisory.
New developments within 75m metres of Medium combustion plant (MCP) could result in impacts including the nearby community being exposed to fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations (EPR) require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

Advice to Local Planning Authority

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites.
Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Use of Sustainable Drainage Systems (SuDS)
Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS

manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

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.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Demitry Lyons
Sustainable Places Planning Advisor

Email: hnlsustainableplaces@environment-agency.gov.uk
Telephone: 020 7714 0578

From: [redacted]
To:
Subject: 63 St Mary Axe, London, EC3A 8AA. Application no. 25/00223/FULEIA
Date: 16 April 2025 14:09:40
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png

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THIS IS AN EXTERNAL EMAIL

FAO Georgia McBirney

Dear Georgia,

Thank you for notifying the Council for British Archaeology of the above application.

We do not wish to make detailed comments on existing proposals at this stage, but would like to express our serious concerns over the applicant's failure to follow the clear advice offered by GLAAS at a pre-application stage.

The application site is highly archaeologically significant, with remains from the Roman period and a medieval and post-medieval burial ground. Archaeological evidence about the city's past is a finite resource of high evidential value, and this site is extremely rare in that there are no records of modern development which would have disturbed the surviving archaeological remains. The proposed new development on this site would cause permanent and substantial harm to this archaeology. This harm cannot be justified by an archaeological mitigation strategy (under para. 218 of the NPPF).

The application does not demonstrate an adequate understanding of the significance or nature of the archaeological remains on the site, as required by para. 207. The probable presence of undisturbed Roman archaeology is not acknowledged and insufficient assessment work has been done to enable an understanding of the site and the survival of archaeological remains, against the previous advice offered by GLAAS.

The CBA do not consider that this application meets the requirements of para 207 of the NPPF or Policy HE2 of the City Plan 2040. Unless a detailed archaeological evaluation is undertaken and a detailed scheme of mitigation works is agreed with GLAAS, we recommend that this application be **refused** due to insufficient information and the substantial harm which would be caused to the unique archaeology of the site.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

We would be grateful if these comments could be uploaded to the planning portal.

Kind Regards,
Dr Alison Edwards
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications –notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.

Alison Edwards
[she/her]
Listed Building Caseworker / JCNAS database coordinator

Please note my normal working days are Monday-Thursday

www.archaeologyuk.org
De Grey House | St Leonard's Place | York | YO1 7HE
01904 671417



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Historic England

Ms Georgia McBirney
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01590237

16 April 2025

Dear Ms McBirney

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

63 ST MARY AXE LONDON EC3A 8AA
Application No. 25/00223/FULEIA

Thank you for your letter of 17 March 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

These proposals would harm attributes of the Tower of London World Heritage Site's Outstanding Universal Value and consequently harm its integrity. This weighs very heavily against the application.

The proposal includes revealing and conserving the London Wall scheduled monument. This would represent an enhancement of its significance and the ability to appreciate it. However, we are concerned that removing the associated, non-designated burial ground (which forms part of the London Wall's setting that is likely to contribute highly to its significance) may cause a level of harm that would not be outweighed by the heritage benefit of showcasing the wall, nor would it be capable of outweighing the harm to the World Heritage Site.

The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich. The Greater London Archaeological Advisory Service (GLAAS) has advised that further information is required to fully assess the nature of the harm which may be caused by the development.

Our advice does not preclude the redevelopment of the site, but these considerable heritage impacts together indicate that the proposals represent neither sustainable

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development as required by national planning policy, nor the optimum capacity for the site, as required by the London Plan's design-led approach. It would be possible to redevelop the site without causing the harm we have described and we encourage that this should instead be pursued. We recommend that planning permission for the current proposals should therefore not be granted.

Historic England Advice

Significance of heritage most affected by the proposed development

There are three heritage assets that we consider would be most affected by the proposed development. The Tower of London World Heritage Site and The London Wall scheduled monument are the subject of this advice letter. An assessment of the total loss of the burial ground on the site, a non-designated heritage asset, is provided by the Greater London Archaeological Advisory Service in a separate consultation response, but we note that impact here too, in considering the proposal in the round.

a) The Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016), convey its Outstanding Universal Value. They reflect the Tower as a model example of the development of a medieval fortress palace and its role as the site of many significant episodes of European history. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The Statement of OUV (SOUV) adopted by the World Heritage Committee, in the section relating to integrity, notes that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.'

The physical relationship of the Tower with the City as viewed from the river is central to understanding its Outstanding Universal Value (OUV). The view from the north bastion of Tower Bridge towards the Tower of London, View 10A.1 in the London View Management Framework (LVMF), has become historically important as a long-established picture post card view. It forms part of a kinetic experience of the Tower and wider London skyline along the bridge. Views of the Tower from this location showcase the Tower's attributes including as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance.

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These attributes were considered in detail during the Tulip public inquiry. The Inspector found that they ‘rely to a great extent on its setting’ (IR 14.25) and, of the latter three attributes, ‘the sky space component…is central to its OUV’ (IR 14.29).

The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London. While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower’s turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height.

b) The London Wall scheduled monument

This section of the Roman and medieval city wall is scheduled as ‘London Wall: remains of Roman wall and bastion, Camomile Street’ (NHLE reference 1005547). We know from previous excavations that much of this section of wall has been removed previously, retaining only a small section of wall below the current building.

Although the wall was first built by the Romans around AD 200, it continued to provide defence and security to Londoners into the turbulent medieval period. It also created a marked boundary for the city, a boundary that was both physical but also social, as it served to demarcate space for certain activities, such as burials.

In the Roman period, cemeteries were always placed outside the walls of the city. There is an obvious shift in practice during the medieval period, where cemeteries are in consecrated grounds associated with churches, and therefore allowed inside the walls of the city.

The non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich exemplifies this, as it is situated immediately inside the city wall and utilises the wall as its northern boundary. It serves to illustrate both the historical development of the London Wall as a physical and social boundary, and how the wall was integrated into the wider cityscapes of Roman and medieval London. Therefore, there is a direct historic association of the non-designated burial ground and the London Wall, which contributes strongly to our appreciation and understanding of the significance of the scheduled monument.

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There are limited places within the city where the wall retains its relationship with associated Roman and/or medieval archaeological remains. Until archaeological evaluation of the burial ground is carried out, we cannot confirm the level of survival of the burial ground. There is also the potential for other remains to be present here which pre-date the burial ground, possibly to the Roman period, which cannot be identified or assessed without proper evaluation. We therefore have to assume on the basis of desk-based evidence that, at a minimum, the burial ground is largely intact and that it retains its evidential value.

The setting of this section of London Wall is therefore likely to contribute highly to its significance.

c) The medieval and post-medieval burial ground

In addition to the importance of the burial ground in its relationship with the London Wall scheduled monument, the burial ground also has significance in its own right as a non-designated heritage asset.

The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich.

Further information on the burial ground and its significance is provided to you in an accompanying letter from the Greater London Archaeological Advisory Service.

Impact of the proposals on these heritage assets

a) The Tower of London

Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed detailed design. The additional height that would be introduced at its eastern edge, would result in an upward step in scale directly beside the White Tower, creating a greater cliff edge than the current situation.

The further encroachment of this development into the sky space around the Tower would present a greater distraction in views of its silhouette. The White Tower's silhouette is recorded in the 2016 WHS Management Plan as a key component of the World Heritage Site's attributes of OUV as an internationally famous monument, in a landmark siting, and reflecting the physical dominance of the White Tower. The latter

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reflects the Tower as a symbol of Norman power - an appreciation of this is similarly reliant on the clear sky backdrop.

The proposed building would appear different to the character of the existing cluster because of the unusual form that results from its eastern edge being twisted to face south, the staggered terraces and the contrast of materials on that eastern edge. It would therefore be more eye-catching than the existing Cluster buildings, which would compound the impact described above. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above.

The experience from Tower Bridge, as an example of the views of the Tower where this harm would be appreciated, is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it.

The proposals would leave less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City. The important sky space around its silhouette, which is essential to sustaining the attributes and values of the Tower discussed above, would be further compromised when compared to the existing situation. This would add to the cumulative harm to the attributes of OUV described above.

In its Technical Review report on the refused schemes at 31 Bury Street, regarding the LVMF view 10A.1, ICOMOS advised that "when that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. Whilst that comment concerned a different scheme - proposals at 63 St Mary Axe would be shorter - it is notable that the silhouette of the White Tower and its visual separation from the City would be impacted in a similar way.

b) The London Wall scheduled monument

The current proposals have been developed to include an area from which the London Wall can be readily viewed by the public.

We currently do not know what the condition of the wall is; however, there will likely be a need for a programme of conservation and/or consolidation. There will also likely be further design considerations that would need to respond to the condition of the wall when revealed. Specifically, there will be a need for closer analysis of the likely

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environmental conditions of the proposed space and if they would be appropriate for preserving the wall.

There is a small potential for harm to the fabric of the wall which could result from exposing it to the wider environment. However, it is likely that this harm could be adequately limited through appropriate conservation works, suitable environmental controls, and commitment to a programme of ongoing management. Therefore, we think that the proposals for revealing the wall within the design would enhance the significance of the monument through increasing its legibility and accessibility.

However, we also consider that there would be harm to the scheduled monument caused by the complete removal of the non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. Removal of the burial ground will likely destroy archaeological remains which have a direct historical association with the London Wall and which contribute to an understanding and appreciation of the scheduled monument.

The extent of this harm cannot be fully defined as no archaeological evaluation has been undertaken to confirm the level of retention of archaeological remains within the burial ground and to characterise any remains.

It should also be noted that no assessment of impacts on the London Wall scheduled monument (both adverse and beneficial) has been presented as part of the Environmental Statement or Archaeological Desk Based Assessment.

c) The medieval and post-medieval burial ground

As previously stated, the archaeological advisor for the City of London is the primary contact for advice in relation to the burial ground as a non-designated heritage asset.

However, we note here her position that the development proposal as submitted would result in the total loss of this non-designated heritage asset and that the impact of development on the burial ground has not been properly assessed in the Environmental Statement due to a lack of archaeological evaluation.

Relevant policy and guidance

a) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations

under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

The Framework sets out a presumption in favour of sustainable development. This requires pursuing three overarching objectives (economic, social and environmental) in mutually supportive ways - including the protection of the historic environment (Para 8).

Chapter 16 of the NPPF concerns the historic environment. Para 202 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required, including any contribution made by their setting. Where the site has the potential to include heritage assets with archaeological interest, it may be necessary that a field evaluation is also undertaken (Para 207).

Significance should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Para 208).

If harm is deemed to be less than substantial, harm should be weighed against the public benefits of the proposals (Para 215). Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Para 212). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Para 213).

It is also clear that, regardless of the ability to record evidence of our past (such as through a programme of archaeological works), this should not be a factor in deciding whether such loss should be permitted (Para 218).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 139 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

b) The London Plan

Polic HC1 requires development proposals to avoid harm by integrating heritage considerations early in the design process

Policy HC2 World Heritage Sites requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

The Tower of London is identified in the Plan as one of three Strategically Important Landmarks for London, and the importance of managing its setting is recognised in the strategic views policies HC3 and HC4, and the London View Management Framework (LVMF SPG, Mayor of London, 2012).

The LVMF reinforces that “new development should not harm a viewer’s ability to appreciate the OUV of a WHS” (Para 57). Specific to view 10A, it states that the Tower of London should not be dominated by new development close to it” and that “some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background” (Paragraphs 183 and 186)

Policy D3 requires a design-led approach for optimising sites, which means ensuring that development is of the most appropriate form and land use for the site. This requires consideration design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth.

Policy D9 states that any tall building “must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it”.

c) Historic England’s GPA3 ‘The Setting of Heritage Assets’ (2017)

GPA 3 sets out guidance on how to understand and assess the contribution of setting to the significance of a heritage asset The setting of a heritage asset is defined by the NPPF as ‘the surroundings in which a heritage asset is experienced’ (NPPF, Annex 2: Glossary). It also makes clear that setting ‘may include associative relationships’ (p.3).

It recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on

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significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

§ Proximity to asset
§ Position in relation to key views to, from and across
§ Prominence, dominance or conspicuousness
§ Competition with or distraction from the asset
§ Dimensions, scale and massing
§ Materials (texture, colour, reflectiveness, etc)
§ Change to skyline, silhouette
§ Lighting effects and 'light spill'

In regard to buried assets such as the London Wall, GPA3 makes clear that although the remains 'may not be readily appreciated by a casual observer', they retain a presence in the landscape' (p.5) and that:

> *Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the longterm continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible*. (p.5)

Historic England's position

The proposals would cause harm to attributes of OUV of the World Heritage Site, the significance of the scheduled monument and result in the total loss of the non-designated burial ground. Overall, we do not consider that the proposals have been developed in a way that sufficiently accords with the requirements of national and regional planning policy, which stipulate that heritage significance must inform the form of development proposals early on in the process.

Our advice does not preclude the redevelopment of the site. Harm could be greatly reduced, or potentially avoided, in each case with a lower building, which would avoid all three elements of heritage harm (to attributes of OUV of the WHS, the significance of the monument and the total loss of significance of the burial ground) while still achieving a considerable uplift in office space, thereby delivering sustainable development.

Such a scheme would accord with the design-led approach required by the London Plan, responding to all elements of the site's highly significant heritage context and its capacity for growth.

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a) The Tower of London World Heritage Site

Whilst the proposals were reduced in scale in response to our pre-application advice, we do not consider that this has adequately reduced the harmful impact. These proposals would continue to have a comparable impact to the 31 Bury Street proposals. That application (ref. 24/00021/FULEIA) was recently refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated.

In this case, we consider that the same attributes of OUV (as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance) and the integrity of the WHS would be harmed. We therefore recommend that the current application should be refused for the same reason.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the WHS. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals.

The submitted heritage impact assessment features many inconsistencies with the methodology required by UNESCO, the adopted SOUV and previous commentaries from ICOMOS as an advisory body to the World Heritage Committee. It has scoped out attributes of OUV where setting makes an important contribution (attributes that were identified in the Tulip decision, set out above). Furthermore, it has not assessed the kinetic impact, instead treating the viewpoint as static, and presents a limited assessment of the cumulative impact of the proposals.

ICOMOS has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (31 Bury Street Technical Review, 20/00848/FULEIA; 24/00021/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA). The World Heritage Centre subsequently

requested that the UK State Party submit a State of Conservation Report for the WHS, indicating UNESCO's serious concerns.

The application submission does not therefore adequately assess the impact on attributes of OUV, which is required by Para 200 of the NPPF and Policy HC2 of the London Plan.

b) London Wall scheduled monument

In relation to the London Wall scheduled monument, we acknowledge that there is a more complex exercise to be had in weighing the level of harm caused by complete removal of the non-designated, but associated, medieval burial ground and the enhancements proposed through exposing the wall, providing interpretation, and expressing it further through elements of the design.

This weighing exercise is further complicated by the lack of archaeological evaluation, and therefore the lack of key details regarding the condition and nature of the archaeological resource here. The Environmental Statement has not assessed impacts (adverse or beneficial) to the scheduled monument. However, we think that removing the associated, non-designated burial ground (which forms part of the London Wall's setting) would cause a level of harm to the scheduled monument which would not be outweighed by the heritage benefit of showcasing the wall.

Recommendation

Historic England objects to the application on heritage grounds. We recommend that it should be refused or withdrawn.

We note that the advice provided to you by the Greater London Archaeological Advisory Service recommends that further assessment of the impact of development on the burial ground be provided. As the burial site is intricately linked to the London Wall, we agree that further information and an assessment of the impacts on the scheduled monument should be required through a Regulation 25 request.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred

until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

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.

Please contact me if we can be of further assistance.

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
E-mail: [redacted]

Chris Reade
Inspector of Ancient Monuments
E-mail: [redacted]

Cc Helen Hawkins, GLAAS

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HISTORIC ROYAL PALACES

Environment Department (Planning)/Development Management
City of London
PO Box 270
Guildhall
London EC2P 2EJ

FAO Ms Georgia McBirney
By email to [redacted]

22 April 2025

Ref: 63 St Mary Axe, London EC3A 8AA

Planning Ref: 25/00223/FULEIA

Dear Ms McBirney,

We write in relation to the current consultation on the above referenced planning application, to express HRP's concerns about aspects of the scheme, which relates to the redevelopment of the site at 63A St Mary Axe, based on its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS).

HRP has previously been invited to view proposals for the site while these were in development, in March and July 2023. In response to the scheme presented in July 2023, which had been amended since March, HRP advised that it welcomed the reduction in height of 3 storeys and some enhancement in the lean away from the White Tower that had been achieved. However, it emphasised it wished to see a greater degree of lean-in to the eastern apex of 100 Leadenhall Street to enhance the sky space between the White Tower and better define the eastern edge of the City Cluster, and to preserve the LVMF view 10A.1 which is the key view that has most impact on the OUV of the World Heritage Site in terms of this proposed development. HRP also highlighted that, although the proposals sat within the draft city cluster profiles at that time, HRP was not in agreement with the tall vertical edge of that profile on the eastern edge and indicated it would be advocating for a more angled profile during the formal consultation (which it has since done so).

With regard to the submitted proposals (ref 25/00223/FULEIA), HRP wishes to reiterate its concerns about the profile and massing of the proposed tower element of the development, and its impact on the silhouette of the White Tower in LVMF view 10A.1. Whilst the slant achieved since the earlier iterations of the design are acknowledged, HRP maintains that the impacts on the OUV of the Tower of London

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could(should) be further mitigated with a steeper lean and a further reduced height.

HRP would also highlight that there remains a lack of consensus over the appropriate outline for the City Cluster, including at the eastern edge. Although the design appears to continue to sit within the proposed cluster profile, HRP does not agree that this provides sufficient protection to the Tower of London and LVMF view 10A.1. It therefore requests that the profile is modified as suggested above to mitigate the impact on the silhouette of the White Tower and thereby help to preserve the OUV of the Tower of London.

HRP is also concerned that the lower-level shoulder of the proposals might be more apparent in winter, without the benefit of tree cover, and requests that winter versions of View 10A.1 are provided so that this risk can be reviewed.

Please do not hesitate to get in touch with me should you wish to discuss any of the issues raised here further.

Yours faithfully

[redacted]

Adrian Phillips
Palaces & Collections Director
T [redacted]

Date: 22 April 2025
Our ref: 507023
Your ref: 25/00223/FULEIA

FAO Georgia McBirney
City of London Planning

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Madam,

Planning consultation: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis);the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St. Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development
Location: 63 St Mary Axe London EC3A 8AA

Thank you for your consultation on the above dated 17 April 2025 which was received by Natural England on 17 April 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

Richard Gibson
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).

Place Division / Development Management
Web: www.richmond.gov.uk/planning
Email: envprotection@richmond.gov.uk
Tel: 020 8891 1411
Textphone: 020 8891 7120

LONDON BOROUGH OF RICHMOND UPON THAMES

City Of London
63 St Mary Axe London EC3A 8AA

RECOMMENDATION DATED
23 April 2025

Dear Sir/Madam,

The Town and Country Planning Act 1990, (as amended)
Consultation – Raise no Objection

Application: **PA25/0698**
Type: Consultation Other
Our ref: DC/KEM_PA25/0698
Applicant: City Of London
Agent:

LOCATION
63 St Mary Axe London EC3A 8AA

for

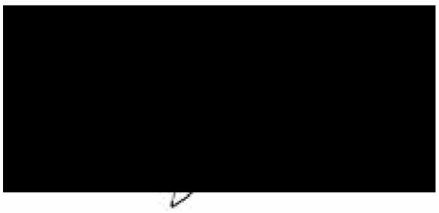
PROPOSAL
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

That the City Of London be advised that the London Borough of Richmond upon Thames raise no objection to the above mentioned proposal.

Yours faithfully,



Robert Angus
Head of Development Management (Richmond)

From: Gregory Barrett <[redacted]>
Sent: 02 May 2025 10:10
To: McBirney, Georgia <[redacted]>
Cc: Oliver Caroe <[redacted]> ; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for the extension of time to review these documents. Following our review, we offer no further comment on the scheme.

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

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Tel: 01223 472237

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London EC4M 8AD
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From: McBirney, Georgia <[redacted]>
Sent: 02 April 2025 10:45
To: Gregory Barrett <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

Good morning, Greg,

Thank you for your email below. We can agree to the extension until the 2nd May, if you are in a position to provide your comments earlier than the 2nd that would be appreciated.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

From: Gregory Barrett <[redacted]>
Sent: 01 April 2025 11:53
To: McBirney, Georgia <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for this. We also have periods of imminent upcoming leave, so might the 2nd May be workable?

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

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From: McBirney, Georgia <[redacted]>
Sent: 28 March 2025 08:58
To: Gregory Barrett <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

Good morning, Greg,

Thank you for your email below.

In terms of an extension to the consultation period, do you know how much longer you would need to respond to the consultation request.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

From: Gregory Barrett <[redacted]>
Sent: 27 March 2025 17:14
To: McBirney, Georgia <[redacted]>
Cc: Oliver Caroe <[redacted]>; Nancollas, Tom <[redacted]>
Subject: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

We have recently received notification of consultation for 63 St Mary Axe.

As we discussed recently with your colleague Tom Nancollas (copied in), we are dealing with a variety of planning caseload tasks related to the City at the moment - principally our representations and preparation for the forthcoming *City Plan 2040* Examination in Public.

As such, could we please request an extension to the deadline for us to respond?

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]

on behalf of Caroe Architecture Ltd

I may send email outside normal working hours from time to time.
Please be assured I do not expect a reply outside normal working hours.

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Website: http://www.cityoflondon.gov.uk

Georgia McBirney
City of London Corporation
By Email

Our ref: 2025/0190/S1
Your ref: 25/00223/FULEIA
Date: 6 May 2025

Dear Georgia McBirney

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
63 St Mary Axe, London, EC3A 8AA
Local Planning Authority reference: 25/00223/FULEIA

I refer to the copy of the above planning application, which was received from you on 20 March 2025. On 6 May 2025, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0190/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 86 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If the City of London Corporation subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the City of London Corporation under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, email [redacted]

Yours sincerely

[redacted]

John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
Emily Keenan, Agent, DP9

GREATER**LONDON**AUTHORITY

Planning report GLA/2025/0190/S1/01

6 May 2025

63 St Mary Axe

Local Planning Authority: City of London Corporation

Local Planning Authority reference: 25/00223/FULEIA

Strategic planning application stage 1 referral
Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal
Demolition of the existing office buildings and construction of an office-led mixed-use development consisting of a 46-storey building with office, cultural and community uses.

The applicant
The applicant is **AXA Investment Management,** and the architect is **Fletcher Priest Architects.**

Strategic issues summary
Land use principles: The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations.
Urban design and heritage: The proposed building is of high architectural quality and will deliver new public realm, however a final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.
Transport: Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics.
Other issues on **environment and sustainable infrastructure** also require resolution prior to the Mayor's decision making stage.

Recommendation
That the City of London Corporation be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 86. Possible remedies set out in this report could address these deficiencies.

Context

1. On 20 March 2025, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following category of the Schedule to the Order 2008:

   Category 1C *(b) a building that is more than 150 metres high and is in the City of London*

3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the City of London Corporation to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk

Site description

6. The 0.06 hectare site comprises two buildings constructed in the 1980s, the 8-storey Camomile Court to the west and the 9-storey 63 St Mary Axe to the east, which contain predominantly office uses. The site is bounded by Bevis Marks, Outwich Street, Houndsditch, and St Mary Axe. The site is located within the Central Activities Zone (CAZ) and is located near several tall buildings such as Salesforce Tower, 100 Bishopsgate, the Pan Pacific London and 70 St Mary Axe.

7. The site contains a Scheduled Monument (remains of a Roman wall) and remains of a burial ground. The site is in the setting of The Tower of London World Heritage Site (WHS) but not within its Buffer Zone. The site falls within London View Management Framework (LVMF) Views 4A.1 Primrose Hill, 10A.1 City Hall to the White Tower, 15B.2 Waterloo Bridge and 25A.1 to 3 The Queen's Walk at City Hall.

Details of this proposal

8. Demolition of the existing office buildings and construction of an office-led mixed-use development consisting of a 46-storey building with office, cultural and community uses.

Case history

9. The GLA held pre-application meetings with the applicant team (also attended by the City Corporation) in April 2022, October 2022, November 2023, and February 2024 in respect of proposals to redevelop this site for a phased mixed-use redevelopment of the site. Previous pre-application meetings were held in 2013, 2019 and 2020. The applicant was advised that the uplift of high-quality office floor space in the CAZ was strongly supported, however, concerns were raised with the potential impacts of the tall building on the setting of the WHS.

10. The London Review Panel (LRP) undertook a design review with GLA and City officers, and applicant, on 17 May 2024. The LRP were broadly supportive of the proposals, with comments provided on the quality of the public realm and accessibility of spaces, facades and planting, and sustainability.

Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021; and the City of London Local Plan 2015.

12. The following are also relevant material considerations:

    The National Planning Policy Framework and National Planning Practice Guidance;

    Tower of London World Heritage Site Management Plan;

    Tower of London Local Setting Study: An Assessment of the Local Setting of the Tower of London and Guidelines for its Management (August 2010);

    Draft City Plan 2040; and

    Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on land use principles, urban design, heritage, transport, sustainability, and environment, which can be found on the GLA's website here.[1]

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507

Land use principles

13. The proposal for an office-led mixed-use redevelopment of the site, providing an uplift of 85,624 sq.m. of office floor space in the CAZ, is strongly supported in land use terms, in line with Policies SD4 and E1 of the London Plan. The applicant is not providing affordable workspace in line with Policy E3 of the London Plan. Given this is not required by local policy, the non-provision is acceptable in this instance.

14. The proposed development includes 4,006 sq.m. of cultural and community uses and 461 sq.m. of multi-functional space. Although the site is not located in a specific cultural quarter of the CAZ, the use of part of the building for cultural floorspace is strongly encouraged as it would help to enhance and expand London's cultural assets in line with Policies HC5 and SD4 of the London Plan. Further details on the use, access, fit-out and future management of the cultural uses should be provided to the City Corporation and be appropriately secured by condition or obligation. Any community use on the site should be fully accessible to the public and a community use agreement and management plan should be secured in a S106 agreement in line with Policy S1 of the London Plan.

15. Overall, the redevelopment of the site is strongly supported in principle, subject to addressing the issues set out in this report.

Urban design

16. The London Review Panel (LRP) undertook a design review with GLA and City officers, and applicant, on 17 May 2024. This is considered to meet the requirements of Policy D4 of the London Plan.

Development layout

17. GLA officers are supportive of the public realm at street level and public uses within the building which could be a transformational addition to the area. The active frontages at lower levels of the buildings will contribute positively to the street environment.

18. The future management of the public spaces internally and externally, including the entrances themselves, should be carefully considered to create spaces that are welcoming, unique, and engaging with maximum hours of accessibility. The double-height glazed sliding entrance screens, if fully open as frequently as possible, will facilitate this.

19. Public seating has been included in Camomile Park and within the internal public spaces of the building to help facilitate spontaneous activation and create a place for informal meeting for the local community. The sense of identity could be strengthened by the inclusion of a sculpture or water features or commissioning of local artwork.

20. A sunlight study has been carried out to inform the planting proposals at lower levels beneath the projecting upper floors. The LPA should ensure that appropriate plant specification and maintenance is secured by condition to ensure that this key feature of the proposals thrives.

Tall buildings, scale and massing

21. The proposal includes a 46-storey building. This constitutes a tall building according to the LPA's local definition. The site is identified in the adopted and draft local plan as a site which is suitable for tall buildings, however, no heights have been specified. Therefore, this leads to a technical policy conflict with the locational requirements of Policy D9 (Part B) of the London Plan.

22. In terms of visual impacts, the overall height and massing of the scheme is well considered and works as a calm addition to the Eastern Cluster. The proposed materials and colour palette for the upper levels achieve a visual non-prominence which may help mitigate the sky gap reduction. The landscaped terraces at upper levels are less verdant than indicated at pre-application stage, which is supported. GLA officers are supportive of the amendments to the appearance of the crown to increase its significance.

23. With regards to the functional, environmental (including daylight, sunlight, glare, light, and wind impacts), and cumulative impacts, the LPA's assessment of these aspects will be reviewed at Stage 2.

Strategic views

24. The site falls within London View Management Framework (LVMF) Views 4A.1 Primrose Hill, 10A.1 City Hall to the White Tower, 15B.2 Waterloo Bridge and 25A.1 to 3 The Queen's Walk at City Hall. The design development process has achieved iterative improvements in the relationship of the building with the WHS in LVMF View 10.A.1, however potential impacts have been identified as discussed in the Heritage section below.

Internal quality

25. GLA officers are supportive of the internal layout to provide cultural and community uses in the building, which are the result of an engagement process to understand people's needs and aspirations. The inclusion of weather-protected non-transactional spaces that are accessible to all should be secured by the LPA. The office accommodation appears to be high quality and the multiple external terraces for office workers are strongly supported.

Architectural quality

26. The proposed materials and colour palette will provide the building with a high-quality appearance. Refinement of the visibility of the mid-level plant floors on the St Mary Axe elevation could be considered.

Public toilets

27. The proposed development includes a public toilet in line with Policy S6 of the London Plan. Management and maintenance details should be appropriately secured.

Free drinking water

28. The proposed development includes a water fountain in line with Policy D8 of the London Plan. Its provision and future management should be secured by condition.

Fire safety

29. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

30. Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with Policies D12 and D5 and all proposed measures should be secured by appropriate conditions.

Inclusive design

31. An inclusive design statement has been included in the application submission which identifies design and mitigation measures which should be secured to achieve an inclusive environment.

Heritage

32. Policy HC1 of the London Plan states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. As the site is in the setting of Tower of London World Heritage Site (WHS), London Plan Policy HC2 is relevant which states that development proposals in the setting of a WHS should not compromise the ability to appreciate their Outstanding Universal Value (OUV). Changes to setting can either have an adverse, neutral or beneficial impact on the ability to appreciate the site's OUV.

33. Beneath the existing buildings is a Scheduled Monument, London Wall: remains of Roman wall and bastion, Camomile Street, which forms part of the Roman wall around the northeast of the city. The site also contains a raised landscaped area, which is the remains of the graveyard of St Augustine Papey and St Mary Outwich.

34. The proposals include the full excavation, preservation in situ, presentation to public view and historical interpretation of a 5-metre stretch of the Roman wall. The proposals include appropriate hard and soft landscaping and historical interpretation of the on-site churchyard. This enhancement, once managed through conditions and secured through the S106 agreement would form welcomed heritage-related public benefits.

35. It is considered that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table of indirect (setting) impacts			
Designated heritage asset	**Category of harm**	**Extent of harm**	**View reference**
Tower of London WHS, Scheduled Monument, Grade I, II* and II listed buildings and conservation area	Less than substantial	Low to middle	Views 4, 5, 6, 7, 8a-c, 9, 10, 11, 12, 13, 14, 15
Botolph Street group: Church of St Botolph Aldgate, listed Grade I; Sir John Cass School, listed Grade II*;	Less than substantial	Very low	Views 17, 18, 26
Church of St Helen, listed Grade I;	Less than substantial	Very low	View 22
Lime Street group: Church of St Mary Undershaft, listed Grade I; Lloyds Building, listed Grade I;	Less than substantial	Low	View 21
Bank group: The Royal Exchange, listed Grade I; 13 Bishopsgate, listed Grade I; Numbers 51-53 Threadneedle Street, listed Grade II*.	Less than substantial	Very low	View 3

36. In the view from the north bastion of Tower Bridge (View 8b, which is also LVMF View 10A.1) the angle of view shows a closing of the sky gap between the White Tower and the Eastern Cluster, of which the proposed building forms a part. In this view, the height of the proposal is now equivalent to the shoulder height of the Salesforce Tower to the west, and the eastern edge of the proposed development follows the edge line of the Pan Pacific Hotel. In this view an area of open sky will be obscured by the proposed development. It is also noted that the building will be closer to the viewer than either the Salesforce Tower or the Pan Pacific Hotel. The closing of the gap is considered to cause less than substantial harm at a low to middle extent to the setting of the Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the Outstanding Universal Value of the Tower of London.

37. As the proposal is considered to result in a very low to middle level of less than substantial harm to heritage assets, the proposed development is therefore contrary to Policy HC1 and HC2 of the London Plan. Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm

should be attributed considerable importance and weight and weighed against the public benefits of the proposal.

38. GLA officers acknowledge that the proposal would deliver public benefits such as the delivery of new office space within the CAZ, publicly accessible cultural and community floor space, and new public realm improvements in addition to the heritage benefits associated with the Roman Wall. GLA officers will report at Stage 2, following a full assessment of the heritage impacts of the proposals by the City of London Corporation and once these public benefits have been secured by the Corporation to ensure that full weight can be given to these public benefits, to outweigh any harm identified.

Transport

Transport assessment

39. The Transport Assessment (TA) generally follows TfL guidance and includes an Active Travel Zone (ATZ) assessment including a night walkaround in alignment with the Women's Night Safety Charter, the Mayor's Violence Against Women and Girls Strategy, and Policy T4 Part B of the London Plan.

40. The LPA should consider securing highway works in kind or S106 contributions to their own relevant projects based on the outputs of the day and night ATZ assessments.

41. Measures should be proposed to ensure the public realm at and within the boundary of the site is always well lit and overlooked to maximise safety, including during any pedestrian diversions or gantries needed for construction.

42. Further contribution requests and comments on technical analysis elsewhere in the TA are outlined in detail below.

Public transport impacts

43. Distributional analysis of expected trips in terms of which local National Rail and London Underground (LU) stations might be used by visitors to and from the development has been provided; however, this does not split expected inward and onward travel by directions, platforms or lines as requested at pre-application stage.

44. The proposal meets TfL's strategic modelling threshold. As such, the TA should include directional analysis for buses, National Rail and London Overground (OU) / LU trips (including line loadings expected from the proposal).

45. The applicant is therefore advised to further engage with TfL to discuss and agree on the scope of modelling requirements through a follow up strategic modelling meeting.

46. Further public transport capacity modelling or equivalent technical analysis approved in principle by TfL is necessary to fully demonstrate compliance with Policy T4 Part F of the London Plan. This should be addressed prior to Stage 2.

47. Standard conditions are also requested for LU infrastructure protection and the applicant is strongly recommended to engage further with LU directly to ascertain the exact requirements based on the likely impact of the development to sub-surface LU infrastructure before, during and after its construction.

Highway impacts

48. The proposal for a minor relocation of the on-highway bus stands on Houndsditch to accommodate a new pedestrian route crossing to follow desire lines may be supported. Further clarification is required for bus standing at least equivalent to the current capacity, including driver and other associated facilities that would remain in in any new future highway layout. Swept paths for vehicles entering the proposed disabled parking and servicing area from the public highway must be provided.

49. TfL has requested a distribution of forecast pedestrian and cycle trips to determine the impact on their A10 corridor scheme and inform any mitigation. This is necessary to enable viable and proportionate costing of any S106 contribution to that scheme, pooled with other local committed developments in the vicinity.

50. Subject to further negotiation and the outcome of pedestrian distribution analysis once it has been provided, TfL may also request a contribution to their emerging TLRN A10 corridor scheme. This would be used to deliver strategic highway improvements at the Bishopsgate/Camomile Street junction. The sum requested would be proportionate to contributions recently secured from other significant developments in the City Cluster such as 55 Bishopsgate.

51. If preferable to the applicant, suitable mitigation works for the A10 could also be finalised through further modelling and design work prior to commencement and implemented through a S278 agreement. The S106 agreement would then need to specify an agreed scope of S278 works to be subsequently designed, validated and delivered by the applicant, including all technical assurance, road safety audits and traffic modelling if requested, with all necessary auditing.

Car parking

52. The proposed car-free nature of the scheme except for two disabled parking spaces is welcomed and aligns with Policy T6 of the London Plan. This should be secured by condition.

53. It is understood that the adjacent servicing area may be used for open space / retail during daytime, therefore consideration should be given ensuring disabled car users would not conflict with other visitors at the proposed ground floor open space.

Cycling and cycle hire

54. The proposed cycle access from Houndsditch is acceptable but provision of an additional alternative access point and route in from St Mary Axe should be considered.

55. The proposed mix of cycle parking is acceptable in principle, despite an under provision of 27 visitor spaces. The TA notes these spaces are required by the London Plan but not proposed and has offered to fund their creation off-site through a S106 obligation.

56. Under provision of cycle parking spaces against London Plan standards can only be supported subject to agreement by the applicant of significant financial contributions to the local London Wall highway scheme, which will improve surrounding highway conditions for cyclists in line with Policy T5 of the London Plan, and to free Cycle Hire memberships for initial occupants of the development.

57. The outline Cycle Promotion Plan submitted instead of a Travel Plan is broadly acceptable. However, S106 contributions toward its monitoring and £200,000 for free TfL Cycle Hire memberships to be offered to site users at first occupation and within the following 5 years should also be secured. The applicant should engage directly with TfL on this matter.

58. The applicant should ensure the design of all cycle parking accords with the with the London Cycle Design Standards (LCDS) as also set out in Policy T5. The provision of cargo bike spaces should be considered given the anticipated demand for the future. Details on the space of and location of the cycle parking should be provided prior to Stage 2.

Deliveries and servicing

59. Servicing access is proposed from Houndsditch using vehicle lifts which would be able to accommodate vehicles up to 7.5T panel van in size. The access location and effective vehicle size limit are acceptable in principle in line with Policy T7 of the London Plan. Robust measures and facilities to enable and increase the number of deliveries by cargo bike should feature in the proposals in both the TA and the outline Delivery and Servicing and Cycle Promotion Plans.

60. Concerns remain in relation to lifts, which may be subject to potential failure and associated impacts on the surrounding road network. In line with similar developments recently consented nearby, it is recommended to restrict delivery and servicing by motor vehicles including motorcycles by condition to between 11PM and 6AM only on weekdays. This is appropriate to support Part G of Policy T7 which highlights that developments should be designed and managed to receive deliveries. At present, restrictions are proposed from 7am -10am, 12pm – 2pm and 4pm – 7pm only.

61. The inclusion in the submitted outline Delivery and Servicing Plan of proposals to use an off-site freight consolidation centre and maximise the use river freight,

cargo bikes and available local ‘last mile’ logistics hubs are welcomed. However, as stated above, to support those aspirations, stringent restrictions on daytime deliveries by motorised modes and provision of specific on-site facilities for cargo bikes, including at the main entrance, must also be proposed and appropriately secured.

62. Any waiting areas on the public highway, even expected to be used only for infrequent overspill loading or in emergencies, must be agreed in advance with TfL and the LPA prior to Stage 2, and secured via S106 and S278.

63. Along with other requested further information and obligations, this is essential to prevent any unacceptable impact on the existing bus stand directly to the north of the site in accordance with Policies T3 and T4 of the London Plan.

Construction logistics

64. The submitted outline Construction Logistics Plan (CLP) is broadly acceptable in principle in line with Policy T7.

65. A very large number of vehicles are expected including over 60 HGVs per day during the busiest month of the overall construction programme. Access routes to and from the site include key junctions of the TLRN in close proximity, which are also part of TfL's A10 corridor walking, cycling and highway safety improvement scheme. TfL works nearby may coincide with construction access to support implementation of the development.

66. As such the CLP itself may require further future design assurance, traffic modelling and S278 highway works on both local highway and the TLRN, which should be referenced in any planning decision and secured by condition in the S106 agreement.

Environment and sustainable infrastructure

Energy strategy

67. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

68. An energy statement has been submitted with the application. The energy statement does not yet comply with Policies SI2, SI3 and SI4 of the London Plan. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the LPA and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

    Be Lean – further evidencing of energy efficiency measures/modelling techniques for the non-domestic element;

Be Clean – demonstration that the number of energy centres has been minimised;
Be Green – demonstration that renewable energy has been maximised, including more detailed roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

Carbon savings

69. The development is estimated to achieve a 33% reduction in CO2 emissions compared to 2021 Building Regulations.

70. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. This is unacceptable and the carbon savings must be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the LPA's carbon offset price. The draft S106 agreement should be submitted when available to evidence the agreement with the LPA.

Whole life-cycle carbon

71. In accordance with Policy SI2 of the London Plan, the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

72. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with Policy SI2. Further information is required on the operational modelling methodology, cost per building element, GGBS availability, material quantity, assumptions and end of life scenarios, and GWP potential.

73. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website[2].

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance

Circular economy

74. The London Plan requires development proposals to integrate circular economy principles as part of the design process, and referable applications must submit a Circular Economy Statement.

75. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with Policy SI7. The applicant should provide a pre-demolition audit, end-of-life strategy, site waste / resource management plan, cut and fill calculations and / or excavated materials options assessment, circular economy workshop or meeting notes, and reused or recycled content calculations.

76. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[3].

Urban greening and biodiversity

77. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.57 which exceeds the target score of 0.3. The applicant should explore additional opportunities to increase the urban greening and the LPA should secure all greening measures to ensure the target is met.

78. The applicant has set out that there would be a biodiversity net gain of 6,943.64% which complies with the London Plan. Measures to secure the biodiversity net gain should be secured by the LPA.

Sustainable drainage and flood risk

79. The flood risk assessment (FRA) provided generally complies with Policy SI.12 of the London Plan. Direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk.

80. The sustainable urban drainage strategy does not comply with Policy SI.13 of the London Plan. Whilst the FRA states that runoff will be restricted to 0.93 l/s (QBAR greenfield rate), the table in Section 5.2.1 of the drainage strategy indicates a proposed runoff rate of 2.9 l/s. This inconsistency should be clarified to ensure the design aligns with the agreed drainage parameters. The applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits. The LPA should also include in the SuDS maintenance arrangements the assessment of exceedance flood flow routes, the use of any pump discharges is appropriate, and the completed LPA version of the London Sustainable Drainage Proforma.

81. The water efficiency measures generally meet the requirements of Policy SI.5 of the London Plan.

[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

Air quality

82. The applicant should clarify whether the site is located within an air quality focus area as the submitted reports conflict with the maps. The applicant has provided an air quality assessment, and it was determined the scheme would be air quality neutral. Further information is required on the air quality positive assessment. The LPA should identify all appropriate mitigation and appropriately secure these as part of any future planning permission.

Local planning authority's position

83. City of London Corporation planning officers are currently assessing the application. In due course the City of London Corporation will formally consider the application at a planning committee meeting.

Legal considerations

84. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the City of London Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the City of London Corporation under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

85. There are no financial considerations at this stage.

Conclusion

86. London Plan policies on land use principles, urban design, heritage, transport, sustainability, and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

    Land use principles: The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations.

Urban design and heritage: The proposed building is of high architectural quality and will deliver new public realm, however the final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.

Transport: Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics.

Environment and sustainable infrastructure: Further information is required for the energy strategy, whole life cycle carbon, circular economy, green infrastructure, water and air quality.

For further information, contact GLA Planning Unit (Development Management Team):
Zeb McInnes, Senior Strategic Planner (case officer)
email: [redacted]
Matt Christie Team Leader – Development Management
email: [redacted]
Allison Flight, Deputy Head of Development Management
email: [redacted]
John Finlayson, Head of Development Management
email: [redacted]
Lucinda Turner, Assistant Director of Planning
email: [redacted]

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

City of London Planning Department

Submission by email:
PLNComments@cityoflondon.gov.uk

Dalia Alghoul
Town planning Technician
1 Stratford Place,
London
E15 1AZ

Date: 9 May 2025

NR Reference:
TPA/3PT/25/530

Network Rail Consultation Response

Reference: 25/00223/FULEIA
Location: 63 St Mary Axe London EC3A 8AA.

Dear Sir/Madam,

Thank you for consulting Network Rail (NR) regarding the planning application reference: 25/00223/FULEIA. Network Rail would like to be contacted for future applications in the vicinity of Liverpool Street Station.

Liverpool Street Station Capacity Considerations

In reviewing the application, it is important to highlight that the forecast additional growth in rail demand at Liverpool Street Station (LST), considered on an individual development basis, can be accommodated by the available and planned *on-train* capacity.

However, NR remain concerned about the *cumulative* impact of multiple consented and proposed major developments in the immediate vicinity of LST — particularly in relation to medium-term pedestrian flow and station concourse capacity. At present, there is no committed or funded scheme to address this growing 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 development in the area.

NR would therefore encourage the City to continue to consider potential allocation of its Community Infrastructure Levy (CIL) funds in addressing the collective infrastructure challenges created by cumulative growth.

I trust the above clearly sets out 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

From: [redacted]
To:
Subject: Re: 63 St Mary Axe - Planning Application - Re-Consultation
Date: 09 May 2025 13:42:14
Attachments: image.png

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Classification: Internal

Dear Sir/Madam,

We have now assessed the additional information in relation to the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the additional information.

Therefore, our previous safeguarding comments remain valid and should still be consider at all future stages of this development.

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
[redacted]
WEBSITE [redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

CYRRUS BRIGHTON CITY AIRPORT

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:58
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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COMPANY PARTICULARS: For particulars of Heathrow companies, please visit http://www.heathrowairport.com/about-us. For information about Heathrow Airport, please visit www.heathrowairport.com

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: [redacted]
To:
Subject: LPA Reference: 25/00223/FULEIA Standing Advice Response
Date: 09 May 2025 16:42:35

THIS IS AN EXTERNAL EMAIL

LPA Reference: 25/00223/FULEIA

ATE Reference: ATE/25/00441/FULL

Site Address: 63 ST MARY AXE, LONDON, EC3A 8AA

Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:
https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000003Dxa1IAC;2a75d692f626b35aec29bae6a83dfa3d:ref]

LPA Ref: 25/00223/FULEIA

London City Airport Ref: 2025/LCY/122

Date: 12/05/2025

Dear Georgia McBirney,

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	25/00223/FULEIA
Proposal	Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. AMENDED APPLPICATION
Location	63 St Mary Axe London EC3A 8AA
Borough	City of London
Case Officer	Georgia McBirney

London City Airport's response must change to an objection unless the condition is applied to this planning permission.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of

obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also make the following observations:

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

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.

Kind regards,

Simon Vince
On behalf of London City Airport

From: [redacted]
To:
Subject: RE: 63 St Mary Axe - Planning Application - Re-Consultation [SG37805]
Date: 13 May 2025 12:42:57
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37805

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: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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Dear Sir or Madam,

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Kind regards,

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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

25/1538/K
25/00223/FULEIA
15 May 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:	**63 St Mary Axe, London, EC3A 8AA**
Applicant:	**C/O Agent**
Proposal:	**An application has been received for: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**

Drawings

I refer to your letter dated 09 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: [redacted]
To:
Cc:
Subject: FW: 63 St Mary Axe - Planning Application - Re-Consultation
Date: 16 May 2025 09:44:00
Attachments: 25-00223-FULEIA - Consultee Re-consultation Letter.rtf
63 St Mary Axe Archaeology final.pdf

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Thank you for reconsulting me on this application. The additional information submitted does not affect my previous advice which I have attached

Regards

Helen

Historic England

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Historic England

Ms Georgia McBirney
Planning Administration
Environment Department
City of London Corporation

Your Ref: 25/00223/FULEIA
Our Ref: 231485

Contact: Helen Hawkins
[redacted]

08 April 2025

Dear Ms McBirney,

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

63 St Mary Axe London EC3A 8AA
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 March 2025.

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

Assessment of Significance and Impact

GLAAS advises the City of London on their non-designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter.

The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable.

Significance

The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings –this is explained further in the Development Advice letter.

At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street.

Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period.

An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial

ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset –the burial ground –into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'.

Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset.

Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well-preserved Roman deposits were encountered. This is a significant omission.

Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it.

Impact

Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains.

The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully compensated for by the proposed new park design for the area.

The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new

development. The Scoping response also requested that the results of the proposed pre-determination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided.

The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works.

The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Policy

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 and that a field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

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

The City Local Plan Policy DM 12.4 requires that 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 and that schemes preserve, protect, safeguard and enhance archaeological monuments, remains …where appropriate. The supporting text says "The City Corporation will refuse schemes which do not make any provision for the incorporation, safeguarding or preservation in situ of nationally or locally important monuments or remains, or which would adversely affect those monuments or

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.

remains".

If preservation is not achievable then 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.

Conclusion and Recommendations

The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed.

The development proposal as submitted would result in the total loss of this non-designated heritage asset.

We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision.

Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken.

If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

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

This response relates solely to archaeological considerations.

Yours sincerely

Helen Hawkins

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

Georgia McBirney
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/25/00489
Your ref: 25/00223/FULEIA

16 May, 2025

Enquiries to: Robin Bennett
Tel:
Email: [redacted]

Dear Georgia McBirney,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location 63 St Mary Axe London EC3A 8AA
Proposal Observations requested by City of London in relation to Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed 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 The application proposes a development which would provide c85,000sqm Grade A office floorspace. The London Borough of Tower Hamlets (LBTH) acknowledges that this has the potential to make a significant contribution towards the growth in office development, and consequent long term economic and employment growth, that is sough in the City of London's Local Plan 2015 and the emerging City Plan 2040.

In considering the effect of the proposal on land within LBTH, particular regard has

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

been had to the Townscape and Visual Impact Assessment and Heritage Impact Assessment submitted with the application.
In the majority of views the development does not raise significant concerns, as it is either fully or partially obscured by existing buildings, appears at a sufficient distance from the White Tower to avoid a meaningful impact, or is read as part of a wider backdrop of tall buildings. LVMF View 10A.1 does, however, warrant particular attention due to the increased visual proximity of the development to the White Tower and its potential effect on the composition of the view.

From this viewpoint, the cluster of tall buildings in the City appears much closer to the White Tower, which is the central feature of the WHS, with only a narrow gap separating them. The LVMF guidance highlights that the appreciation of the Tower of London's detailed architecture and historic layering is enhanced by the surrounding free sky space.

The proposed development would be visible in this view, positioned in front of existing tall buildings, including the Salesforce Tower (formerly Heron Tower). Although it would retain the final part of the gap between the cluster and the White Tower, its presence would intensify the visual dominance of built form and contribute to the crowding of the White Tower's immediate setting. The development would also appear taller than the current building at the cluster's edge, reducing the sky space between the cluster and the White Tower and competing visually with the tower's corner turrets. While the building leans away from the White Tower, mitigating some sky space loss, this design also introduces a more striking and potentially distracting form, where a calmer appearance might better respect the WHS setting.

Overall, LBTH consider that the proposed development would result in only limited harm to the WHS, taking into account the number and variety of views in which they are experienced together. However, in the context of viewing location 10A.1, the proposed development is considered to cause some harm to the setting of the WHS. The decision maker should carefully consider this harm and weight it against the public benefits of the scheme.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

Georgia McBirney
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/25/00859
Your ref: 25/00223/FULEIA

Enquiries to: Robin Bennett
Tel:
Email: [redacted]

16 May, 2025

Dear Georgia McBirney,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	63 St Mary Axe London EC3A 8AA
Proposal	Observations requested by City of London for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118. RE-CONSULTATION due to the submission of additional information.

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 The London Borough of Tower Hamlets (LBTH) has considered the additional information that is subject to the re-consultation. LBTH do not wish to add to the comments in their letter dated 16 May 2025 under LBTH ref:PA/25/00489, and ask

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

that these are taken into account by the City of London in the determination of the application.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

19th May 2025

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Applicant:

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2025/00950/OBS**

Registered on: **2nd April 2025**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

63 St Mary Axe London EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes
E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St
Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place
Department: Joanne Woodward

[redacted]

Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

creating a better place
for people and wildlife

Environment Agency

Georgia McBirney
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/137997/02
Your ref: 25/00223/FULEIA

Date: 21 May 2025

Dear Georgia

63 St Mary Axe, London, EC3A 8AA.

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Thank you for re-consulting us on the above application on 9 May 2025.

Environment Agency Position

We continue to have **no objections** to this application. However, we would like to draw your attention, and that of the applicant, to the following advisory comments.

Advice to Local Planning Authority and applicant:

Development in close proximity to activity regulated by an Environment Agency permit advisory
New developments within 75m metres of Medium combustion plant (MCP) could result in impacts including the nearby community being exposed to fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new

development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations (EPR) require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

Advice to Local Planning Authority

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Use of Sustainable Drainage Systems (SuDS)
Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

the CIRIA C697 document SuDS manual
HR Wallingford SR 666 Use of SuDS in high density developments
CIRIA C635 Designing for exceedance in urban drainage – good practice
the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent'

standard for water consumption (category ‘WAT 01’), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

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.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely

Demitry Lyons
Sustainable Places Planning Advisor

[redacted]

From: [redacted]
To:
Subject: RE: 63 St Mary Axe - Planning Application - Re-Consultation
Date: 22 May 2025 13:51:46
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Good afternoon,

25/00223/FULEIA
Location: **63 St Mary Axe London EC3A 8AA**
Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground infrastructure.

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

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

a. Provide predicted short term and long-term ground movement effects of the works on LU structure or tunnels and in particular changes in stresses, changes in heave or settlement, distortion of the structure or tunnels due to required temporary and permanent works.
b. provide detailed design and Risk Assessment Method Statement (RAMS) for both temporary and permanent works associated with demolition, excavation and construction of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling.

Reason: To ensure that the development does not impact on existing London

Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Mitigating risk - while helping London develop.

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Friday, May 9, 2025 12:59 PM
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

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

From: SM-NE-Consultations (NE) <[redacted]>
Sent: 27 May 2025 18:20
To: PLN - Comments <[redacted]>
Subject: FAO. Georgia McBirney [Re: 63 St Mary Axe - Planning Application - Re-Consultation]

THIS IS AN EXTERNAL EMAIL

Please see below for Natural England's response to this consultation.

Dear Ms McBirney

Application Ref: 25/00223/FULEIA
Our Ref: 512637

Thank you for your consultation.

Natural England has previously commented on this proposal in our letter dated 22 April 2025 [NE Ref: 507023] and enclosed for your convenience.

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 sincerely

Paul Scott

Natural England
Consultation Service
County Hall, Spetchley Road, Worcester, WR5 2NP.

consultations@naturalengland.org.uk | www.gov.uk/natural-england



We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

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 while securing good results for the natural environment.

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team
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Website: http://www.cityoflondon.gov.uk
This message has been sent using TLS 1.2 This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Date: 22 April 2025
Our ref: 507023
Your ref: 25/00223/FULEIA

FAO Georgia McBirney
City of London Planning

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Madam,

Planning consultation: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis);the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St. Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development
Location: 63 St Mary Axe London EC3A 8AA

Thank you for your consultation on the above dated 17 April 2025 which was received by Natural England on 17 April 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

Richard Gibson
Consultations Team

From: [redacted]
To:
Cc:
Subject: FW: 25/00223/FULEIA 63 St Mary Axe - Re-Consultation
Date: 30 May 2025 17:25:35
Attachments: image001.png

Hello,

Could the email below please be logged and uploaded as consultation response from Historic England on 25/00223/FULEIA –63 St Mary Axe.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

Advance Leave Notice:
From the 11th June returning on 23rd June
From the 15th September returning on 22nd September

From: Bowring, Alexander <[redacted]
Sent: 29 May 2025 15:33
To: McBirney, Georgia <[redacted]
Cc: Reade, Chris <[redacted]>
Subject: 25/00223/FULEIA 63 St Mary Axe - Re-Consultation

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Thank you for reconsulting Historic England on this application.

A revised Heritage Impact Assessment and a video of the 3D model of the proposed development illustrating the kinetic experience of Tower Bridge have been submitted.

We continue to refer you to advice letter of 16 April 2025 –the additional information does not overcome the concerns that we have previously set out. The video in particular illustrates the harmful impact of the proposals on the Outstanding Universal Value of the Tower of London World Heritage Site that we have described.

Historic England continues to object to the application on heritage grounds. However, we would welcome further discussion with the applicants and your authority about possible amendments to the proposals which would reduce the harmful impact on the important heritage assets previously discussed, including the World Heritage Site, the scheduled monument and the burial ground.

Please contact Chris and I if we can be of any further assistance.

Kind regards

Alex Bowring
Inspector of Historic Buildings and Areas
London and South East Region
Historic England
Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Email: Alexander.Bowring@HistoricEngland.org.uk

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 09 May 2025 12:59
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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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: 25/03284/OBS

Please reply to: Nikki Mitchell
Tel No: [redacted]
Email:

Georgia McBirney
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

29 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.: 25/03284/OBS **Application Date:**

Date Received: 09.05.2025 **Date Amended:** 09.05.2025

Plan Nos: Letter from City of London dated 9 May 2025.

Address: 63 St Mary's Axe, City Of London, London, EC3A 8AA

Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

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.

Crystal Mark
Clarity approved by Plain English Campaign

Your Ref:
Our Ref: 25/01599/OBS

Lambeth

City Of London

PO Box 270
Guildhall
London
EC2P 2EJ

4th June 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: 25/01599/OBS Date of Application: 09.05.2025 Date of Decision 04.06.2025

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: 'Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.', at: 63 St Mary Axe, London, EC3A 8AA. [RE-CONSULTATION due to the submission of additional information.] Reference number: 25/00223/FULEIA

Approved Plans

Consultation letter from City of London dated 15 May 2025

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

PEOBSZ

Conditions

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 4th June 2025

London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

6th June 2025

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Applicant:

City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2025/01302/OBS**

Registered on: **12th May 2025**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

63 St Mary Axe London EC3A 8AA

25/00223/FULEIA - Reconsultation - Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place Department: Joanne Woodward

[redacted]

Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

From: [redacted]
To:
Cc:
Subject: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA) Re-consultation
Date: 06 June 2025 13:39:34

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for letting us know of the re-consultation of this scheme. Following review, we offer no further comment on the scheme.

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

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Cambridge Office:
Office 5, Unit 8; 23-25 Gwydir Street
Cambridge CB1 2LG
Tel: 01223 472237

London Office:
The Surveyor's Office, The Chapter House, St Paul's Churchyard
London EC4M 8AD
Tel: 020 7246 8341

Visit our website: caroe.com

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From: [redacted]
To:
Subject: 63 St Mary Axe, London, EC3A 8AA. Application no. 25/00223/FULEIA
Date: 10 June 2025 10:22:17
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

FAO Georgia McBirney, Planning Case Officer

Dear Georgia,

Thank you for re-consulting the Council for British Archaeology on this revised application.

We refer you to our previous response, dated 16 April 2025. In this we advised that a detailed pre-determination archaeological evaluation of the site is required to understand the survival and significance of the surviving below-ground archaeology, in order to understand the potential impacts of the scheme. In the absence of this, there is insufficient information to meet the requirements of para. 207 of the NPPF or Policy HE2 of the City Plan 2040. There is potential for this application to cause substantial harm to a highly significant archaeological site spanning centuries; the level of harm caused and significance of the site cannot be understood without an expert on-site evaluation.

While the applicants have provided additional information on the above-ground impacts on the setting of nearby heritage assets, no archaeological assessment of the site has been undertaken, as previously recommended by the CBA and GLAAS.

As such, we maintain our previous objection to the scheme. If an archaeological evaluation of the site which permits an understanding of the probable surviving archaeology on site is not provided, we recommend that this application be refused.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

We would be grateful if these comments could be uploaded to the planning portal.

Kind Regards,
Dr Alison Edwards
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications –notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021.**

Alison Edwards
[she/her]
Listed Building Caseworker / JCNAS database coordinator

Please note my normal working days are Monday-Thursday

www.archaeologyuk.org
De Grey House | St Leonard's Place | York | YO1 7HE
01904 671417



Event registration for the 2025 Festival of Archaeology is now open.
Click here for more information
Explore our Organisers Area here

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From: [redacted]
Sent: 17 June 2025 12:35
To: Grierson, John <[redacted]
Subject: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

17 June 2025

Our DTS Ref: 77421
Your Ref: 25/00223/FULEIA - revise response

Dear Sir/Madam,

Re: 63, ST MARY AXE, LONDON, EC3A 8AA

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to

ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.

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.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Email: [redacted]

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

From: lauren underwood [redacted]
Sent: 17 June 2025 15:04
To: Grierson, John [redacted]
Subject: RE: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Hi John,

That's correct, the supplementary comments heading should have nothing underneath. What came through from our system should look like the below:-

Dear Sir/Madam,

Re: 63, ST MARY AXE, LONDON, EC3A 8AA

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

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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.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Supplementary Comments:

Yours faithfully,
Development Planning Department

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

I hope that helps

Lauren Underwood
Regional Development Manager (London)
Development Planning Team
Asset Management & Engineering
[redacted]
Maple Lodge Sewage Treatment Works, Denham Way, Rickmansworth, WD3 9SQ

Thames Water
It's everyone's water
Working schedule: Mon, Tues Fri 8am-5:30pm. Wed & Thurs 9:30am - 2:30pm

---

From: Grierson, John [redacted]
Sent: 17 June 2025 14:59
To: lauren underwood [redacted]
Subject: Fw: 3rd Party Planning Application - 25/00223/FULEIA - revise response

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Hi Lauren,

Just to clarify as the applicant has queried - there aren't supposed to be any additional supplementary comments as this section was blank on the response?

Kind regards,

John

John Grierson MRTPI | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
Email [redacted] | Mob [redacted] | Website: www.cityoflondon.gov.uk

RTPI Chartered Town Planner

Katie Stewart – Executive Director Environment



Any advice given in this email is provided in good faith and represents the informal opinion of an officer and is not necessarily that of the City of London Corporation.

From: Eleanor Hulm <[redacted]>
Sent: 17 June 2025 14:55
To: Grierson, John <[redacted]>
Cc: McBirney, Georgia <[redacted]>; Tastsoglou, Anna <[redacted]>
Subject: RE: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Hi John

Many thanks for the below.

Can I take it that there no objection from Thames Water and nothing further required at this stage prior to committee due to detail that can be conditioned?

It appears that a section is missing on supplementary comments?

Best
Eleanor

Eleanor Hulm
Senior Planner
mobile: [redacted]
e-mail: [redacted]
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: 020 7004 1700 website: www.dp9.co.uk

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From: Grierson, John <[redacted]>
Sent: 17 June 2025 12:37
To: Eleanor Hulm <[redacted]>
Cc: McBirney, Georgia <[redacted]>; Tastsoglou, Anna [redacted]
Subject: Fw: 3rd Party Planning Application - 25/00223/FULEIA - revise response

Hi Eleanor,

Please see below an updated response from TW.

Kind regards,

John

John Grierson MRTPI | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
Email [redacted] | Mob [redacted] | Website: www.cityoflondon.gov.uk

RTPI Chartered Town Planner

Katie Stewart – Executive Director Environment



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From: [redacted]
Sent: 17 June 2025 12:35
To: Grierson, John <[redacted]>
Subject: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

17 June 2025

Our DTS Ref: 77421
Your Ref: 25/00223/FULEIA - revise response

Dear Sir/Madam,

Re: 63, ST MARY AXE, LONDON, EC3A 8AA

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.

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.

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There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
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

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From:	Rohan Thakkar
To:	PLN - Comments
Cc:	McBirney, Georgia
Subject:	Re: Concerns Regarding Proposed Development at 36 St Mary Axe
Date:	19 March 2025 10:46:43

THIS IS AN EXTERNAL EMAIL

Dear Shupi,

Yes of course, my full address is

80 Houndsditch
Flat 3208
London EC3A7AB

Can you advise next steps regarding the planning application and where the process is? Would it be helpful to our objection to get a similar email from the other residents?

Thank you.

On Wed, Mar 19, 2025 at 10:43 AM PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

> Dear Rohan Thakkar,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**
>
> **Shupi Begum**
>
> **Planning Administrator|Development Division**
> City of London Corporation | Environment Department | Guildhall | London | EC2V

7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Rohan Thakkar [redacted]
Sent: 12 March 2025 11:10
To: Pln - CC - Development Dc <PLNDev@int.cityoflondon.gov.uk>; Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Concerns Regarding Proposed Development at 36 St Mary Axe

Some people who received this message don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Good morning,

I hope this email finds you well. I am writing to express my concerns, along with those of other local residents, regarding the proposed development at 36 St Mary Axe and its potential impact on our daily lives.

As residents of the area, including those residing at the Pan Pacific Hotel and Residences, we are particularly concerned about the loss of light, privacy, increased noise levels, and overall disruption that this project may bring to the neighborhood. Given the scale of the proposed development, we believe it is crucial to assess its implications on both residential and hotel communities in the vicinity.

We would appreciate your guidance on the following:

1. Public Consultation Status: Could you confirm whether the application has now been published for public consultation? If so, could you provide details on the timeline for submitting comments?
2. Engagement Process: How can we formally communicate our concerns to the planning team? Is there an upcoming meeting, consultation, or forum where we can raise these issues?
3. Impact Assessments: Has a thorough daylight/sunlight, noise, and environmental impact assessment been conducted? If so, we would appreciate access to these reports to better understand how this development will affect the surrounding area.

We would welcome the opportunity to discuss this matter further and ensure that the views of local residents and businesses are considered in the decision-making process. Please let us know the best way to engage with the planning team and any next steps we should take.

Thank you for your time, and we look forward to your response.

Best regards,
Rohan Thakkar

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Comments for Planning Application 25/00223/FULEIA

Application Summary

Application Number: 25/00223/FULEIA
Address: 63 St Mary Axe London EC3A 8AA
Proposal: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. |cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118
Case Officer: Georgia McBirney

Customer Details

Name: Mrs Daniella Wax
Address: 80 Houndsditch London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:We currently enjoy a comfortable living conditions at 80 Houndsditch with privacy and and plenty of light available.
The plans proposed will destroy this as we will be overlooked by the new building which is proposed to have a roof terrace on levels 27-29 of 63 St Mary Axe which correspond with approximately floors 31-34 of the Pan Pacific. We live on floor 28.
The new building will be uncomfortably close to our living space windows and further more, the roof terraces will also provide views into the apartment.
The proximity of the proposed building will make our apartment feel hemmed in on three sides destroying our views which are aesthetically pleasing. The new building will create an uncomfortable sense of enclosure.
We strongly object to the planned building works.

EVERSHEDS SUTHERLAND

Eversheds Sutherland (International) LLP
One Wood Street
London
EC2V 7WS
United Kingdom

T: +44 20 7497 9797
F: +44 20 7919 4919
DX 154280 Cheapside 8

eversheds-sutherland.com

Private and Confidential
For Addressee Only
Amy Williams
Development Division
Department of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Date: 5 June 2025
Our Ref: 303118.000023
Direct:
Email: [redacted]

By email to PLNComments@cityoflondon.gov.uk and by special delivery

Dear Mrs Williams,

Planning Application 25/00223/FULEIA – Development at 63 St Mary Axe

1. Introduction

1.1 We have been instructed by The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London to advise in relation to the above planning application.

1.2 AXA REIM ("The Applicant") is seeking detailed planning permission for the proposed redevelopment of an area of land ('the Site') located at 63 St Mary Axe and Camomile Court (23 Camomile Street). The scheme proposal for the Site (hereafter referred to as the 'Proposed Development'), for which planning permission is sought, comprises:

"Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; ancillary plant, servicing and parking and other associated works."

1.3 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the Site:

(a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;

(b) 33 Great St Helens;

(c) 52-68 and 88 Bishopsgate;

(d) 12/20 Camomile Street;

(e) 25-51 (odd), 61 St Mary Axe; and

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(f) 7-11 Wrestlers Court.

1.4 The Site is bounded by Houndsditch to the north / north-east, Outwich Street to the north / north-west, beyond which lies the Salesforce Tower, and importantly, for our client, St Mary Axe, to the east and south-east; and Camomile Street to the south and west.

1.5 We have undertaken an initial review of the above planning application and we have substantive concerns as to the potentially adverse effect the Proposed Development could have on the levels of available light to our client's properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.

2. Daylight and Sunlight Impacts

2.1 Trium Environmental Consulting LLP prepared the Environmental Statement ('ES') pursuant to the planning application. Chapter 8, Daylight, Sunlight and Overshadowing, Light Trespass and Solar Glare of the ES submitted with the application purports to assess the key impacts associated with the Proposed Development once completed in relation to

> Changes to the quantity of daylight and sunlight experienced by sensitive receptors in the proximity to the Site;
>
> Changes to the amount of overshadowing at amenity areas surrounding the Site;
>
> The potential for light trespass from the proposed commercial uses at surrounding sensitive receptors; and
>
> The potential for solar glare to surrounding road viewpoints.

2.2 It is noted in this Chapter that the existing baseline for the assessment was determined by undertaking a review of the Site and surrounding land uses, achieved via data sources from the Council and Google Maps. In paragraph 8.2, the buildings which were identified as sensitive receptors, were selected based on the criteria, identified in the BRE Guidance, where, " if the angle to the horizontal subtended by a new development, at the level of the centre of the lowest window of a neighbouring property is less than 25°, then it is unlikely to be affected by the Proposed Development. Therefore, those sensitive receptors which intersect with the 25° angle planes have been assessed in the baseline condition". Although the Applicant has made reference to the BRE Guidance, we would query whether this is sufficient in the context of the Proposed Development and the nature of the sensitive receptors in close proximity to the Site.

2.3 Three scenarios are assessed and reported on in Chapter 8, the Existing Baseline Scenario, the Proposed Development Scenario and the Cumulative Scenario. However, solar glare and light trespass were omitted from consideration of the baseline scenario on the basis that "The light trespass analysis and solar glare analysis are not comparative assessments, i.e. the occurrence of light trespass in the baseline condition would not justify the occurrence of light trespass from the Proposed Development. The current and evolved baseline are, therefore, not relevant with respect to the light trespass". Solar glare and light trespass assessments were also not considered in the Proposed Development Scenario and the Cumulative Scenario.

2.4 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") (Schedule 4) requires a description of the current state

of the current environment being the Existing Baseline and the identification of significance effects as a result of a new development:-

A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. (Regulation 18(3), Schedule 4, Section 3, the EIA Regulations)

2.5 While Chapter 8 provides an assessment of the baseline conditions, it is surprising that the buildings in surrounding areas, namely Camomile Street, are not considered in more detail. Room layouts were considered to assess No Sky Line (NSL) criteria, however only two properties were selected, 80 Houndsditch and 16 New Street – Tapestry Building (Paragraph 8.53). This is a significant limitation, given the impact of the Proposed Development on the daylight distribution and potential reduction of that daylight distribution on existing buildings, and there is no justification for acquiring data from these properties only.

2.6 In paragraph 8.60 the methodology for defining effects, receptors and receptor sensitivity for daylight and sunlight is discussed. It is noted that "existing surrounding residential properties (i.e. receptors) are considered highly sensitive to daylight and sunlight levels, specifically habitable rooms" and accordingly, all existing residential receptors assessed within the ES are considered highly sensitive, but commercial buildings have "not been assessed as they are not typically considered to have a reasonable expectation of daylight" this is despite the BRE Guidelines (2022) advising that the guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight.

2.7 In paragraph 8.88 it is acknowledged that the baseline considers the existing daylight and sunlight conditions at neighbouring residential properties, with the potential to be affected by the Proposed Development, however, again, a full definitive list of properties is not provided. It is also acknowledged that sensitive receptors that are in close proximity to the Site, but their views are "obstructed or otherwise shielded" and are therefore excluded from the assessment, examples are give, Bevis Marks Synagogue, but again a full list of excluded properties is not provided.

Baseline, Daylight and Sunlight results

2.8 The results assessing Vertical Sky Component (VSC) show that out of 787 windows assessed, only 175 (22.2%) would meet BRE's criteria in the Baseline condition. For No Sky Line (NSL), of the 216 rooms assessed, only 130 (60.2%) would meet BRE's criteria in the Baseline condition. For sunlight of the 634 windows assessed, 310 (48.2%) windows assessed would meet BRE's criteria in the Baseline condition.

2.9 The Map at Figure 8.1, showing Daylight, Sunlight and Light Trespass Receptors in the areas surrounding the Site, is not in high definition so it is not possible to see exactly where the sensitive receptors are located. Table 8.5 however, does show that addresses in which our client owns properties, including Bishopsgate and St Marys Axe, which is listed as having a High Sensitivity to Daylight and Sunlight, Overshadowing, Light Trespass and Solar Glare, yet limited analysis appears to have been undertaken (or made available) in respect of the specific properties in these areas. It is therefore not entirely clear what specific baseline information has been compiled and assessed in respect of our client's properties, and thus how this is then affected by the Proposed Development.

EVERSHEDS SUTHERLAND

Completed Development

2.10 Only 6 properties (identified as sensitive receptors) have been assessed for daylight, and out of the 787 total windows in these receptors assessed for VSC, only 393 (49.9%) would meet the BRE criteria.

2.11 In assessing the future environment, the Chapter concludes at 8.214 that out of the 6 properties assessed, 3 would experience an overall negligible effect, one minor adverse and one property would experience a major adverse significant affect. For sunlight, the same 6 properties were assessed. We would like to reiterate that this limited sample (6 properties) is small and may not provide a sufficiently accurate representation of the full impact of the Proposed Development. Moreover, we are not able to appreciate the specific impacts of the Proposed development on our client's properties.

2.12 We have yet to conclude our detailed impact assessment of other aspects of the Proposed Development and reserve our position in relation to these issues. We do, however, have serious concerns that our client's properties could experience a significant adverse impact as a result of the construction of another tall building in this area. The Environmental Statement simply does not provide sufficient detail, to enable our client to confirm and appreciate whether the impact of the Proposed Development on their properties in the surrounding area have been fully scrutinised and assessed.

For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.

Yours faithfully

[redacted]

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP

Committee:	**Date:**
Planning Applications Sub Committee	8th July 2025
Subject: 85 Gracechurch Street, EC3V 0AA Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.	**Public**
Ward: Langbourn	**For Decision**
Registered No: 25/00433/FULEIA	**Registered on:** 27th March 2025
Conservation Area: Leadenhall Market	**Listed Building:** No

Summary

The application relates to a site located at the northern end of Gracechurch Street, bounded by Gracechurch Street to the west, the New Moon Public House to the north, Bulls Head Passage to the south, and Leadenhall Market to the north and east. The site is located within the Leadenhall Market Conservation Area, and there are a number of other designated heritage assets in the surrounding area, including Leadenhall Market itself (Grade II*), St Michael Cornhill (Grade I), St Peter Upon Cornhill (Grade I), Lloyds Building (Grade I), Nos. 12 & 14-19 Leadenhall Street (Grade II), Nos. 81-82 Gracechurch Street (Grade II), Former Ship Tavern, Lime Street (Grade II), Nos. 7-9 Gracechurch Street (Grade II). Heritage assets in the wider area, including the Tower of London World Heritage Site, are detailed within the relevant sections of the main body of this report.

Planning permission is sought for phased development comprising: demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a),

Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. The development has a maximum height of 147.9m above ordnance datum (AOD) and would be 31 storeys high inclusive of plant levels.

An associated listed building consent application has submitted for partial demolition and reconstruction works to the party walls between 83-87 Gracechurch Street, 81-82 Gracechurch Street, and Leadenhall Market, stabilisation of retained sections and integration of the party wall to the proposed Development at 83-87 Gracechurch Street, works associated with the development of the application site.

An Environmental Statement accompanies this scheme.

Objections were received from statutory consultees including Historic England and the City of London Conservation Area Advisory Committee ("CAAC") in relation to the overall scale and height of the development which they consider to harm the Conservation Area and nearby listed buildings.

Objections were received from nearby residents, related to the noise, and health and safety risks during construction, and the scale of the proposal within the Conservation Area.

The representations received are set out in the main body of the report and are also included in full in the background papers.

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.

The proposal provides a significant increase in office floorspace – an uplift of c. 24,000 sqm delivering approximately 1.5% 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 between 1,700 and 2,205 full-time equivalent (FTA) jobs, an

uplift of 1,260 to 1,630 FTE jobs. Additionally, the lower floors are designed to be capable of being taken up by SME or flexible working operators while the upper floors provide larger more regular floor plates suitable for a range of office occupiers.

It is considered that the proposal would deliver a compelling new cultural and exhibition offer for the City that would align with the Destination City agenda, comprising the exhibition space for the nationally significant archaeological find of the first Roman forum-basilica of London, the new Public Hall, and Heritage Walkway at level 05. The proposals would attract new audiences, alongside the provision of a new route through to Leadenhall Market. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City.

The architectural design approach has been amended through the planning process to consider options and strike the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. 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 CoL and wider CAZ.

The plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some harm has been found to be caused to a number of heritage assets (addressed in detail within this report), this harm has been minimised and mitigated through design and it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies.

The proposal would optimise the use of land, delivering high quality office space, and a substantial proportion of publicly accessible space which includes public access and exhibition of what is a nationally significant archaeological find in the Roman forum-basilica remains. c.

The proposal would preserve the ability to recognise and appreciate the Tower of London (“ToL”) as a Strategically Important Landmark, whilst according with the associated

visual management guidance in the London View Management Framework ("LVMF") as it relates to the Outstanding Universal Value ("OUV").

Historic England ("HE") have objected to the application on the basis of harm caused to Leadenhall Market, the Leadenhall Market Conservation area, and to St Michael's Church. In addition, it is acknowledged that HE found 'low' less than substantial harm to the World Heritage Site ("WHS"), also making reference to intrusions in views to St Peter Ad Vincula (NB specific harm is not identified in this instance) and harm to the Bank Conservation Area, albeit it did not object on these grounds and acknowledging this harm is reduced in comparison to the consented scheme. Officers attribute considerable importance and substantial weight to the views of HE as the Government's advisor on the conservation of the historic environment. The scale of change in all instances is considered to be between negligible and minor, the magnitude of impact small, in both baseline and in particular in cumulative scenarios. Officers disagree regarding the levels of harm attributed.

In all instances, the proposal is not considered to harm the attributes of the OUV, the authenticity or integrity of the WHS, and to preserve its significance. Therefore, proposal would not harm the significance of the ToL, whether in relation to the WHS or any of the component heritage assets which comprise it.

Concerning the LVMF, the site is in 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. 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. 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 ToL. However, it would be visible from several identified views, in particular the River Prospects.

As per the consented proposals, 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, in accordance with London Plan Policy HC4.

The proposals would preserve the nationally significant remains of the Roman Forum-Basilica in situ, conserve them and reveal them to public view in the form of a bespoke, free to enter exhibition space. This represents a major public benefit of the proposals and conditions are recommended concerning investigation, excavation, evaluation, preservation, basement and foundation design, public engagement, and a management plan. An Archaeological Exhibition Space Management Plan would also be secured via s106 obligation, which will include details on visitor management arrangements and curation of the space. 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 with regards to archaeology.

A low level of less than substantial harm is found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I).

The harms, enhancements and public benefits are considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the conclusion of this report.

Giving considerable importance and weight to the desirability of preserving the significance and setting of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits detailed within this report, including the positive contribution the scheme would make to the core and unique character of the City Cluster, while the public benefits include the delivery of growth in a highly sustainable location, the unique offer of a highly compelling mix of cultural spaces across the lower levels of the proposal and public realm improvements. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.

In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Cycle parking and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. A lower quantum of cycle parking has been accepted in this instance given the unique nature of the site, where tall buildings would typically by serviced via extensive

basements which are limited in the context of the need to preserve and exhibit the nationally significant archaeological finds at the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistics guidance. The building is proposed to be serviced overnight using the Public Hall, with details of the delivery and servicing secured by planning obligation. It is considered at this stage that the proposed servicing arrangement would be acceptable.

A carbon options study has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability and avoiding demolition. It concludes that the intended transformation of the site, including making the recently discovered archaeological remains of the Roman basilica publicly accessible, providing highest quality floorspaces with high amenity and wellbeing values and climate resilient design, along with a range of urban greening measures and benefits relating to the activation and diversification of the local area, can only be fully delivered by a redevelopment on this site, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

The proposed development would reach close to the GLA's Standard Benchmark for life-cycle embodied carbon. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for recycling and reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in 18% carbon emissions beyond the Part L baseline, and an estimated low energy use intensity (EUI), as well as targeting a BREEAM "outstanding" rating. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the potential performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, and it cannot avoid demolition in accordance with Policy CS15(3), it complies with (taking account of the mitigation measures proposed) London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2,

CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant.

It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, would be complied with that, notwithstanding the conflicts with CS12 (Historic Environment), CS14(2) (Tall Buildings) DM12.1 (Managing Change affecting all heritage assets and spaces); DM12.2 (Development in conservation areas); Emerging City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets), and London Plan HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

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.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan (such as the proposal before you) without delay.

As discussed within the main report, the paragraph 215 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less that substantial harm.

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

Recommendation

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

(a) The 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); and
(b) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2024 and the application not being called in under section 77 of the Town and Country Planning Act 1990; and
(c) 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) That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.

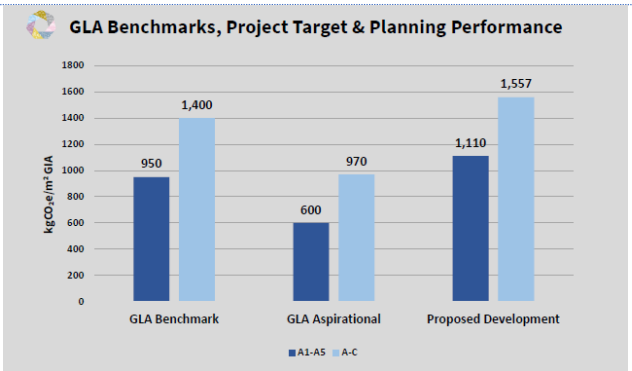
(3) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990.

(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

85 Gracechurch Street

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	57.67m AOD		149.4 m AOD (reduction of 6.3m from consented scheme)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Offices	7671	Offices	34,771
	Retail	364	Flexible Retail	344
			Public Hall	596
			Basement Level Cultural Space	478
			Level 05 Public Cultural Space	136
3. OFFICE PROVISION IN THE CAZ	c. 27,100sqm net additional office floorspace			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	445-615 FTE (estimated)		1,700-2,205 FTE (predicted)	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0
	Cycle long stay	0	Cycle long stay	399 5% accessible Sheffield Stands 10% folding lockers 85% two-tier cycle stands
	Cycle short stay	0	Cycle short stay	43
	Lockers	0	Lockers	2 lockers per 3 long-stay cycle spaces
	Showers	0	Showers	24
	Changing facilities	0	Changing facilities	DDA compliant shower and changing facilities, male and female changing facilities
6. PUBLIC REALM	Opening of public exhibition space dedicated to the display of archaeological artifacts found at the Roman Basilica beneath 85 Gracechurch Street. A new publicly accessible hall connecting Gracechurch Street Lime Street Passage and Leadenhall Market, measuring 596sqm, reinstating a historic public route through the City of London. Heritage walkway at 5th floor level.			

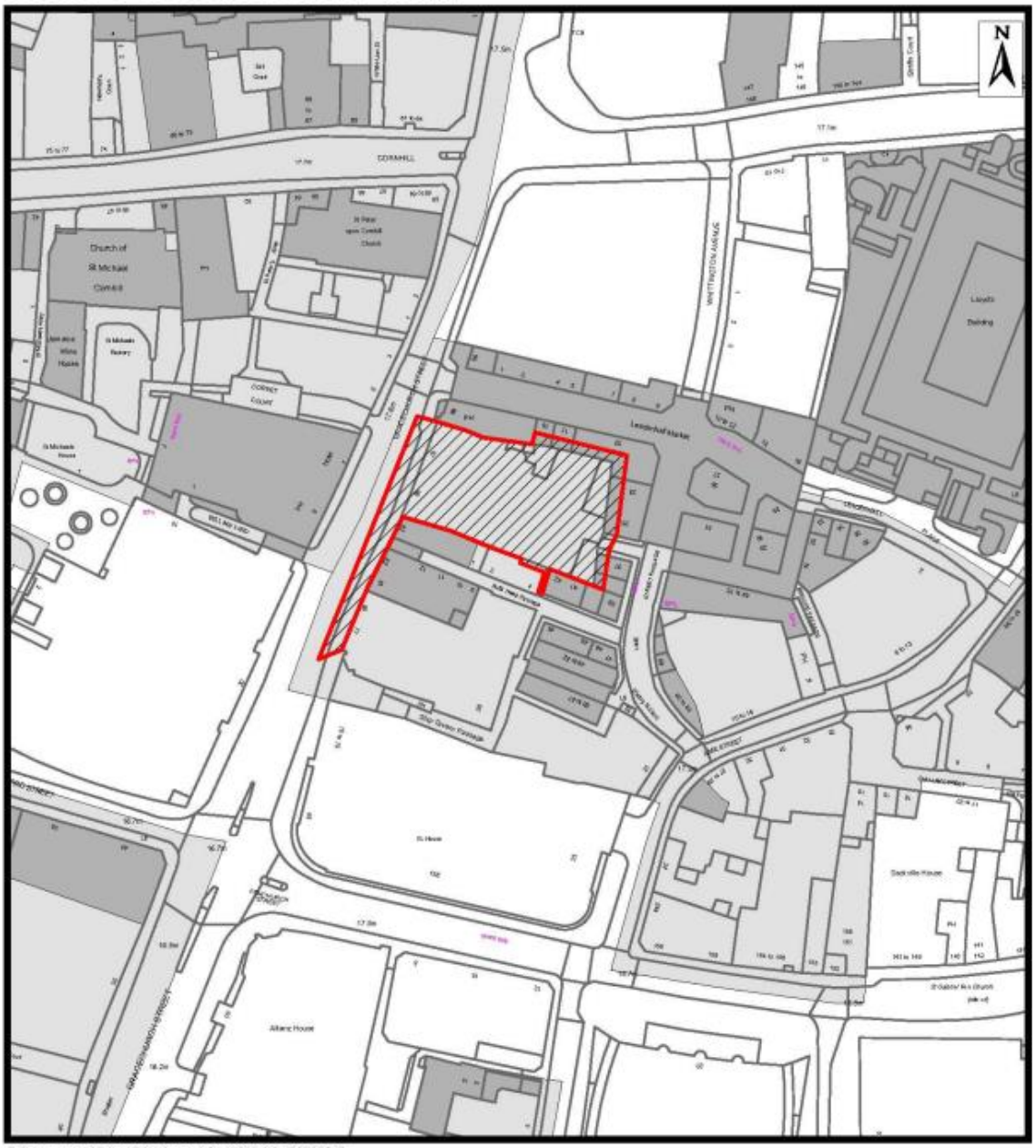
	EXISTING	PROPOSED
7. SERVICING VEHICLE TRIPS	Estimated 17 trips per day	<u>Unconsolidated</u> 84-86 delivery trips per day <u>Consolidated</u> 42-43 delivery trips per day
8. SERVICING HOURS	Servicing vehicles would only be able to access the site between the hours of 11pm-7am to avoid conflict between service vehicles and the general public, with the exception of cargo bikes	
9. OPERATIONAL CARBON EMISSION SAVINGS	Overall improvements against Part L 2021: 18% GLA requirement: 35% Be Lean stage improvements against Part L 2021: 13% GLA Requirement: 15% <u>Be Green stage improvements against Part L 2021: 5%</u>	
10. OPERATIONAL CARBON EMISSIONS	91.9 Tonnes CO2/annual – Part L Regulated 2,757 tonnes/CO2 over 30 years – Part L Regulated	
11. EMBODIED CARBON EMISSIONS	 • Upfront embodied carbon: 1,110 kgCO2e/m2 GIA (A1-A5) • Life Cycle Embodied Carbon: 1,557 kgCO2e/m2 GIA (A-C) excluding B6 and B7 (operational)	
12. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)	• Whole Life Carbon Emissions (A-C) including B6&B7: 2,104 kgCO2e/m2 GIA	

13. CARBON OPTIONS ASSESSMENT - LIFE-CYCLE CARBON EMISSIONS	

	Minor Refurbishment	Major Refurbishment	Major Refurbishment With Extension	New Build
Option Reference	**Option 1**	**Option 2**	**Option 3**	**Option 4**
Project Reference Period	60	60	60	60
Gross Internal Area (m2 GIA)	8,589	8,238	14,105	36,306
Net Internal Areas (m2 NIA)	6,458	Unknown	10,758	23,310
Change in GIA vs. Existing	-	- 351	5,516	27,717
Change in NIA vs. Existing	-	Unknown	4,300	16,852
Substructure % retained by mass	100%	100%	0%	0%
Superstructure % retained by mass	100%	95%	63%	0%
Total WLCA (incl. B6 & pre-demolition) kgCO2e/m2 GIA Module B7 is not considered	**1,125**	**1,168**	**1,411**	**1,898**
Upfront Embodied Carbon excl. sequestration (kgCO2e/m2 GIA)	54	351	662	1,105
In use and End of Life Embodied Carbon excl. B6 & B7 (kgCO2e/m2 GIA)	355	463	485	602
Estimated Whole Building Operational Carbon for building life time (B6) kgCO2e/m2 GIA)	711	347	258	179
Total WLCA (incl B6 & pre-demolition) (tCO2e) Module B7 is not considered	9,659	9,625	19,903	68,896
Total existing building demolition (tCO2e)	43	58	85	436
Upfront Embodied Carbon (A1-A5) (tCO2e)	464	2,892	9,338	40,118
In Use Embodied Carbon (B-C) (tCO2e)	3,049	3,814	6,841	21,856
Operational carbon for building lifetime (B6) (tCO2e)	6,104	2,862	3,640	6,486

14. TARGET BREEAM RATING	Seeks to achieve over 77% of the available water credits Targeting BREEAM rating of “Excellent” in line with policy target with aspiration for “Outstanding”. Aims to achieve a BREEAM targeted score of 87% with a view to a future score of 90%.
15. URBAN GREENING FACTOR	0.33 (GLA calculation), but this increasing to 0.37 when measured using the CoL methodology.
16. AIR QUALITY	Air Quality Neutral and Air Quality Positive assessments submitted, with NRMM and back-up power generation (inter alia) subject to details reserved by condition.

Site Location Plan



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ADDRESS:
85 Gracechurch Street

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

Environmental Statement

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

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

3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:

    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 draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the

environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.

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

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

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

Site and Surroundings

8. The site is located towards the northern end of Gracechurch Street, on the east side. It is bounded by Gracechurch Street to the west, the New Moon Public House and Leadenhall Market to the north, Bulls Head Passage to the south and Leadenhall Market to the east.

9. The red line boundary of the proposed development includes public realm proposals for improved and widening of footways on the south side of the eastern footway of Gracechurch Street.

10. The existing building was completed in 1934-35. It is 8 storeys high with 2 basements and comprises 364 sq.m (GIA) retail and 7,671 sq.m (GIA) offices (Total 8,035 sq.m)

11. Residential properties at: 4 Bulls Head passage lie to the south, at the Publican's Flat New Moon Public House to the north, Jamaica Buildings to the west and at 14 Lime Street to the east of the site. The site is in the Leadenhall Market Conservation Area.

12. There are a number of designated heritage assets in the immediate vicinity of the site. These include:

- Leadenhall Market Conservation Area
- Leadenhall Market (grade II*)
- St Michael Cornhill (grade I)
- St Peter Upon Cornhill (grade I)
- Lloyds Building (grade I)
- Nos. 12 & 14-19 Leadenhall Street (grade II)
- Nos. 81-82 Gracechurch Street (grade II)
- Former Ship Tavern, Lime Street (grade II)
- Nos. 7-9 Gracechurch Street (grade II)

13. Other designated heritage assets in the wider setting include: Tower of London World Heritage Site incorporating the Chapel Royal of St Peter ad Vincula (grade I), The Monument (grade I), Southwark Cathedral (grade I), Cannon Street Towers (grade II), Former PLA Building (grade II*, Lloyds Bank, 39 Threadneedle Street (grade II), Royal Exchange (grade I), 1 Cornhill (grade II), 13-14, 23-27, 28-30, 33-35, 39, 48, 50 Cornhill (grade II) and 15-22 Cornhill (grade II*), 39-40 Lombard Street (grade II), St Paul's Cathedral (grade II), No. 37 & 39 Lime Street (grade II), 7 & 9 Bishopsgate and The Royal Bank of Scotland (grade II), 2a Eastcheap (grade II), 7-8 Philpot Lane (grade II*), 23 and 25 Eastcheap, (grade II)
14. St Mary Woolnoth (grade I), and the Bank Conservation Area.

15. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

16. Planning permission was granted in March 2023 for the following development:

17. Partial demolition of existing building (Gracechurch Street frontage adapted) and the erection of a 32 storey (155.70m AOD) building plus basement levels including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); and Heritage Garden and Cultural Space at level 5 (sui generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

18. The consented scheme is a material consideration when considered the application subject to this report. The current proposals are a further iteration of the design of the consented scheme, the necessity of which has been caused by the find of in-situ remains of London's first Roman forum-basilica, a 2,000-year-old structure of national significance, the remaining extent of which was greater than anticipated prior to archaeological investigations.

19. The alterations to the scheme have included extensive changes to the basement design, given the consented four levels of basement in the consented scheme could not be achieved while preserving or exhibiting the archaeological finds, and this has resulted in alterations across the building as a result of the structure work necessary to bring the building to ground while preserving the archaeological remains. The proposal subject to this application is the subject of a full planning application, and associated application for listed building consent, and is assessed on its own merits in the remainder of this report. Nevertheless, the extant consent represents a material consideration.

20. An application for listed building consent has been submitted (reference number 25/00548/LBC) for those works necessary to facilitate the proposed development. This application is currently under consideration.

Proposals

21. Planning permission is sought for:

22. Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

23. The scheme would provide 36,325sq. M GIA floorspace comprising:
    - 34,771 sq.m of office floorspace;
    - 344 sq.m of flexible retail;
    - 596 sq.m of public hall;
    - 478 sq.m of cultural space at basement level; and

- 136 sq.m of public cultural space at level 05.

24. The proposed scheme reaches a maximum height of 147.9m AOD (Above Ordnance Datum) and would be 31 storeys in total height (inclusive of plant) and include two basement levels. The proposal is formed of a base rising from ground floor to level 05, with a tower element rising above. The base fronts Gracechurch Street, with the proposed facade reconstructed in a style referencing the original 1930's facade, with minor modifications with regards to the previously present fenestration and columns. The proposal includes a ground floor public passageway formed from the existing central portal entrance onto Gracehcurch Street and would provide a new public route from Gracechurch Street into Leadenhall Market and on to Lime Street Passage.

25. The proposed development would predominantly be in office use, with a Public Hall at ground floor, a Heritage Walkway at fifth floor level and areas of flexible retail use at ground and first floor levels. The scheme provides a significant increase in office floorspace and an increase in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses, with flexible Grade A office floorspace above.

26. At ground floor level, the Public Hall would be flexible in use, it is designed to be a complimentary extension to Leadenhall Market, providing civic, event and market space to be used for food kiosks, market stalls and cultural activities such as film screening and exhibitions. It has been designed to be as flexible as possible.

27. At basement level, a public exhibition space is proposed accessed via lift and staircase from ground floor level. This exhibition space, with London Museum as content partner, includes seminar or education spaces, and the exhibition of the remains of London's first Roman forum-basilica in-situ. A Cultural Strategy has been submitted which sets out the intention to include the display of objects including artefacts from the site alongside the use of digital technologies allowing unique and immersive experiences for visitors.

28. The top of the base level, at fifth floor, includes a Heritage Walkway which provides an atractive elevated public space offering unique views across this part of the City, given its proximity to the Grade II* listed Leadenhall Market and its views towards the Grade I listed Lloyds of London, linking together the surrounding context of London through different eras and the Roman forum-basilica at basement level.

29. The proposed scheme would also deliver public realm improvements along Gracechurch Street, where footway widening is proposed, alongside improvements to pavement finishes and kerbs.

30. Above these levels, the lower floors are taken up by end of trip facilities, including shower and changing rooms, and cycle parking – principally uses which would have been accommodated at the basement levels in the extant scheme.

31. The tower element of the proposal takes up floors 5 to 29, with levels 5 to 12 tapering outwards to the north east in the buildings chamfered massing, levels 12 to 23 taking up the main body of the building, and with levels 24 to 29 then tapering inwards from the south east corner completing the chamfer of the overall building. The proposed tower includes a roof terrace amenity area for office users.

32. Servicing of the proposed building would take place overnight and within the Public Hall at ground floor level, to avoid conflicts with the public use of this space, and outside of servicing hours the Hall would be publicly accessible.

33. With regards to urban greening, there are extensive landscaping proposals at the site which include greening of the façade, greening at the upper terrace levels in the base of the building, and planting of the roof top amenity space.

Consultation

Statement of Community Involvement

34. The applicants have submitted a Statement of Community Involvement prepared by Kanda, outlining their engagement with stakeholders.
35. A public exhibition took place on the 13th of February 2025 from 12-6pm at 85 Gracechurch Street. 3.18 A total of 73 individuals attended the exhibition.
36. A designed newsletter distributed to 1,232 addresses to promote the consultation.
    - 8 meetings organised with local stakeholders and elected members.
    - An in person drop-in session attended by 73 members of the public.
    - A dedicated consultation website which was visited 257 times by 207 different users across the consultation.

- A geo-targeted social media campaign which secured a reach of 75,531 generating 276,901 impressions and 621 clicks

Statutory Consultation

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

38. Nearby residential occupiers were notified directly of the application by letter on 24th April 2025. The application was advertised in the press on 29th April 2025. Site notices advertising the planning application were posted on 24th April 2025.

39. At the time of publication of this report, one objection letter has been received. A summary of the representations received, and the consultation responses is set out in the table below.

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

Consultation responses	
Air Quality	Recommended conditions.
London Borough of Camden	No objection
City And Hackney Public Health - Suicide Prevention	No comments received.
City Heritage Society	No comments received.
City of London Archaeological Trust	Letter of support received.
City of London's Environmental Health Department	Recommended conditions.
City of Westminster	No comments received.

City Police - General	Meetings were held previously with the applicant, and through liaison with the security consultant the City of London Police's recommendations have been taken into the final design. Security screening, cycle store management, access and escape from the 5th floor public viewing balcony, and the roof space garden terrace should comply with Secure by Design guidance, and balustrades should be considered in line with CoL guidance. Response: Conditions concerning these matters are recommended to be attached.
City Property Advisory Team	No comments received.
Cleansing Services	Waste strategy proposed is acceptable and no objections. Response: Noted.
Commissioner of Police	No comments received.
City of London's City Operations Division - Contract And Drainage Service	Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, this proposal needs to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being; 'Any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water utilities ltd or their contractors.' **Response:** An informative would be attached setting out this advice.
Council For British Archaeology	No comments received.
Counter Terrorist Section	No comments received.
Environment Agency	The Environment Agency (EA) has no objections to the proposed development but has provided advisory comments for consideration.

	The EA recommends that any Non-Road Mobile Machinery (NRMM) used during site preparation, construction, or demolition meets the latest emissions standards (Regulation (EU) 2016/1628), particularly for developments within 2km of an Air Quality Management Area. Such machinery should also be registered for inspection where applicable. The EA encourages the inclusion of water efficiency measures in all new developments, suggesting that non-residential schemes over 1,000 sqm meet the BREEAM 'Excellent' standard for water consumption or equivalent. It is noted that the site lies within 75m of a Medium Combustion Plant regulated by EA. As such, the applicant should consider design or mitigation measures to minimise potential impacts (e.g. noise, odour, emissions) on future occupants. This aligns with paragraph 200 of the NPPF, which seeks to ensure new development integrates effectively with existing permitted uses. The EA requests a copy of the final decision notice for their records. **Response:** Air quality matters are addressed below and via condition, and the use of NRMM would be subject to conditions related to deconstruction and construction logistics.
Greater London Authority	Land Use Provision of office space in the CAZ supported, and cultural exhibition space and other areas of public access strongly supported. Layout and Public Realm Spaciousness, quality and accessibility of the public hall with market stalls is supported. The provision of fifth-floor viewing terrace with direct connection with archaeology, both being publicly accessible, is supported. Scale, Form and Massing The proposed height and mass is similar to the extant consent, however the proposals would be rationalised with a simpler and more elegant form. Changes to the transition from the building on Gracechurch Street to the new building above have resulted in improvements, and are supported.

	Heritage GLA officers consider that the proposed public benefits have the potential to clearly and convincingly outweigh the harm to heritage assets. A final balancing exercise will be undertaken at Stage II once the public benefits package is secured. Transport The cycle parking proposed, including under-provision against full London Plan standards, and some end of journey facilities and short stay cycle parking on upper floors, is considered acceptable due to the constraints of the site. A final Delivery and Servicing (DSP) and Construction Logistics Plans (CLP), and Travel Plan should be appropriately secured. Energy and Carbon Reduction Some matters require resolution prior to the Mayor's decision making stage **Response:** Support for design, scale, massing, and land use are noted, and the heritage conclusions are noted while being referenced in the relevant sections of this report. Noted also that the applicant is currently addressing the energy and carbon reduction matters with GLA officers and this this would need to be agreed prior to conclusion of Stage 2 of the GLA referral process.
Heathrow Safeguarding	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.
Highways	No comments received.
Historic England - GLAAS	The development affects a heritage asset of equivalent significance to a scheduled monument. These are large assets of which only relatively small parts are affected, but the First Forum Tribunal is a key element of the asset, so its loss would, in our view, have amounted to an unacceptably high level of harm. We are very pleased that this loss has been avoided and now consider the overall harm to be a moderate level of less than substantial harm. In our view, this residual harm would be largely offset by significant public benefits from revealing and interpreting the site's significance. Recommended conditions. **Response:** Such conditions are recommended to be attached, and this response is addressed in the relevant section of this report below.
Historic England	Historic England objects to the application because of the harm to the conservation areas and listed buildings that it would cause, and the clear conflict with the Development Plan, given that there is no policy support for a tall building in this location. We additionally raise concerns in relation to the harm to the Tower of London World Heritage Site. 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.

	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, Leadenhall Market Conservation Area, Bank Conservation Area and 85 Gracechurch Street and Principle of Redevelopment.
Historic Royal Palaces	No comments received.
London Borough of Islington Council	No comments received.
Lead Local Flood Authority	No comments received.
Lighting Consultations	No comments received.
London Borough of Greenwich	No objections.
London Borough of Hackney	No comments received.
London Borough Of Southwark	No comments
London Borough of Tower Hamlets	The LPA has no observations to make.
London City Airport	This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's safeguarding criteria.
London Underground	No objection.
Ministry of Housing, Communities and Local Government	No comments received.
NATS Safeguarding Office	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.

SAVE	No comments received.
Society For the Protection of Ancient Buildings	No comments received.
Strategic Transportation Planning	No comments received.
Surveyor To the Fabric of St Paul's	The surveyor has requested the following confirmation: “We note from the submission material that the scheme has been designed to be entirely invisible along the Processional Way. Officers will be well versed in the methodologies and advanced technologies now used to assess the extent of visibility in these kinetic sequences. We request that, due to the sensitivity described above, Officers establish that they are certain that scheme is not visible in this approach – and that even extremely minor visibility, so often called *technical* visibility or impact, is not permitted. We request that this is confirmed for the length and breadth of the Processional Way. **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 the principles established by the consented scheme, 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 been unable to confirm whether there is sufficient capacity for foul and surface water drainage. They request conditions preventing occupation until capacity is confirmed, a phasing plan is agreed, or necessary upgrades are completed. For water supply, current capacity supports only a limited portion of the development (447m² retail space or 1.5 l/s peak flow). Occupation beyond this should be conditional on upgrades or a phasing plan. Additional information including drainage strategies and detailed piling plans is required to discharge these conditions. **Response:**

	A Clean Water Capacity Report has been provided by the applicant, and authored by Thames Water, confirming sufficient capacity for foul and surface water drainage(dated 1st May 2025). Other matters raised are addressed via condition.
The City Surveyor	No comments received.
The Director of Culture, Heritage & Libraries	No comments received.
The District Surveyor - Fire Strategies	No objections.
Transport For London	With the extant consent broadly establishing the acceptability of all transport impacts proposed, with the recent revisions to the scheme being considered relatively minor in strategic transport terms. A package of highway improvements have been agreed, given the proposals impact on the Transport for London Road Network. An s106 obligation is requested for the applicant to enter into a s278 with TfL, with s278 to include an agreed scope of works, a Road Safety Audit, and temporary works to facilitate construction. A condition concerning the submission of a Construction Logistics Plan is recommended. Full public access through the Public Hall should be secured through s106 obligation. Delivery and servicing restrictions should be secured via condition, and should not apply to cargo bikes with the provision of cargo bikes welcomed. The cycle parking proposed, including under-provision against full London Plan standards, and some end of journey facilities and short stay cycle parking on upper floors, is considered acceptable and in sufficient accordance with London Plan policy T5 due to the unique archaeological challenges of the site. The design and delivery of all cycle parking should be secured by condition and discharged in consultation with TfL. The full Delivery and Servicing (DSP) and Construction Logistics Plans (CLP) must be discharged in consultation with TfL as highway authority. **Response:**

	This Response is noted, with conditions attached as recommended.
Twentieth Century Society	No comments received.
Victorian Society	No comments received.

Letters of Representation

Letters of representation – one letter of objection received from the owners/occupiers of 3 surrounding sites	
Residents of 4 Bulls Head Passage	Three residents and owners of Flats A, B and C, 4 Bulls Head Passage objected to this proposal on a number of grounds. Firstly, their flats share a party wall with the proposed development, they state this places the owners in immediate proximity and prompting objections. They are also concerned about significant noise, health risks, and safety issues during construction, which they feel have not been properly addressed in the Health Impact Assessment. A meeting with the developer took place and access was granted to their properties, however, they feel they have received no meaningful assurances regarding protection from construction hazards. They also feel the 32-storey tower is out of character with the historic Leadenhall Market and its conservation area, noting that objections from Historic England and the City of London Conservation Area Advisory Committee remain unresolved. Additionally, they believe the proposal breaches the London Plan and local planning policies, which discourage tall buildings in heritage settings and require harm to heritage assets to be clearly justified. **Response:** Consideration of these impacts are contained in the following sections later in the report: Design and Heritage, Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing.

Freehold owner of 2-4 Bulls Head Passage	Email received 3rd June: The rear of the property overlooks a lightwell and several windows and ventilation openings in the rear wall open onto this lightwell. Drawings show these would be closed during the building work. There is a boundary dispute between the parties. Discussions are ongoing with the applicant – of which amendments would be required to the plans as submitted currently. Request that the applications be brought to Planning Committee after the agreement of revised plans. Letter received 18th June: The submitted proposals occupies the freehold directly up to the freehold boundary, requiring oversailing of our property with a service cradle to allow for window leaning. Such oversail requires our permission, without permission the applicant would trespass our freehold rights. This can easily be avoided, with the developer having a clear choice to set back the building to ensure the cradle would remain within their freehold space. We were not made aware of this oversailing until recently. We have made clear to the developer in writing on 11th June 2025 that we do not grant permission to oversail our freehold and have asserted our rights as freeholders not to be trespassed. It appears that the developers intend in the future to rely upon the Access to Neighbouring Land Act 1992 ("The Act") to gain access to clean the windows once the building has been completed. However the Act cannot be used either to build a new property or for later access to service such a property. Planning permission should not generally be granted for applications where Building Regulations cannot be met, the planning application should either be rejected or put on hold till the Developers are able to amend their application so that they can show that they can meet the Building Regulations. Response: Consideration of these impacts are contained in the following sections later in the report: Design and Heritage, Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing. Where matters above are not material planning considerations, these are addressed following this table.

City of London's Conservation Area Advisory Committee (CAAC)	They welcome the slight reduction in height of the proposed building, the greening and the improved heritage offer. The Committee reiterated its objection considering that this proposal represented a significant overdevelopment of a constrained and sensitive site. Members agreed that there would be substantial loss of character in the Leadenhall Market Conservation Area and damage to the setting of nearby listed buildings. Whilst acknowledging the benefits to the Leadenhall Market and the area more generally in increasing the public realm and making provision for heritage display and interpretation on this site, the Committee was unanimous in its view that these benefits did not outweigh the serious damage to the character and appearance of the Conservation Area that would result. **Response to comments:** consideration of the impacts identified in the City of London Conservation Area Advisory Committees response is contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, 26 Leadenhall Market Conservation Area and 85 Gracechurch Street, Principle of Redevelopment.

Support

41. Letters of support have been received from the London Museum, and setting out their support for their partnership with the applicant and their engagement since the granting of planning permission in 2023, and their enthusiasm for a long-term partnership with the applicant in providing consultancy as to the in-situ exhibition at basement level and the heritage walkway at 5th floor level (subject to further agreement).

42. A letter from support has also been received from the City of London Archaeological Trust. The Trust encourage all procedures to be adopted during construction as advised by Historic England, while praising the proposed presentation of the archaeological finds as laid out in the submitted 'Cultural Vision' document. Additionally, a letter ofsupport has been received from the EC BID.

43. Not all the representations above are material planning considerations. Specifically, where the representations from neighbouring properties make references to freehold rights and oversailing rights the grant of planning permission does not confer any private rights and any such right necessary to build and operate the building would need to be gained by the applicant. It is not a requirement of planning that such rights be gained prior to the grant of planning permission. It is not a requirement of planning that such rights be gained prior to the grant of planning permission. Those matters that are material considerations have been dealt with in this report.

Policy Context

44. 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.

45. 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 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.

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

47. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 (as amended in February 2025) and the Planning Practice Guidance (PPG) which is amended from time to time.

48. 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”.

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

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

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

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

- the application of policies in this Framework that protect areas or assets of particular importance provides a 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. [Footnote 9: The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.]

51. 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).

52. 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.

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

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

55. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lives, through promoting good health and preventing ill-health.

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

57. 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.

58. 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.

59. 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.

60. 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".

61. Paragraph 125(c) provides that planning policies and decisions should "give 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".

62. 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."

63. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing with a high standard of amenity for existing and future users.

64. 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...'

65. 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.

66. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. 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 the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

67. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems and help to reduce greenhouse gas emissions, such as through its location, orientation and design.

68. 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.

69. 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.

70. 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."

71. 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".

72. 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.

73. 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".

74. 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".

75. Paragraph 219 of the NPPF states "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

76. Paragraph 219 of the NPPF states "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

Statutory Duties

77. 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).

78. 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).

79. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

Main Considerations

80. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation

responses, in addition to the development plan, and other material considerations including SPGs, SPDs and emerging policy.

81. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

82. The principal issues in considering this application are:

- The principle of development;
- The appropriateness of the proposed uses, including the new cultural offer;
- The appropriateness of a tall building on site;
- The appropriateness of the architecture, urban design, and the new public realm;
- The impact of the proposal on the Tower of London World Heritage Site;
- The impact on strategic views in the London Views Management Framework and on other strategic local views;
- The impacts of the proposal on the setting and significance of heritage assets;
- The acceptability of the proposed highway and transportation arrangements including servicing, cycle parking provision and impact on highways;
- The acceptability of the scheme in terms of its environmental effects including wind microclimate, daylight and sunlight, overshadowing, solar glare, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability, urban greening, overheating, and flood risk;
- The potential impacts of the development on buried archaeology;
- The acceptability of the proposal in accessibility terms;
- Acceptability of the proposed security, suicide prevention and fire safety arrangements;
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan, including the paragraph 215 balancing exercise;
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act; and
- The requirement for financial contributions and other planning obligations

Principle of Development and Economic Considerations

83. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity, and significant weight on the need to support economic growth and productivity, taking

into account both local business needs and wider opportunities for development. Significant weight is given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to economic benefits will depend on the nature and extent of those benefits in light of other planning considerations.

84. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.

85. 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 officebased 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.

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

87. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local

business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

88. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace is therefore required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

89. 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.

90. 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 wellconnected 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 placemaking, strengthening London's distinct and varied character.

91. 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.

92. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

93. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

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

95. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy and enhancing the City's evening and weekend economies; creating new and enhanced culture, leisure and visitor attractions; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces; delivering new, inclusive open spaces and enhancing the City's public realm for everyone; delivering urban greening and greater biodiversity; and creating an inclusive, healthier and safer City for everyone.

96. The emerging City Plan (2040) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and

flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

97. 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.

98. 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.

99. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are further reflected in the Corporations 'Destination City' vision for the square mile.

100. The proposed scheme would help deliver the City's strategic objectives and support the City's economic role by providing a substantial and strategic contribution of flexible Class E (office) floor space alongside a complementary retail and cultural offer and new public realm. The principle of development has also been demonstrated through the extant permission at the site, as set out in the relevant section above.

Land Uses

101. The proposed building predominantly provides office use (Class E), with a Public Hall (Sui Generis) at ground floor, and a Heritage Garden and Cultural Space (Sui Generis) at fifth floor which provides amenity for City workers, residents and visitors, and areas of flexible retail use (Class E(a), E(b), drinking establishment (Sui Generis) and hot food takeaway (Sui Generis) at ground, first and fifth floor. The proposed uses are set out as below:

Land Use	Use Class	GIA (m2)
Office Space	E (g) (i)	34,771
Retail	E (a), E(b),	344
Public Hall	Sui Generis	596
Basement Cultural Space	Sui Generis	478
Level 05 Heritage Walkway	Sui Generis	136
Total		36,325

102. The following sections of the report provided an assessment of these proposed uses in turn.

Provision of Office Accommodation

103. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

104. The predominant use of the proposed development is office space, comprising of 34,771 sq.m (GIA) of Commercial/Office Floorspace Class E(g). The office space is classified as best-in-class, Grade A office space.

105. 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 at least 1.2 million sqm net of new office floorspace in the period between 2021 and 2040.

106. As well as being considered Grade A office space, the proposed office space would contribute to the operational decarbonisation of the City's stock of office floorspace, as detailed further in the assessment of the sustainability credentials of the proposed scheme in the latter sections of this report. The proposed development is estimated to accommodate between 1,700 and 2,205 full-time equivalent (FTA) jobs, an uplift of 1,260 to 1,630 FTE jobs. Further, the lower floors are designed to be capable of being taken up by SME or flexible working operators while the upper floors provide larger more regular floor plates suitable for a range of office occupiers. Alongside is provision of a range of interior and exterior environment amenity and floor area, the proposal is considered in accordance with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

107. 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 Space

108. Policy DM 1.5 encourages 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 supported by policy OF1 of the emerging City Plan.

109. The application site is located within the designated Leadenhall Market Principal Shopping Centre (PSC) as set out in the Local Plan (2015). The existing site contains 364sq.m of retail floorspace including a health and wellness (Holland & Barrett) retail unit and a healthy food to go chain retail unit occupied by Pure. The proposed works to this site would provide market-style retail uses (Class E and Sui Generis) floorspace, within

the Public Hall, amounting to an uplift in retail floorspace. An exemplary level of activity is provided at ground floor level, complementing the nearby Leadenhall Market, through the provision of an east-west through-route within the Public Hall. It is envisaged retail provision would be provided in the Public Hall areas including pop-up/'micro-retail' retail spaces such as stalls and kiosks which would enliven the public realm in this location and enable public events to take place which would activate the frontages of the building. Leadenhall Market is located adjacent which in recent years is underperforming however the addition of this proposed development through wider range of multi-use spaces and activities of a cultural and retail nature would encourage footfall and retain a higher proportion of visitors. The reinstatement of a historic City public route running through the site would enable better access between the traditional retail units within the Victorian Market and the proposed new development.

110. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character. Adopted Local Plan Policies CS20 and DM20.1 prioritise retail uses within PSCs and seek to resist the loss of retail frontage and floorspace. Emerging City Plan policy S5 encourages the continued provision of retail uses in the PSC and complementary uses that provide an active frontage. The proposals are in conformity with both emerging and adopted Local Plan retail policies.

Provision of Cultural Space

Basement and Ground Floor Level

111. 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 including the cultural quarter focused on the Barbican complex, the Guildhall School of Music and Drama, the Guildhall Art Gallery and City Libraries.
- 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.

112. 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.

113. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

114. The submitted Cultural Plan was produced by MOLA, the London Museum and the applicant, setting out the cultural vision for the site and the varied proposed cultural uses within – including the exhibition and public access space concerning the Roman forum-basilica, the proposed Public Hall, and the Heritage Walkway.

Roman Forum-Basilica Exhibition

115. This publicly accessible space at basement level would be an exhibition of the in-situ remains of the Roman forum-basilica, with the London Museum acting as cultural content partner. Spaces dedicated to teaching and seminars, and the display of objects, are to be considered alongside the use of digital technologies allowing unique and immersive experiences for visitors.

Public Hall

116. The Public Hall features a significant east-west public through-route, and double height space, and several levels for public use. The Cultural Strategy sets out a vision which includes opportunities to accommodate a programme of curation which appeals to different audiences and seeks to attract them to the City of London, giving existing examples of such events that could be accommodated and which are regularly held in London (e.g. Lumiere light displays, and visual art fairs).

117. Each space would be the subject of a condition requiring the submission of a Public Access and Management Plan, and s106 obligations requiring management plans would also be required. The spaces are considered substantial benefits of the scheme, and in compliance with Policy CS11 of the Local Plan and emerging City Plan 2040 Policy CV2.

Heritage Walkway

118. Local Plan 2015 policy DM10.3 and draft City Plan 2040 policies S8, S12 and DE4 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.

119. Policy D9 (D) of the London Plan states that 'free to enter publicly accessible area should be incorporated into tall buildings where appropriate'.

120. The Heritage Walkway proposed would comply with these policy aspirations, providing a unique view at level 05. This view is considered an appropriate and attractive public viewing space, given its proximity to the Grade II* listed Leadenhall Market and its views towards the Grade I listed Lloyds of London, linking together the surrounding context of London through different eras and the Roman forum-basilica at basement level. The details of the operation and management of this space would be secured via condition and s106 obligation.

121. The proposals for the elevated public space are in accordance with Local Plan policy DM10.3, draft City Plan 2040 policies S8, S14 and DE4, which seek the delivery of high-quality, publicly accessible elevated viewing spaces.

122. It is considered that the proposal would deliver a compelling new cultural and exhibition offer for the City that would align with the Destination City agenda. The proposals would attract new audiences, alongside the provision of a new route through to Leadenhall Market. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City. Final details of the operation and management of the spaces would be secured through conditions and the S106 agreement through submission of the Viewing Deck Management Plan. The proposal would therefore accord with policy CS11, CS22, DM1.5, DM10.3, DM19.3 and DM22.1 of the Local Plan 2015 and policies CV2, HL5, HL7 and DE4 of the emerging City Plan 2040.

Principle of a Tall Building

123. 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>). With reference to the 'Eastern Cluster' Policy Area in the adopted Local Plan (Policy CS7, fig. G) and in the revised 'City Cluster' Policy Area (emerging Policy S21, fig. 28) in the emerging City Plan 2040, the proposal is located in the City Cluster of tall buildings.

124. For the spatial planning purposes of London Plan Policy D9(B), the application site, due to its location in the Eastern/City Cluster of tall buildings, is in a location identified as suitable for tall buildings in the Development Plan.

125. However, as per the consented scheme, on a site-specific basis, the proposal is in the Leadenhall Market Conservation Area, therefore falling within a localised area that is both within the wider designated tall buildings cluster area and also deemed 'inappropriate for tall buildings' under Local Plan Policy CS14 (because it is in a conservation area). It is recognised that there is a tension between the wording of London Plan Policy D9, which envisages under Part B that locations where tall buildings may be an appropriate form of development will be identified in development plans, and the more dated Local Plan 2015 Policy CS 14 which identifies only areas which are 'inappropriate'.

126. The proposal draws in-principle support from its location in the City Cluster, whilst being located in an inappropriate area as referred to in CS14(2) as it is in a conservation area. In *R (ota LB of Hillingdon) v. Mayor of London* [2021] EWHC 3387 (Admin), the High Court held that London Plan Policy D9(B) was not a pre-condition or 'gateway' to the application of the criteria in D9(C). In other words, even where a proposed tall building falls outside an area identified as suitable in a development plan under Part B, the impacts of the tall building as set out in Part C should still be considered.

127. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report. It is found that the proposal, as per the consented scheme, would satisfy the criteria in (C) and (D), including in relation to Part C (d), finding that it would not harm the significance of the Leadenhall Market Conservation Area.

128. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 but would conflict with Local Plan Policy CS 14(2). This conflict with a Development Plan policy is addressed at the end of the report when considering

whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Impacts of a Tall Building

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

Visual Impacts

130. In relation to London Plan Policy D9(C; 1; i) the impact of the proposals upon the City and wider London skyline in long range views has fundamentally informed the optimisation of site and the overall height and form. The designs have developed the principles established by the consented scheme, 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. It has also been designed to step down from the summit of the emerging City Cluster in strategic riparian views and assisting in assimilating the isolated bulk of 20 Fenchurch Street into a coherent cluster and urban form, in line with the long-term Plan-led approach in which the GLA, CoL and HE have played a significant curatorial role.

131. The top is designed with a flourish offering a pleasingly subtle 'crown' in those wider views. The massing of the tower base includes a set back from the edges at podium level 5, creating a break in the Gracechurch Street elevation in response to the existing parapet line, preserving the character of the principal façade within the conservation area. In relation to D9(C; 1; ii), mid-range views, the proposal relates appropriately to the form and character of the developing Cluster, stepping down in height southwards towards the river from its apex at 22 Bishopsgate/1 Undershaft. In comparison, the proposal is of a more modest height than other existing and consented tall buildings in the Cluster, given here for reference (in descending AOD height order):

- 1 Undershaft: 304.9m
- 22 Bishopsgate: 294.94m
- 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: 160m
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m
- 50 Fenchurch Street: 149.6m

132. The proposal has therefore been designed with the future evolution and consolidation of the Cluster in mind. As such the proposals will be appreciated as in keeping with the evolution of the Cluster, readily identified as part of this group and reinforcing the spatial hierarchy of the local and wider context. Its sculpted, serrated silhouette and elevations of pale masonry and extensive urban greening would give the proposal a distinctive identity on the skyline and create a distinct albeit familial relationship with the predominantly glazed and more formally geometric profiles of its built, emerging, and consented neighbours. (D9 C:1:a:ii, D9 C:1:b).

133. The design response has evolved specifically in reference to identified sensitive townscape viewpoints illustrated within the HTVIA. The principal elevation addresses Gracechurch Street, with the remainder to the rear situated within the medieval street pattern of the Leadenhall Market Conservation Area. The local context therefore exhibits a duality between the compact plots and lower rise buildings within the Conservation Area and the existing towers of the City Cluster, which create an immediate backdrop and wider context experienced alongside the Conservation Area.

134. The sensitive rebuilding of the principal Gracechurch Street elevation ensures its positive contribution to the local street scene is conserved. The solid masonry base and set back of the tower element above, while configured differently from the consent, ensures the relationship of the base with the surrounding built frontages is consistent with the consented scheme, reinforcing the existing datums along Gracechurch Street as well as the contrast with the City Cluster rising above, allowing the scale and character and vitality of the street to be preserved.

135. As above, the creation of a break in the built frontage to Gracechurch Street at level 5, enables a soft green parapet edge as well as a public walkway, viewing terrace and cultural space at roof level overlooking the market. This walkway provides an area of publicly accessible open space available at no charge (D9; D) to be secured in the S106.

A sense of vitality is further promoted with the re-establishment of a historic through-route across the site, with the provision of a Public Hall enhancing a sense of activity at street level (D9 C:1:a:iii). This enhances permeability within the general surroundings and provides the maximum feasible amount of open space. A complete description and assessment of the podium and tower's design is addressed below, and this has been found to be of the highest architectural quality, ambitious in scope and calibre (D9C:1:c).

136. A full assessment of impact with regards to heritage assets, particularly with regard to the Leadenhall Market Conservation Area is outlined in the relevant sections below. The conclusion of this assessment is that the proposed development will result in an overall modest enhancement to the Conservation Area. This assessment has concluded that the proposals will be appreciated as part of a dense, close-knit consolidating backdrop of tall buildings. The visual strength of this existing juxtaposition is such that, while it is acknowledged the proximity of the proposals could feel uneasy in certain views of Leadenhall Market, this would be balanced out by the replacement of poor quality with high quality architecture, nullifying those fleeting incidents with countervailing benefit.

137. Further to this, the following enhancements to the Conservation Area have been identified:

> (i) the rebuilding of the principal historic façade of 85 Gracechurch Street, restoring its decorative quality and enhancing its positive contribution to the character of the streetscape.
> (ii) the reinstatement and reinterpretation of a historic space through the site and (iii) the further activation of the streetscape surrounding the market, amplifying a sense of the historic experiential setting to the market which would have been defined by the bustle of diverse commercial trade and consumption (D9 C:1;d-e).

138. A low level of less than substantial harm has been identified to St Michael Cornhill (grade I listed), and slight levels of less than substantial harm to Tower Bridge (grade I listed) and the Bank Conservation Area. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for this, not least the delivery of an important site in the long-term consolidation of the City Cluster, and that the harm is more than just outweighed by wider public benefits, including heritage benefits, in this instance. Overall, it is considered the proposal would make a positive contribution to the core and unique character of the City Cluster in which it is situated and options were explored as

part of an optimisation exercise to avoid and mitigate harm to heritage, as set out in this report and as part of the prior consent.

139. In accordance with D9 (C; 1; e), the proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, and the ability to appreciate it. This is by reason of its siting within the long-established and consolidating Cluster backdrop, intervening distance and height when viewed from in and around the Tower of London. In accordance with D9 (C; 1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. It would step down towards 20 Fenchurch Street at the 'prow' of the emerging Cluster, which then steps down to preserve the historic scale of the Upper Pool of the Thames, preserving the open quality and views of/along the river, avoiding a strong 'canyon effect' when seen in association with the London Bridge Cluster.

140. In accordance with D9 (C; 1; g), the proposal would not cause adverse reflected glare, addressed elsewhere in this report, in particular due to its modern masonry grid designed to enhance sustainability and prevent solar gain. In accordance with D9 (C; 1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition.

141. The proposal has been assessed in reference to the potential impacts set out at Policy D9 (C; 1) and is considered to accord with that element of the policy.

Functional Impact

142. Through interrogation via the pre-app process the internal and external design and construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants (D9;C;2;a). Similarly the proposals have been assessed and developed from the start of the proposals 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 (D9;C;2;b).

143. Particular care has been taken with regards to the Public Hall, basement archaeology exhibition space, level 5 roof top walk way and office uses so that entrances, access routes and floorspaces have been designed to allow for peak time use, avoiding unacceptable overcrowding or isolation in surroundings (D9;C;2;c). In particular the provision of a Public Hall, archaeology exhibition and hertiage walkway is considered

an ambitious offer which will promote the creation of jobs, services, facilities and economic activity (D9;C;2;e). The proposals have also been thoroughly tested with regards to the capacity of the transport network in the area, proving the existing services are able to provide sufficient access to facilities, services, walking and cycling networks, and public transport for people living or working in the building (D9;C;2;d). No adverse effect has been identified on the operation of London's aviation navigation and the proposals also have been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).

144. It is considered the proposal would meet the functional considerations of Policy D9 (C; 2).

Environmental Impact

145. The proposals have been found to provide safe and suitable levels of wind, daylight and sunlight and temperature conditions will not compromise the comfort and enjoyment of open spaces. The design is considered to ensure safe and comfortable levels of solar glare and solar convergence (D9;3;a). Additionally, the design has given consideration for how the proposals can assist with the dispersal of air pollutants and 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 (D9;3;b-c). It is considered the proposal would meet the environmental considerations of Policy D9 (C; 3).

Public Access

146. The proposal would deliver a new public route and large new Public Hall at ground floor level, and archaeological exhibition at basement, while at fifth floor level the proposal would incorporate a roof top walkway and cultural space. These three offerings would comprise free to enter, publicly-accessible areas and their locations are the optimal ones to unlock (i) vastly improved pedestrian experience and amenity at ground floor level (ii) optimal views at roof level over the Leadenhall Market Conservation Area and of the City Cluster (iv) unique educational and cultural facility showcasing London's Roman civic centre. It is considered that the provision of publicly accessible open space has been optimised in respect of the site's particulars and that the proposal would meet the considerations of Policy D9 (D).

Conclusion

147. Overall it is the view of your Officers that the proposed development accords with London Plan Policy D9, but conflicts with Local Plan Policy CS 14(2).

Architecture, Urban Design and Public Realm

Architecture

148. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth of core CAZ employment and complementary commercial/leisure uses which are at the heart of the strategic delivery function of the City Cluster to accommodate substantial growth in accordance with Policies CS7 and London Plan Policies SD 4, SD5 and E1.

149. The architectural design approach has been amended through the planning process to consider options and strike the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. 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 CoL and wider CAZ. This long term approach has created an emerging and also unique site context, in terms of character, to which the proposal has been designed to respond. Overall, for the reasons set out below, it is considered that the proposal would accord with the design-led approach of London Plan Policies D3 and D8, delivering a design solution making effective use of limited land resources, in accordance with strategic Local Plan Policy CS10 and City Plan Policy S8.

150. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-6: growth which is socially, economically and environmentally inclusive. The site lies on the western edge of the City Cluster, with its principal frontage to Gracechurch Street and the remainder embedded

within the tight-knit, fine-grained medieval street pattern of the Leadenhall Market Conservation Area. It thus has two very distinct local contexts to, as per the consented scheme, this proposal seeks to respond: the matrix of chiefly low-rise buildings on compact plots arranged upon the medieval streets, and, above these, the existing towers of the City Cluster, modelled to form a cohesive Cluster on the City's skyline, which appear as an immediate backdrop against which the Conservation Area is perceived and experienced from ground level. Fundamentally shaped by the local distinctiveness of these two contexts, the proposal would comprise architecture of the highest quality, with outstanding sustainability credentials, be attractive and contextual at numerous scales and would, in the form of the proposed Public Hall at ground floor level and exhibition space at basement level showcasing the London Basilica, over and above the consented scheme, the current proposals would deliver a landmark new civic space in support of Leadenhall Market and of the City's wider 'Destination City' initiative and world class exhibition space. It would resolve the design challenges posed by the site by comprising two main elements: a street-level building or 'podium' with a tower above.

Podium Building

151. The podium would be an outstanding response to the site's local distinctiveness. It would sensitively rebuild the existing 1930s building's Gracechurch Street frontage in approximate facsimile, modified by recessing the existing bronze-coloured windows to give greater depth, introducing new bronze coloured window elements to the lower parts and widening the existing granite stone surround. The proposed windows use a crittal style in keeping with the early twentieth century character of the existing building. The extent of the works necessitate the rebuilding of the façade' stone-work, recreated to match the existing design, with amendments to the proportions around the entrances and depth of the window reveals. The detailed design of the reinstated façade will be controlled by condition to ensure the stonework and windows remain in the spirit of the existing building, ensuring the contribution of this building to the street front is retained and improved.

152. The massing on Gracechurch Street is simplified in comparison to the consent, to enable the necessary structural frame to bridge over the archaeological remains discovered at basement level. The GLA have welcomed this modification, finding it to be an improvement over the constented proposals. The proposals retain a break between the podium and tower above with an open balcony accessible from the office space at level 5, enabling the introduction of planters and greening to create a soft parapet and distinct separation of massing between street level and the tower above. The proposals here are

a change from the existing consent, using a series of four giant columns to create an open character to the parapet. The columns and soffit to the tower are clad in metal to match that of the reinstated windows frames and spandrels of the building below, using a classical fluting to the column design. This detail is complimented by the fascia to the soffit which uses a vertical relief detail to create interest. This open area is planted, accessible from the level 5 offices, with the walkable extent set well back from the building edge. Appropriate suicide prevention measures will be applied via condition.

153. This approach is considered an appropriate way to distinguish the two parts of the building and maintain sufficient breathing space above the retained elevation. Furthermore, the upper setbacks to the south and east elevations would help to minimise the visibility of the tower from the tightknit network of surrounding streets, giving it visibility only from a more limited spatial area.

154. Beyond would be perceived and accessed the proposed new Public Hall and passage, taking up almost the entire ground floor plane, it alone would be an outstanding new piece of architecture. The hall would reveal and reinstate a lost historic route connecting Gracechurch Street and Lime Street Passage. Entering from Gracechurch Street, the public would pass through a broad, two storey entrance space, rising to five storeys in a series of increasing volumes. The design of the interior hall has drawn on the theatricality of the hanging balconies associated with the historic Spread Eagle courtyard to create a vibrant, layered civic space with three balconies overlooking the hall interior. The vertical expression of this interior space is defined with a series of brick arches creating a sequence of niches to either side of the hall, with each arch picked out in a stretcher course surround. The soffits to each balcony have integrated lighting within perforated ceiling tiles (into which acoustic mitigations would also be integrated) which together with clerestory lighting at level five create a dynamic, theatrical lighting to the interior, taking inspiration from iconic Roman architecture.

155. Within the Public Hall, retail units would animate the hall and southern frontage to Gracechurch Street and the rear eastern entrance. Lifts to the Level 5 rooftop walkway and cultural space, basement exhibition space, and bike lifts would be prominently positioned in line with the main entrance to reinforce public desire lines through the site, emphasised with appropriate signage to aid wayfinding.

156. The entrance to the office floors is separated from the public hall, with office tenants entering via the northern bay into the Gracechurch Street façade with an entirely

separate reception desk, lobby, WCs and lift bank. This separation is considered an improvement upon the consented scheme, reinforcing the civic quality of the public realm.

157. Above the hall levels 3 and 4 will provide the end of trip facilities for the office users including showers lockers and cycle stores, accessed via two main lifts to the rear of the main stair within the hall. The proposals include 'Long Stay' cycle parking, accessible cycle parking and bike repair station.

158. The Basement Level 1 of the proposed development will comprise an exhibition and education space, celebrating the archaeological remains of the first Roman Basilica of Londinium. This cultural space will comprise world-class immersive experience using clear walk-over flooring directly over the remains which can be programmed to created an augmented reality space. This approach will allow the archaeology to be experienced in context and in-situ whilst ensuring the displays are flexible and can be updated with minimal further intervention an disturbance. Conditions will be applied to ensure the protection of the archaeology during the construction and operational phases as well as ensure the dis-mounting, replacement or improvement of any technology can be undertaken without risk to the remains. This space is considered to offer a vastly improved cultural space in comparison to the consented scheme given the quality and extent of remains uncovered. Access into the exhibition space is via the central stair and lifts within the main hall. Visitors will move through an arrival desk to a gallery space, with amenities including WCs, store and baby changing space before moving through the immersive display area and seminar room. The space has been designed for adaptable use as an events space when out of hours. Access via public lift to the level 5 roof space then moves visitors on to experience the site in context of the Victorian Market modern London skyline, showcasing an experiential sense of history unique to the scheme. The final fit-out of the exhibition space will be controlled by condition to ensure a high-quality equitable and innovative space which will seek to demonstrate the best in exhibition design.

159. The east elevation comprises a narrow slot between the Leadenhall Market buildings, and would chiefly consist of a simple arched portal providing compelling glimpses of the Hall beyond, faced in stone. At fifth floor level, the proposed Rooftop Walkway would cantilever out, forming a viewing platform from which to appreciate the intricate Victorian roofscape of Leadenhall Market and that of the wider Conservation Area, adapted in plan form in comparison to that of consented scheme, reducing the extent of overhang to

project over the eastern elevation only. As per the consented scheme the walkway would enable new roof-level views of the City Cluster and other heritage assets in the vicinity, including the Grade I listed Lloyds of London building. This has been designed with regard to neighbourliness, existing rooflines and views and would optimise public access in the most compelling area of the scheme, in accordance with Local Plan policy DM10.3 (2) and City Plan DE4.

160. As with the consented scheme the podium part of the proposed development therefore represents an outstanding design response to the local distinctiveness of the site, retaining and finessing its existing scale and architectural character while introducing new spaces, architectural forms and materials and creating new views which multifariously respond to phases in the site's history and the rich, humane context of the Leadenhall Market Conservation Area, all in accordance with London Plan policy D3, Local Plan policies CS 10, DM10.1, DM10.3 and emerging City Plan 2040 S8.

Tower

161. Above the podium, the fundamental layout, orientation, scale, appearance, and shape of the tower are a response to the local distinctiveness of the Leadenhall Market Conservation Area and the wider City skyline. As per the consent, the plan and profile of the tower are derived from the irregular, medieval site plan which has been carried upwards through the tower's form to celebrate the site's location within the fine grain of the Leadenhall Market Conservation Area.

162. Following the relocation of the exhibition space to the basement, structural and efficiency considerations led to a more compact core and a reduction in the number of office floors served. The overall form is now approximately 8 metres shorter than the consented scheme, with office spaces located between Levels 5 and 29.

163. The massing to the eastern façade has been modified since the consented scheme, retaining an articulation in local views, but enabling an increase in office space above Level 12, compensating for the reduction in lower-level office space due to the relocation of plant and EOT facilities above ground.

164. As per the consent, the stepped upper reaches of the proposal on the south and east elevations respond to the seminal views of St Paul's Cathedral along the Processional Route; the stepping back of these elevations would ensure that the proposal would at no point be visible in the views of the Cathedral along Fleet Street and Ludgate Hill.

165. As previously stated, the tower is considered a convincing and high-quality response to this macro, strategic view-level context.

166. The tower would be more solid rather than fully glazed in appearance and would consist of primary horizontals interspersed with fluted double-height columns. These cranked horizontals and fluted columns are directly inspired by existing architectural motifs in Leadenhall Market; they would set it apart from its primarily glazed neighbours and diversify the Cluster as a group.

167. The elevations would incorporate user-operated ventilation panels. Deep, projecting planters with raked, reflective soffits and chamfered corners would create dynamism, depth, and modelling to the west elevation; while to the east elevation to Lime Street Passage a similar arrangement of deep, projecting planters is proposed; on both elevations they would act to give the tower a distinctively serrated silhouette on the skyline.

168. Atop the tower, the final two stories would be expressed differently in the form of a 'crown' of double-height columns, disengaged (for emphasis) from the west, southern and eastern elevations. The set backs allow for a generous roof garden and terrace for office occupiers, designed to provide amenity space suitable for presentations or receptions. This includes an auditorium space, WCs and storage space alongside consolidated plant space. Plant space at level 30 includes provision for: heating and cooling pump rooms, a life safety generator, switchrooms and provision for a separate tenant generator. Atop this, the roofscape of the building would include air source heat pumps-chillers and future tenant heat rejection plant. This is considered to be an integrated approach to the building's fifth elevation, in accordance with Local Plan policy DM 10.1(6) and City Plan 2040 policy S8(10).

169. The very concept of the 'Public Hall' proposed at ground level elides well with the history of public gathering and trading on the site since the Roman period; the architectural forms deployed by the scheme would suitably evoke that period. The space at basement and fifth floor level devoted to interpreting the Roman Forum-Basilica would further parse the history and local distinctiveness of the site. Finally, the plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some conflict has been found with some heritage assets (addressed elsewhere in this report), it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies

Urban Design and Public Realm

170. The proposed development delivers a mix of subterranean, ground-level, and elevated public space, complemented by a vibrant mix of cultural and retail offerings. This integrated approach draws a diverse audience and fosters an inclusive, welcoming, and highly functional environment for both visitors and workers. Each space is thoughtfully designed to prioritise safety, accessibility, and user experience.

171. The ground floor of the existing eight-storey building at 85 Gracechurch Street lacks level access, offers little meaningful public amenity space, and does not provide a public connection into Leadenhall Market. The proposal would significantly improve the existing public realm in and around the site, including;

    1. A multi-level Public Hall at ground floor, open daily, with informal seating, pop-ups, retail frontages, and cultural programming. It reintroduces a historic east–west route connecting to Leadenhall Market.
    2. A basement-level cultural space displaying the archaeological remains of the first Roman Basilica, with exhibitions and learning areas.
    3. 5th Floor Public Viewing Deck with indoor–outdoor spaces, offering views over Grade II* listed Leadenhall Market and the City.

    Since the original consent, the main cultural space has been moved from the 5th Floor to the basement to preserve and showcase significant archaeological remains. At ground level, the office lobby is now located to the north, with the Public Hall and flexible retail unit to the south. Lift cores have been consolidated in the north, providing access to both the viewing platform and basement cultural space, complemented by a large public staircase. These changes improve the clarity and accessibility of the public elements while strengthening the cultural offer through the integration of significant archaeological remains. The revised layout also provides a clearer separation of public and private uses, resulting in a more coherent and welcoming arrival experience.

172. The proposals represent compliance with London Plan (2021) Policies D3, D4, D8, G1, G5, T1, and T2; City of London Local Plan (2015) Policies CS10, CS15, CS16, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.8, DM15.5, DM16.2, DM19.1, and DM19.2; Emerging City Plan 2040 Policies S10, S14, AT1, AT3, S8, DE2, DE3, and DE5; as well as the City of London Public Realm SPD and the City Public Realm Toolkit. The creation of new public spaces and improvements to the existing public spaces comply with policy,

the public realm proposals are considered by officers to be a benefit of the scheme, weighing in its favour. The proposals would represent a substantial public realm offer to the City.

Ground Floor Public Hall and East West Route

173. The ground-level public realm centres on a new Public Hall envisioned as a modern extension of Leadenhall Market. The Public Hall will combine pop-ups, small vendors, informal seating, fixed retail, and cultural programming to create a lively public dining and events space, supporting City and London-wide festivals through performances, exhibitions, and markets. The proposals introduce active frontages across the site, creating a multifunctional space that fosters movement, socialising, and cultural engagement and caters to the needs of a diverse public. A Public Hall and Public Route Access and Management Plan, secured through a Section 106 agreement, will ensure the space aligns with London Plan Policy D8 and the Public London Charter, detailing strategies for safety, accessibility, inclusivity, public access, events, and maintenance to keep the space functional and welcoming to all.

174. The Public Hall will provide 371 sqm (net) of civic-scale public space at ground level, arranged across three split levels. Upper-level balconies, inspired by the timber walkways of the former Spread Eagle Inn, activate the Hall vertically, creating a sophisticated split level civic space. The walkways are inserted into Romanesque brick arch vaults that reference the Roman origins of the site. This contextually specific design aligns with City of London Local Plan policies, including DM10.1(9) and S8(1), and supports the vision of the emerging City Plan 2040, particularly in enhancing the historic character of the area while addressing contemporary civic needs.

175. The reinstated historic east–west route between Gracechurch Street and Lime Street Passage will enhance pedestrian connectivity, supported by proposed footway widening on Gracechurch Street, and contribute to the City's network of human-scale courts and alleys. The reinstatement of this historic route aligns with policies DE4, S8(1), and AT1(4) of the emerging City Plan, as well as DM16.2(6) of the Local Plan. The route traverses the dynamic sequence of the Public Hall, where the spatial experience transitions from the grand entrance on Gracechurch Street to the more intimate scale of Lime Street Passage. Access to the basement cultural use and Level 05 terrace will be provided via a lift from the Public Hall, ensuring step-free access, with a dedicated stair offering an additional direct link to the basement. Servicing will be consolidated and time-managed to avoid conflicts with pedestrian movement along the reinstated route, secured through a Delivery and Servicing Plan. The route and associated spaces will meet high standards

of accessibility, with level thresholds, inclusive materials, and clear wayfinding. A Public Hall and Public Route Access and Management Plan, secured via s106 and/or conditions, will ensure the space is well-maintained, safe, and actively managed as a key part of the City's public realm.

176. Throughout the proposal, signage would be discreetly located in various zones around the Public Hall, advertising the presence of the London Basilica Exhibition, the retail units and various functions as required; details of these would be secured via condition. Signage to the building's exterior elevations to Gracechurch Street and Lime Street Passage would be sensitive, where required, having regard for and in accordance with CS10(7), DM10.5 of the Local Plan and S8 (12) of the emerging City Plan 2040.

177. The hard landscaping draws on the City of London Public Realm Design Guidelines, using granite setts and kerbs to reflect the character of Leadenhall Market. Yorkstone will widen footways, ensuring a seamless fit with the surrounding context. The central route, paved in durable, multi-tonal granite setts, will accommodate servicing while creating a continuous surface from exterior to interior—forming a welcoming threshold to the grand Gracechurch Street entrance. Materials throughout will follow the City's palette of simple, high-quality finishes, in line with the City Public Realm SPD and City of London Public Realm Toolkit and Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

178. The proposed public realm at ground floor represents a high-quality design and a strong architectural response to both local and pan-London contexts. Conditions are proposed to ensure its full potential is realised through detailed design, construction, and operation, in line with Policy D3(12) of the London Plan and S8(14) of the emerging City Plan 2040.

179. The visitor journey is designed as a layered experience through the building. Entry begins at the ground-level Public Hall, which leads down via lift to the basement exhibition centred on the remains of the Roman Basilica. From there, visitors can take the same lift up to a fifth-floor viewing deck. The lifting strategy and its management will be secured via S.106 to ensure inclusive access.

Basement Exhibition Space

180. Accessible via a lift or staircase from the Public Hall, the Basement Exhibition Space showcases the in-situ remains of the First Roman London Basilica, offering a deeper understanding of Roman Londinium. The space aligns with Policy S8 (1) of the City of

London Local Plan, which highlights heritage protection, and Policy S2 (3) of the emerging City Plan 2040, which promotes integrating cultural experiences and heritage in the public realm.

181. The design incorporates a reinforced glass floor revealing the illuminated ruins of the Roman basilica below, creating an immersive and engaging exhibition that celebrates the site's rich heritage—a significant public benefit of the scheme. The space also includes accessible toilets, a baby changing facility, and seminar and presentation areas to support educational use, including school visits and academic workshops. This proposal supports Policy DE4 of the City of London Local Plan, which promotes the provision of inclusive and accessible cultural and educational facilities and aligns with the Plan's broader aims to enhance public access to heritage assets and foster learning opportunities.

5th Floor Public Viewing Deck

182. The Public Viewing Deck on Level 5 will offer vistas over the rooftops of Leadenhall Market, the Grade I-listed Lloyd's of London, and the surrounding conservation area. Linked by lift to the Public Hall and basement exhibition, it complements the cultural experience by placing the Roman Forum in the context of the contemporary cityscape. Local Plan policy DM10.3 and emerging City Plan 2040 policies S8, S14, and DE5 support high-quality, publicly accessible terraces that enrich the City's cultural and civic life. The proposed fifth-floor terrace aligns with these aims, enhancing public access, offering new views, and complementing the site's broader cultural offer.

183. At the southern end of the Public Viewing Deck, a seminar room will provide opportunities for education, skills development, and training, linked to the programming of the basement exhibition. A consistent timber decking will be used across both the interior and exterior areas to create visual continuity and reinforce the connection between the seminar space and the outdoor terrace.

184. In terms of current legislation, 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. Further details about suicide prevention measures for the Public Viewing Deck will be secured via condition.

Public Realm, Management, Cultural and Programmable Events

185. The Public Hall will be publicly accessible seven days a week, with controlled access after-hours to manage servicing and safety. The proposed public realm is designed to support different uses throughout the day and night 24 hours a day, 7 days a week. Servicing will take place during off-peak hours, allowing the Public Hall to function as a public space with active frontages and cultural uses during the day. Outside standard visiting hours the basement level could also be used for events such as receptions, lectures, or launches.

186. The level 5 public terrace will be open daily, remain closed to private events during public hours, and be accessed via dedicated ground-floor lifts with security, with out-of-hours use managed through a Section 106 agreement.

187. The cultural plan aligns with London Plan Policy D8 and the draft Public London Charter, maximizing public access while minimizing restrictive rules. A Viewing Deck Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

Urban Greening Factor

188. The proposal would incorporate significant urban greening, focused on the east, west and upper south elevations from levels 8 to 28 where 1.5m deep planters would be integrated into the building's architecture holding a diverse selection of drought tolerant plants and shrubs selected for their performance under the respective solar and wind conditions of these upper reaches of the tower.

189. The Level 05 terrace on the western façade features woodland inspired planting that softens ground-level views along Gracechurch Street, creating a visual transition between the retained façade and the new tower. Climbing plants on steel trellis would provide vertical greening to buildings columns, whilst larger shrubs with high wind tolerance are placed at the terrace edges to provide shelter.

190. The Level 30 terrace features a woodland-edge planting design with hardy, predominantly native species arranged in layered heights to suit the changing microclimate, enhance biodiversity, and reduce maintenance. Urban greening has therefore been integral to the architectural approach, in accordance with DM10.2 of the Local Plan and S8(7) of the emerging City Plan. Across the entire application boundary,

the development achieves an Urban Greening Factor (UGF) 0.37 which exceeds the exceeds the London Plan (2021) Policy G5(B) UGF target of 0.3.

191. Full details of the landscape designs, including planting specification, and strategies for furniture, lighting, hard surfaces and maintenance, will be conditioned to ensure the designs are of a high quality and resilient in this context. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2.

Lighting

192. In the Hall, perforated ceiling tiles will be backlit to provide soft, dynamic illumination that enhances the warm and welcoming atmosphere. Subtle lighting integrated into the soffits of the walkways to further accentuate the depth and dimension of the brick vaults. At basement level, targeted spotlighting will illuminate the Roman ruins beneath a reinforced glass floor, as well as exhibition artefacts, creating a focused and engaging display.

193. The proposed lighting design aligns with the adopted City Lighting Strategy, aiming to enhance visual amenity while minimising light spill. It is contextually sensitive and reflects the spatial character principles set out in the City Cluster design guidance. Full details will be secured via planning condition.

Transport Related Urban Design Considerations

194. The proposal would optimise Healthy Streets goals by creating a destination for a broad demographic of pedestrians. It would be accessible and welcoming to all, reachable on foot from numerous public transport systems with prominent and legible pedestrian/cyclist entrances from two sides The proposal would have excellent public transport connectivity and would incorporate widened footways to Gracechurch Steet and 104 short stay and 505 long stay cycle parking spaces, thereby making it possible for a majority of visitors to walk, cycle or use public transport to access the proposal, all in accordance with, Policies T1(B) and T2 of the London Plan, as well as CS10 (4,5), CS16 (3ii), DM10.4 (2,8) DM10.8(2) DM16.3 of the Local Plan policies and S10, AT1 (1,2,4) AT3(1), S8(1,2), DE2 (2) of the emerging City Plan.

195. The proposal would provide access for all across the site in a manner which is step-free and inclusive, without undue separation or hinderance. It is important that the elevations, external and part internal, at ground and basement levels but also from levels one to five, are well detailed to achieve the promised positive interfaces and active frontages, and these details would be reserved via condition.

196. All vehicle servicing (excluding cargo cycles) occurs overnight to avoid conflict with public hall users, following agreed hours. Building security personnel staff office entrances during business hours to restrict access, while between 19:00 and 07:00, entrances are secured with swipe access, ensuring controlled egress onto Gracechurch Street.

197. Hostile vehicle mitigation on Gracechurch Street is achieved through removable PAS68-rated bollards spaced no more than 1.2m apart, allowing out-of-hours servicing access. Further security features have been integrated into the architecture, with bespoke metalwork roller shutters to the west and east portals providing visually unobtrusive safety measures.

Conclusion

198. Overall, the proposal makes exemplary use of a highly constrained site, delivering high-quality, inclusive public spaces that significantly enhance the local environment while contributing meaningfully to the City's cultural and civic life. Key features include a thoughtfully designed and actively programmed Public Hall, an immersive exhibition that brings the site's rich Roman history to life, and a Public Viewing Terrace offering expansive views of surrounding heritage assets—together enhancing the site's public value and firmly establishing its role as a cultural and educational destination. The proposed sequence of spaces supports the principles of Good Growth by Design—enhancing accessibility, inclusion, and user experience in accordance with London Plan Policy D3 and Good Growth objectives GG1–GG6.

199. Public realm improvements, active travel enhancements, and pedestrian-first design support the City's Transport Strategy and modal hierarchy. The scheme strengthens the site's interface with its surroundings and enhances convenience, comfort, and visual amenity in accordance with City of London Local Plan Policies CS10 and DM10.1, emerging City Plan Policies S8 and DE2, the NPPF, and the National Design Guide.

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

Heritage and Strategic Views

201. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure and appropriate setting and backdrop to the Tower of London. Policy S23 of the emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016).

Tower of London World Heritage Site – Impact on Outstanding Universal Value (OUV) and Relationship to Setting

202. The proposed impact 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);

203. and to a lesser extent:

v. concentric defences
vi. surviving medieval remains and

vii. physical (historical) associative evidence.

204. The GLA have raised particular concerns regarding attribute ii, and this is addressed below. Historic England have raised concerns regarding attribute vi and v. It is noted that Historic England's consultation response refers to previously published comments from UNESCO, highlighting concerns over the cumulative impact of tall buildings upon the Tower of London. UNESCOs comments do not specifically address the proposals assessed in this application, however consideration of the cumulative impact is illustrated in the submitted HTVIA which shows the future baseline of consented schemes, and an assessment of the Cumulative impact has informed officers conclusions, as set out below.

205. Whilst the ToL comprises a scheduled ancient monument, various listed buildings and is in a conservation area (LB of Tower Hamlets), it is considered proportionate and robust, on the circumstances of the case, to consider the impact on OUV in order to draw a conclusion on the impact on these assets, with the exception of St Peter ad Vincula (Grade I), the impact on which it is considered necessary to assess as a designated heritage asset in its own right.

206. The WHS Management Plan establishes a 'local setting area', and 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Fig. 4 of the WHS Management Plan) but is located in the much wider setting. The Local Setting Study identifies in section 7 those most representative views and/or viewing areas to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints overlap with some LVMF viewing locations, assessed together here for clarity.

207. HE and the GLA have raised concerns regarding impact to an appreciation of the silhouette of St Peter Ad Vincula and the loss of the relative prominence and status of the Tower through the expansion of the City cluster in these views, increasing its proximity and dominance and this is addressed below. It is important to note that the proposals reflect a reduction in height in comparison to the consented scheme. Additionally, the WHS Management Plan acknowledges the influence of the Cluster of tall buildings in 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'. It recognises that the Cluster has had an

emerging distinct identity and the relationship between the ToL and the Cluster is long-established, having existed for over half a century, forming a backdrop in views, including over buildings in the Inner Ward.

208. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. At para 7.3.27, the Management Plan 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 ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

209. Whilst being proportionate, this impact assessment uses the assessment framework in the Mayor's 'London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

Impact on OUV/Significance

210. The proposal would have an indirect impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change would be apparent in views including those from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London.

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

211. This viewpoint is also identified as a Representative View in the Local Setting Study (LSS) (View 9), the impact here is also representative of the impact from Approach 14 (Tower Bridge) in the LSS.

212. The LVMF SPG recognises this as a fine, broad river prospect, its character derived from its significant depth and width. It is the only designated River Prospect in which there are two Strategically Important Landmarks (SILs), St Paul's and the ToL. It allows the ToL, perhaps better than anywhere else, to be read as a significant part of the rich tapestry of London, where there is an acknowledged prominent relationship with the backdrop of tall buildings in the CoL (para 182). The SPG states that an understanding and appreciation of the ToL is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It 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. Other prominent buildings or structures in the background include the Canon Street Station towers, BT Tower, Centre Point and Tate Modern, which all combine to draw and hold the attention of the observer.

213. The visual management guidance anticipates the consolidation of the Cluster which, it is said, 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 (para 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground, applying particularly to the Monument (para 185). The visual management guidance further states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).

214. The GLA have raised specific concerns regarding views of the proposals infilling open sky between 20 Fenchurch Street and the City Cluster, which they find to detract from the appreciation of the WHS. The proposal would be located at a significant distance to the west of the ToL, on the western edge of the Cluster. In the baseline situation, the upper levels of its south and eastern facades would form a new presence between 20 Fenchurch Street and 1 Leadenhall; but located on the far side of the Cluster to the ToL, the impact on the wider setting of the ToL is negligible in this view. In the cumulative scenario, the proposal would be seen with the consented developmen0 fents such as 70 Gracechurch Street as part of a consolidated Cluster and having the same negligible impact on the wider setting.

215. Officers note the proposals would appear at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not harm those relevant attributes of OUV. It would leave unaffected those relevant components which form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship with the River Thames and the City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paras 183-186).

216. The effect of the proposal (when considered alone) on this view, on OUV and on the setting and significance of the designated heritage assets, is considered to be minor and neutral, in the baseline and of a minor benefit in the cumulative scenario, in that it would assist in consolidating the Cluster as a more singular coherent urban from adding to the

stature of the view. Accordingly, the proposal is not considered to harm the setting of the WHS or its OUV.

217. More widely, the siting, scale, form and orientation of the proposal would help to consolidate the Cluster and so make a positive contribution to the character and composition of the view, preserving an appreciation of identified landmarks, including preserving the observer's ability to recognise and appreciate the relevant Strategically Important Landmarks – the ToL and St Paul's Cathedral – in accordance with London Plan Policies HC4, Local Plan policy CS13 and emerging City Plan 2040 Policy S13. It 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.

218. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57) and grow the character and stature of the view in line with the view specific visual management guidance.

219. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmarks. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would ensure that the juxtaposition between elements, including the river frontages and key landmarks. It is in accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

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

220. This view is also identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower and is also Representative View 10 in the LSS. The focus of the view is the ToL and a Protected Vista from 25A.1 focused on axis with the White Tower, which also benefits from a dynamically protected sky-backed silhouette between the Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (para 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflect 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.

221. In the baseline and cumulative scenarios, the proposal would be largely obscured behind 20 Fenchurch Street, occupying a small amount of sky space immediately to the east of it, with a small amount of the upper parts of its east elevation visible. The proposal's stepped, serrated silhouette and articulation of the crown would slot neatly into the gap between 20 Fenchurch Street and 1 Leadenhall Court, providing a pleasing adjunct to the simpler, geometric forms of these buildings. It would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).

222. 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 (largely screened) proposal, it is considered that the proposal would not undermine the composition or characteristics of the view, or of the landmark elements. The observer would continue to recognise and appreciate the ToL as the Strategically Important Landmark, set away from the City and not lost in it. In both baseline and cumulative scenarios, it is considered that the proposal would have a negligible impact on these views and would not result in any harm to the setting of the WHS or its OUV. The siting, height, scale, sculpted massing and masonry detailing would comprise a high-quality design, set a significant distance away from the WHS, respecting the setting of the Tower and not dominating it, in accordance with the relevant LVMF visual management guidance (SPG paras 414-415).

223. The proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette of the ToL between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct, juxtaposed urban forms, in accordance with the visual management guidance (SPG paras 418- 422) and relevant parts of the LSS. The proposal would preserve the relevant attributes of OUV and their associated components.

224. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57) and grow the central characteristic of the view which is the juxtaposition of the modern city and the ToL WHS and of built elements of all eras.

225. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment.

226. Thus it is in accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

Other World Heritage Site Views

227. The Local Setting Study (section 7) identifies Representative Views which are deemed to best exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. The proposal would impact on views from the Inner Ward and from the Inner Curtain Wall (North and South) as well as the approaches from Tower Bridge and along Tower Wharf; the representative impact is to be found in submitted HTVIA views 13A-C, in addition to views 10-12 from Tower Bridge Approach and Tower Wharf.

Inner Ward

228. These views are deemed by the Local Setting Study to illustrate well 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 set apart from the modern city outside the walls, where the relationship between the scale of 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. The associated 'Objectives and Guidance' states that development should
(i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.

229. The LSS states that there is a range of views from within the Inner Ward; these have been assessed in the three-dimensional model, in addition to the submitted HTVIA views. In the baseline scenario the proposal would, from a significant part of Tower Green and the Scaffold Site, be concealed behind the western range of enclosing buildings, having

no visual impact. From the very eastern and south-eastern edge of this area, near the head of the steps down to the Bloody Tower, the upper stages of the proposal would appear behind the Chapel of St Peter ad Vincula and, from certain viewing points, engaging with its bell tower but falling below the towers parapet and lantern.

230. As per the consented scheme, this would be a fleeting impact, perceptible only from a smaller quantum of the viewing area; when moving toward the Chapel, in its immediate setting from the Green, the proposal would move out of view and leave the ensemble unchallenged and still pre-eminent. The effect would be the same in the cumulative scenario, though with the proposal a little less prominent due to the presence of other consented schemes, where it would firmly be read as part of the consolidating singular Cluster form, set away at some distance from the compelling and arresting foreground setting at the heart of the medieval palace complex and its rich traditions. Due to the reduction in the height of the scheme in comparison to the consented design, it is further noted that the current proposals reflect a reduced visibility in these views.

231. It is considered, then, in accordance with the guidance in the LSS, that the proposal would (i) respect the unique sense of place and the preeminent 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. Officers disagree with Historic England, considering the proposals to be in keeping with the existing character of the skyline behind the Chapel, which is presently characterised by glimpsed, partial views of the upper levels of Towers within the City Cluster. For this reason officers do not consider the proposals undermine the ability to appreciate the surviving medieval remains associated with the ToL (attribute iv). Further discussion of impacts to St Peter Ad Vinclua as a Grade I listed building is included below (Para 481). It is further considered that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged. Therefore in terms of the overarching attributes of OUV and their components, the relationship between the ToL and the City beyond is considered to be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct, long-established backdrop entity, set away from the ToL, which would not be lost within it and preserving the extent to which the structures within the curtain walls are perceived as a distinct historic group with layered historic and functional associations.

Inner Curtain Wall (South)

232. The LSS recognises that these views are a 360-degree experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, an appreciation of the historic

relationship between the ToL and the River and, whilst under the associated guidance, seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond. In the baseline scenario, the upper stages of the proposal would be clearly visible above the Beauchamp Tower, occupying clear sky space to the north of 20 Fenchurch Street, between it, 1 Leadenhall and the Cluster beyond. The sculpted, tiered south and east elevations and the refined crown of the proposal would provide a complementary form to the simple geometric forms of the other Cluster buildings; moreover, the proposal would be considerably lower than them, positioned as a mediating step in height. In these respects, the proposal would assist in consolidating the Cluster's distinct singular urban form and separate, long-established identity, more so in the cumulative scenario when it would be perceived as nestling amongst other consented schemes such as 70 Gracechurch Street.

233. In both scenarios, the White Tower, accentuated by its massive, fortified walls, would remain the focus of the view. It would continue to dominate that part of this 360-degree viewing experience, with the Cluster a distant subservient entity beyond; whilst the proposal would not intrude into the other vantages of this viewing experience, preserving the essential relationship between the ToL and the River and an appreciation of it as a historic gateway.

234. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

Inner Curtain Wall (North)

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

236. Sited a considerable distance to the west in these views, in the baseline scenario, the upper stages of the proposal would appear prominently in the sky between 20 Fenchurch

Street and 1 Leadenhall. The sculpted, tiered south and east elevations and the refined crown of the proposal would provide a complementary form to the simple geometric forms of the other Cluster buildings; moreover, the proposal would be considerably lower than them, positioned as a mediating step in height. In these respects, the proposal would assist in consolidating the Cluster's distinct singular urban form and separate, long established identity; more so in the cumulative scenario, when it would be perceived nestling amongst other consented schemes, although the proposal would begin to be occluded by the consented form of 50 Fenchurch Street, lowering its prominence in the view.

237. In both scenarios, the proposal would appear on the western side of the established Cluster, consolidating its distinct form, whilst preserving that relationship with the ToL, and preserving the pre-eminence of concentric defences in these views, all in accordance with the guidance.

Other Views of the ToL

238. Other views have been provided which are not identified as strategic views in LVMF or as views in the Local Setting Study but which demonstrate the attributes and components of OUV where there would be a relationship with the proposal.

239. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster in the background and the ToL ensemble continuing to dominate the foreground, causing no harm.

Conclusion – Impact on the Tower of London World Heritage Site

240. 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.

241. It is acknowledged that HE and the GLA found 'some' and 'low' less than substantial harm respectively to the WHS, albeit neither the GLA or HE object to the scheme on these grounds acknowledging this harm is reduced in comparison to the consented scheme. Officers attribute considerable importance and substantial weight to the views of HE as the Government's advisor on the conservation of the historic environment. However, for the reasons set out in the detailed assessment, officers disagree that the

proposal would cause harm. The scale of change in all instances is considered to be between negligible and minor, the magnitude of impact small, in both baseline and in particular in cumulative scenarios.

242. In all instances, the proposal would preserve the attributes of the OUV and the authenticity and integrity of the WHS, . While the concerns of the GLA and HE are acknowledged the proposal has been designed to read as part of the consolidating singular form of the Cluster, as part of a long-established backdrop to the ToL ensemble which has been curated by consistent decision making on behalf of the strategic and local planning authority for the best part of half a century. Therefore, proposal would not harm the significance of the ToL, whether in relation to the WHS or any of the component heritage assets which comprise it.

Other London View Management Framework Impacts

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

244. The site is in 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. 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.

245. 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 identified views, in particular the River Prospects.

246. In view of the consented scheme, views where the proposals are considered to have no interaction with the management guidance or the impacts can be reasonably judged from another viewpoint, have been scoped out of assessment. This is considered to be a proportional response given the impact of the proposals over the baseline scenario, noting that the consented scheme is a material consideration and the reduced height and mass of the new proposals.

London Panoramas

247. The proposal would be visible, to the discerning, focused eye and/or through use of magnification, from all the London Panorama Assessment Points. In all instances the City Cluster, or component elements of the Cluster, which the guidance seeks to consolidate (para 57, for example), is either identified as a landmark element or other feature of the view. 1A.1-2, Alexandra Palace Viewing Terrace, is an iconic broad and deep panorama from the northern suburbs back across the Thames basin and towards Central London. The visual management guidance (para 85) identifies the Cluster as a distant focal point allowing for orientation. The proposal would be discernible as part of the consolidation of the City Cluster, assisting in the process of visually ameliorating the isolated bulk of 20 Fenchurch Street into a more coherent singular urban skyline form. This would support the aim of para 87 that new tall buildings consolidate and improve the composition of existing clusters of tall buildings, sharpening the distinction between the lower density residential of the mid-ground and background higher density character of central London. In consolidating this townscape element, in line with para 90, the proposal would manage the transition down to St Paul's Cathedral as the SIL, releasing growth pressure on the intervening unspoilt distant horizon of the Surry Hills (South London) and on a clear day, the North Downs, thus preserving and enhancing the viewer's ability to recognise and appreciate St Paul's. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

248. 2A.1, Parliament Hill from the summit, is another famous strategic panorama of London from one of its best-known peaks. As at Alexandra Palace, given the wide span and depth, the consolidation of significant tall buildings into clusters assists the viewers orientation, understanding and ultimately appreciation of the view. The siting of proposal in the City Cluster means there would be no impact on the three Protected Vistas towards the two SILs, St Paul's and the Palace of Westminster. It is a good place to appreciate the City Cluster's emerging conical form, both picking out the individual silhouettes and as part of a consolidating singular identity and coherent urban skyline form. In baseline and cumulative scenarios, the proposal would assist in assimilating the isolated bulk of 20 Fenchurch Street into a discreet identity for a place of London-wide and National importance. Para 96/106 recognises the contribution of the City Cluster demarcating the financial district and governmental centre of London. As identified (para 97), like the Shard on the opposite side of London Bridge, the Cluster assists the observer in

recognising and isolating St Paul's, whilst the consolidation of tall buildings allows the for an appreciation of it in its wider backdrop of the rolling Surry/Kent hills and its prominent place in the wider Thames basin, which the guidance identifies as framing the silhouette of the city (para 96). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

249. 3A.1, Kenwood at the viewing gazebo, is another Hampstead Heath view from of the finest historic homes in North London. Given the pre-eminence of the gentle and verdant fore and middle ground of the Heath, an appreciation of the great depth of an otherwise framed view of central London is dependent on tall built form breaking the distant North Downs. As such, the City Cluster is a strong orientation point and complementary feature in an appreciation of the composition and characteristics of the view. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's, or on a recognition or appreciation of the Palace of Westminster as the other SIL.

250. The proposal would assist the consolidation of the conical City Cluster as a distinct and coherent urban skyline form, assisting in drawing out that arresting contrast between the semi-rural parkland and the modern commercial core of central London rising above and beyond, as identified in the visual management guidance (para 116). It would assist in assimilating the isolated bulk of 20 Fenchurch Street into the dense clustering of more rectilinear towers, as identified at para 117, whilst in breaking the distant Downs allowing the observer to orientate and, to the right, assist in recognising and appreciating St Paul's as the SIL, especially since it is backdropped by the Shard, just the other side of London Bridge. The consolidation of tall buildings here frees the wider backdrop hills to accentuate an appreciation of St Paul's and its strategic location in the wider Thames Basin (para 121). The distinction of a singular Cluster form avoids the visual confusion caused by ad-hoc tall buildings which undermines the recognition and 72 appreciation of the Palace of Westminster (para 118). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

251. 4A.1-2, Primrose Hill summit, is a small foothill in the initial climb up the North London hills, it is a popular destination just north of Regent's Park affording a spectacular panorama of central London seen in close detail. The siting of proposal in the City Cluster means there would be no impact on the two Protected Vistas towards St Paul's and the

Palace of Westminster, the SILs. 228. The City Cluster is identified as a complementary feature of the view, where it is identified as somewhat screened by towers at Euston (para 129), standing in contrast to the lack of order or coherence of the mix of larger commercial and residential buildings in the middle ground (para 128). The proposal would assist in consolidating the clear conical City Cluster form, assisting in the assimilation of the isolated bulk of 20 Fenchurch Street into a singular coherent skyline form. This would assist the composition of the view, consolidating an existing landscape feature in accordance with para 130 of the SPG. This will assist in differentiating it from the consolidating Ise of Dogs Cluster in the background, assisting in an appreciation of the scale and depth of London. The proposal would assist the stepping down of the Cluster towards St Paul's, whilst assisting in the preservation of the sky gap and appreciation of the distant wooded hill horizon line which reinforces a recognition and appreciation of St Paul's. In the cumulative view the proposals would be entirely occluded. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

252. 5A.1-2, Greenwich Park General Wolfe Statue, is a seminal London view of great historical significance allowing one of the most comprehensive views of the Capital. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (5A.2).

253. This is a broad and rich panorama allowing a full appreciation of London as a great historic port city focused on the River Thames, with the exceptional foreground formal classical landscape of the Royal Naval College in dramatic juxtaposition with the consolidating Docklands Cluster beyond. The SPG recognises that this offers layering and depth to the view (para 144). The Thames meanders back to central London, announced by the City Cluster, which is an important orientation point for the observer in the recognition of St Paul's.

254. Due to the reduced height of the proposals, the scheme would not be visible in this view, occluded by existing development, resulting in an overall neutral impact.

255. 6A.1 Blackheath Point, is on high ground of historic strategic importance on high ground on the historic route from the Kent coast and the continent and would have been the first site of the skyline of the Capital. The siting of the proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (6A.1). As at Greenwich, it would assist in the consolidation of the City Cluster as a coherent skyline

form assisting the composition and characteristics of the view overall. The proposal would result in a very minor enhancement to the view overall.

LVMF River Prospects

LVMF 15B.1-2 – River Prospect, Waterloo Bridge (Downstream):

256. This is an iconic London view. St Paul's Cathedral is identified as the SIL. It is considered that the proposal would complement the development of the emerging City Cluster as a singular, coherent entity on the skyline. In both the baseline and cumulative scenarios, it would have a minor impact on the character and composition of the view, standing amidst 1 Leadenhall, the Scalpel and the Willis Building; with its pale masonry architecture and sculpted silhouette, it would add pleasing contrast and diversity to these simple glazed forms of the other familial Cluster buildings. The height of the proposal is appropriate to the site, appearing as a lower, mediating influence between the apex of the Cluster to the north and 20 Fenchurch Street to the south. Stepping down in height from the Cluster apex, towards the scale of the River, and of a high-quality design, the proposal would accord with para 263 of the SPG guidance. The proposal would not draw tall buildings closer to St Paul's Cathedral, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paras 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified. It would consolidate the City Cluster in accordance with para 74 of the SPG. The proposal would result in a modest enhancement to the view overall.

LVMF 16B.1-2 – River Prospect, the South Bank: Gabriel's Wharf Viewing Platform:

257. St Paul's Cathedral is identified as the SIL. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street, preserving and enhancing the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-283 and 57 of the SPG. The proposal would result in a minor enhancement to the view overall.

LVMF 19A.1-2 River Prospect, Lambeth Bridge (downstream)

258. The focus of the view is the Palace of Westminster, the SIL, alongside other landmarks including Westminster Abbey, Victoria Tower Gardens, Whitehall Court, the London Eye, Westminster Bridge and Lambeth Palace, whilst 30 St Mary Axe (the Gherkin) and Tower 42 in the City Cluster as also identified as positive features. The visual guidance

describes the juxtaposition between the greater intensity of buildings north of Westminster Bridge and on to the CoL as secondary to the 'semi-pastoral' setting of the World Heritage Site (para 332), while the 75 distant Cluster makes for a deep view (para 333), allowing for a strong appreciation of the geography of London, and a juxtaposition between the political and commercial centres of the Capital.

259. The proposal would assist in the consolidation of the City Cluster and the assimilation of the isolated bulk of 20 Fenchurch Street into a coherent singular skyline form with a stronger identity, in accordance with the aim to consolidate existing clusters in the visual guidance (para 57). In the kinetic experience between A.2-1, the Cluster would track in behind the informal picturesqueness of the chimneyscape of Lambeth Palace in a pleasing and subtle manner, allowing the composition and characteristics of the landmark to remain pre-eminent. It would accentuate the composition and characteristics of the view, in particular, that subtle juxtaposition between the semi-pastoral fore and middle ground and the distant financial distinct, allowing a greater appreciation of the topography of London.

260. In accordance with the visual management guidance the proposal would respond positively to the characteristics of the river fronting buildings and enhance the composition of the view and the status of all landmark elements (para 334). This is in accordance with the anticipation of the visual guidance, which anticipation the consolidation of the City Cluster (para 338) and a recognition and appreciation of the SIL would be preserved. It is considered the proposal would result in a minor enhancement of the view overall.

Summary of LVMF Impacts

261. As per the consented proposals,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, in accordance with London Plan Policy HC4.

City of London Strategic Views

262. As above, the consented proposals are a material consideration when assessing the scheme. Where the nature of the impact is considered unchanged from the consented scheme and or the impact can be reasonably judged from other provided views, these have been scoped out. This is considered to be a proportional response given the impact of the proposals over the baseline scenario, noting that the consented scheme is a material consideration, and the reduced height and mass of the new proposals.

Monument Views

263. As contemplated by Local Plan policy CS13, the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposals have been designed, in terms of siting, height and appearance, to preserve views of and from the Monument.

Views from the Monument

264. As per the consented scheme the proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.

265. Para 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument.

266. As per the consented scheme, the proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall, read as part of the consolidating Cluster, albeit in the cumulative scenario, the proposal would be obscured by the consented form of 55 and 70 Gracechurch Street.

Views of and Approaches to the Monument

267. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD (Figure 8), leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposal would be in its near setting and visible in some of the identified Views along Street Axes.

268. In views on approach from the south at Monument Street and Lower Thames Street junction looking north along Fish Street Hill, as per the consented scheme, the proposal would be seen as part of the existing tall buildings to the eastern side of Gracechurch Street, the Monument's sky silhouette and skyline setting would be unaffected. No harm would be caused and the proposal in accordance with paragraphs 4.23 of the SPD.

269. As per the consented scheme, in views from Tower Bridge the proposal would be viewed as part of the consolidating Cluster, remote and at a distance from the orientation of the view along Monument Street in which the skyline setting of the Monument rising out of the Custom House would be unaffected. No harm would be caused and the proposal is considered in accordance with paragraphs 4.22 of the SPD.

Conclusion on the Monument

270. In summary, the proposal has been designed to protect and enhance significant local views of and from the Monument, thus protecting their contribution to the overall heritage of the City, in accordance with Local Plan Policy CS 13 and associated guidance in the Protected Views SPD.

St Paul's Viewing Points

271. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3). It would be visible in the kinetic riparian sequences along the Thames bridges and from the South Bank Queen's Walk, in particular in those orientated towards the Cathedral between Hungerford and Millennium Bridges.

272. The proposed height and form of the tower has been designed around the strategic heritage consideration of the processional approach to the Cathedral from Fleet Street and to consolidate a coherent Cluster form in those strategic riparian views in line with LVMF visual guidance.

273. From the Processional Route the envelope and been designed to avoid any erosion of sky silhouette and space afforded to the Cathedral, thus ensuring its pre-eminence in this viewing experience of state and royal significance.

274. From the Thames bridges and South Bank the proposal has been designed to contribute to the stepping down from the summit of the 78 Cluster at 22 Bishopsgate/1 Undershaft

and to continue the process of assimilating the isolated bulk of 20 Fenchurch Street, bringing it into a singular coherent cluster form on the skyline.

275. As per the consented scheme the proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral, seen in context with the existing buildings of the City Cluster, with no alteration to the existing character of this view which takes in the full height of the City Cluster as perceived from the west.

276. Overall, the proposal has been designed to protect and enhance local views of St Paul's Cathedral, its setting and backdrop, in accordance with Local Plan Policy CS 13(2c) and City Plan S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Views from Other Publicly Accessible Elevated Viewing Areas

277. From the rooftop garden at 120 Fenchurch Street, the proposal would appear as a prominent new form alongside 1 Leadenhall Court, its sculpted form and pale masonry architecture providing a foil to the simple glazed geometry of its neighbour. The slender form of the proposal would preserve views of St Paul's Cathedral and allow the two to be read together; it would be possible to perceive how the Processional Route views have shaped the upper parts of the proposal.

278. Views of other notable landmarks in the view such as the Lloyds Building and St Michael Cornhill would be preserved.

279. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated between the Leadenhall building and 52-54 Lime Street. The proposal will consolidate the form of the Cluster, resolving the current 'missing tooth' effect between the buildings noted above. Views towards the central brick tower of the Tate modern will be preserved. When the cumulative scheme is considered, this effect will be enhanced, seen together with 1 Leadenhall Street and 70 Gracechurch Street. The visual amenity of the viewing gallery is therefore considered to be preserved.

Other Borough Strategic Views

London Borough of Lambeth Local Views

280. Adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD.
281. Local Views v and vi are from the South Bank towards St Paul's Cathedral, the proposal would, on the whole, be out of view, given the significant screening effect of foreground buildings/trees, preserving an appreciation of the Cathedral as the main skyline landmark. It would assist in consolidating the overall Cluster form to calm its appearance in contrast to the Cathedral. The proposal would thus preserve and enhance these views.
282. Overall, it is considered the proposal would protect (and enhance) the general composition and character of these Local Views.

London Borough of Southwark

283. Adopted Southwark Plan Policy P22 seeks to preserve and enhance Borough Views of significant landmarks and townscape, enhancing the composition of the panoramas across the Borough and central London as a whole, and includes View 5 (the townscape view south from the centre of Millenium Bridge). In this view the proposals are seen comfortably within the centre of the cluster with the upper levels falling below the height of the adjacent 53 Lime Street. There would be no interaction with St Paul's Cathedral and the character of the view is considered to be preserved.

284. View 4 (King's Stairs Gardens, River Prospect) is identified as a characterful view of some of London's most famous landmarks including Tower Bridge, St Paul's Cathedral and the River Thames. This is amongst other contributing landmarks including 20 Fenchurch Street and the City Cluster in an undulating skyline with a clear narrative demonstrating London's development as an internationally important mercantile city of commerce. The proposal would be visible and would assist in consolidating the City Cluster as a strategic landmark element, framing the viewers orientation key landmarks of Tower Bridge and St Paul's, enhancing their recognition and appreciation in the composition. Overall, the proposal would preserve and enhance the composition of the view, and of significant landmarks and townscape, ensuring the River Thames and its frontage, Tower Bridge and St Paul's are maintained in the view in accordance with P22.

285. In summary, the proposal would preserve Borough Views 1-5 in accordance with Southwark Plan Policy P22 and the visual management guidance contained in Appendix 4.

City of Westminster

286. Adopted Westminster City Plan 2019-2040 Policy 40(F) (Townscape and Architecture) states that new development affecting strategic and local views (including views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views where possible. Whilst in draft, the Metropolitan Views SPD (2007) is understood to contain those local metropolitan views.

287. The downstream views from Hungerford and Waterloo Bridges correspond with the LVMFs and local CoL St Paul's Viewing Points addressed elsewhere in this report. The Metropolitan Views SPD describes them as dominated by the City's financial district, with St Paul's remaining of central importance. This aspect would remain unchanged and as set out elsewhere in this report, the proposal would preserve the setting of St Paul's by consolidating the City Cluster's distinct and separate skyline form, strengthening the overall composition. It is considered the proposal will preserve the character of these views in accordance with the SPD.

288. In summary, the proposal would preserve V42 and V43 with regards to their characteristics, composition and significance of the local views of metropolitan importance, in accordance with Policy 40 and guidance contained in the draft Metropolitan Views SPD.

London Borough of Camden:

289. Other than those relevant LVMF pan-London views from Parliament Hill, Primrose Hill and Kenwood, addressed elsewhere in this report, Camden have not designed strategic local views of relevance to the CoL.

290. Conclusion on Neighbouring Borough Local Views:

291. The proposal would result in the preservation of neighbouring Borough strategic local views.

City Landmarks and Skyline Features, Views Of

292. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2).

Lloyd's Building

293. The Lloyd's building is presently partially and distantly visible from a number of viewpoints along the river and to the west, appearing diminutive against its taller neighbours within the Cluster. The quality of these views is such that the building is not readily discernible to the naked eye, and only identified through magnification. Within the majority of views, the proposals will be seen either adjacent, very partially in the background, or partially reducing the visible extent of the Lloyd's building. The Lloyd's building will however continue to be identifiable, curbing the extent of the impact which does not amount to a total loss of visibility.

294. Additionally Officers' assessment has found consented schemes will occlude the Lloyd's Building entirely within these views, mitigating this partial loss of visibility.

295. For completeness, it is noted that within one view from Waterloo Bridge (LVMF 15B.2) the proposals will screen the Lloyd's building entirely. However, the extreme distance of this viewpoint is such that the building is not identified as a contributor within the LVMF SPD, either a 'landmark' or within the supporting text. As such this loss of visibility is not considered to reach a sufficient threshold to create harmful impact. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Cannon Street Station Towers:

296. The proposals will be seen as part of the backdrop behind the Station Towers in views from Southwark Bridge, forming part of the city cluster. While the proposals will be visible in views of towers, the proposal is not considered alter or detract from the presence or contribution of the Station Towers within this view, with the distance of this viewpoint from the site allowing the Station Towers to remain distinct. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Former Port of London Authority HQ

297. The proposals will be visible in views to the Former Port of London Authority, forming part of a backdrop of tall buildings within the City Cluster. Officers consider that while visible, the proposals will not diminish an appreciation of the listed building's silhouette or decorative detail. Further to this the cumulative scheme indicates the proposals will be screened entirely within these views, forming but one part of an evolving established cluster, seen within the distance. Therefore the former Port of London Authority HQ is considered to retain its prominence and visual strength. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see the additional assessment within the designated assets section below.

Southwark Cathedral

298. The location of the proposals will not affect any identified views of Southwark Cathedral. While the building will be visible in views towards the cathedral from Borough High Street, no harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Royal Exchange

299. The proposals will be seen together with Royal Exchange in views east from Bank junction. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Tower Bridge

300. The proposal would affect viewpoints looking towards Tower Bridge along the South Bank of the River, located to the east and looking west. From Butler's Wharf, in the baseline scenario, the proposal would partially infill the sky gap between 20 Fenchurch Street and the northern tower of the Bridge. As such, the proposal would cause a limited degree of harm to the setting of Tower Bridge, specifically through reduction of its clear sky setting within this view.

301. Officers note this impact will lessen further as the Bridge is approached, subsequently becoming more dominant and commanding within the foreground. Given the limited and transient nature of this impact, combined with the significant distance of the site to the west, the proposals overall are considered to cause a slight level of less than substantial harm to the significance of Tower Bridge, very much at the lowest end of the spectrum. Please see additional assessment within the designated assets section below.

Tower of London

302. The proposals will be seen in views from and towards the Tower of London, specifically identified and assessed in detail elsewhere in the report. This assessment acknowledges the longstanding relationship of the City Cluster with the setting of the WHS, appreciated as a distinct and separate element. This assessment has found the proposals will be seen with the Tower of London in views from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London, visible within the western edge of the cluster. Within these views it has been found that the proposals will not obscure, distracted from or dominate the Tower of London due to the intervening distance, siting, scale, form and appearance of the proposals. 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. Officers therefore found the proposal would not harm relevant attributes of OUV or relevant components which form part of the LVMF visual management guidance. The overall contribution of setting and therefore the significance of the WHS or its OUV has therefore found to be preserved. Furthermore it is also considered the proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF including the view specific visual management guidance. The overall skyline presence of the Tower of London is therefore considered to be preserved.

St Michael Cornhill

303. St Michael, Cornhill is identified in the Protected Views SPD as city church with a skyline presence. The proposals will be seen in transitory views together with the church tower when moving east along Cornhill towards the site. This includes a specific incident where the proposals, through their appearance the background, will be seen to join-together with the tower's outline against the sky. This impact and its effects on the setting and significance of the tower is assessed in detail below. In summary, officers consider this change will be experienced as a fleeting moment, and one taken together with the established views of the city cluster- the latter presently appreciated as a dynamic backdrop feature which frequently results in arresting contrasts of this nature.

Nevertheless, such is the contribution of the view from Cornhill/Royal Exchange Buildings to the church's significance that the proposal is considered to cause a low level of less than substantial harm to its significance, in particular an appreciation of it, taking into account all mitigating factors outlined. Officer's note given the reduction in the scheme's height this level of harm is reduced in comparison to the consented scheme.

Conclusion on City Landmarks and Skyline Features

304. The proposal would preserve views of all relevant City Landmarks and Skyline Features with the exception of causing some minor harms to St Michael's Cornhill and Tower Bridge. This would result in some minor conflict with part of CS 13(2).

Conclusion on Strategic Views

305. The proposal has been sited in the City Cluster which is central to the strategic growth balance in the City. This seeks to consolidate strategic growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of the City and London. It would assist the consolidation of the City Cluster and would preserve and take opportunities to enhance the composition and characteristics of strategic LVMF views. It was also sited and designed to preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral, including from the Processional Route. It would enhance the composition and characteristics of a number of neighbouring borough views which draw some benefit as a material consideration. It would draw some more limited conflict with CS13(2) in that, whilst preserving views of most relevant City Landmarks and Skyline Features, would cause some minor diminishment of views of the Church of St Michael Cornhill and Tower Bridge.

306. Overall, the proposal satisfies and draws support from London Plan Policy HC4, Local Plan Policy CS13(1&3) and City Plan S13 and associated guidance in the LVMF SPG and Protected Views SPD. At the same time, it would draw some conflict with the part of CS13(2), as it relates to City Landmarks and Skyline Features. Overall, on balance, it is considered the proposal would accord with Policy CS 13.

Designated Heritage Assets

307. Objections have been received from the Government's advisor on the historic environment, Historic England, in addition to heritage harm has been raised by the GLA.

Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Leadenhall Market Conservation Area

308. The site of the proposal is located within the Leadenhall Market Conservation Area (CA), with its frontage to the western CA border along Gracechurch Street and its north, east and south elevations facing into series of lightwells which diverge from the intricate tangle of alleys and throughfares leading to the heart of the CA; the site's north and east elevations directly adjoin and share party walls with the Market buildings on the Central Avenue and Lime Street Passage, while the south elevation adjoins and shares a party wall with 1-4 Bull's Head Passage.

Character, Appearance and Significance

309. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD was adopted in 2017. It articulates the character, appearance and significance of the Conservation Area, distilled in six Identified Attributes under Section 3 ('Summary of Character', p.8), as follows:

- The grade II* listed Victorian buildings of Leadenhall Market are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience.
- A vibrant mix of uses and activity, strongly complimenting the predominantly financial and insurance activities in the area.
- Highly significant archaeological remains relating to the 1st Century Basilica Forum and medieval 'Leaden Hall'
- A place where the predominant scale of buildings, streets and spaces contrasts greatly with those in its immediate setting, resulting in dramatic townscape views;
- Preservation of the medieval street plan within the 19th century market buildings, offering an intricately layered plan form and retained historic thoroughfares;
- An area which is increasingly experienced from higher level viewpoints and where the appearance of its roofscape is of special importance.

310. The SPD highlights, in Section 5 (p.16) certain Identified Views (in a non-exhaustive list) through which this character, appearance and significance can best be appreciated. The

impact of the proposal upon each Identified Attribute and relevant Identified View has been assessed below.

311. The SPD does not specify the contribution of the existing building to the character, appearance, and significance of the CA; instead, it notes (p.20): 'Dating to the 1930s, Nos. 85-87 has a far simpler [than neighbouring 81-82] Portland stone street elevation with minimal surface decoration save for Greek detailing and a strong central granite entrance with prominent keystone. The building has been sympathetically remodelled at street and first floor levels to provide a symmetrical retail frontage'. Though not explicit, the SPD implies that it is the principal facade on Gracechurch Street that contributes to the character, appearance and significance of the CA. The GLA also note that, overall, it makes a positive contribution to the Conservation Area.

312. As per the consent, officers find that the principal Gracechurch Street elevation is the only element of the current site which makes a positive contribution to the Conservation Area, the result of its 'Neo-Grec' style, detailing and higher quality materials, tempered somewhat by later alteration. It is considered that this element makes a modest contribution to the character, appearance and significance of the Conservation Area.

313. The 'roof' above principal parapet level and other secondary elevations are all considered expedient and utilitarian, and of a somewhat incoherent and cluttered form and appearance.

314. At a scale only somewhat familiar but still in abrasive contrast to the adjacent market buildings, it is considered, overall, these elements cause a modest detraction from the Conservation Area, in particular when viewed from Lime Street Passage, but also from above.

Contribution of Setting

315. The CA is located at the western edge of and in amidst the City Cluster of tall buildings and its immediate setting is defined by a backdrop of tall buildings, particularly to the north where in baseline and cumulative scenarios dramatic and dynamic juxtapositions exist with the CA: Lloyd's of London, 1 Leadenhall, 6-8 Bishopsgate, 22 Bishopsgate and 122 Leadenhall Street. These comprise a particularly prominent backdrop in views looking north from Gracechurch Street, Lime Street and Lime Street Passage; views in which No. 85 would also figure. To the south, 20 Fenchurch Street forms a prominent backdrop to southerly views from within the CA, a quality that would be reinforced by the implementation of consented tall building proposals for 55 and 70 Gracechurch Street.

316. Overall, it is considered that the Conservation Area draws only modest contribution from elements of setting to significance, in particular an appreciation of it. The substantial significance is drawn from the intrinsic interest inherent in the physical form and fabric of those contributing elements of the Conservation Areas, comprising good surviving parts of buildings and historic grain and street patterns. It is considered that those positive elements of setting which make a modest contribution to significance are:

- The dramatic and clear contrast in scale between buildings between taller buildings and smaller, finer grain historic structures, best observed in some juxtapositions between new and old such as that between Leadenhall Market and the Lloyd's Building (Grade I) whose special interest in part is deemed by Historic England to glean from it forming a ''wonderfully incongruous'' backdrop by surrounding listed buildings, in particular that with Leadenhall Market. It is considered this makes a modest contribution to significance and an appreciation of it.

317. The relationship with complementary historic buildings comprising the Bank Conservation Area (assessed below), in particular the buildings fronting the west side of Bishopsgate and Gracechurch Street. This is considered to make a modest contribution to its character, appearance and significance.

318. In summary, then, the CA's character, appearance and significance is augmented in the traditional sense by its westerly setting towards Bank, but also derives a more modern, dynamic contribution to significance from its north and eastern settings of the City Cluster.

Impact

319. Under the proposal, the existing building would be demolished, Gracechurch Street principal façade rebuilt in facsimile with the current openings slightly adapted and enlarged to provide openings for the Public Hall, flexible office space and Heritage Walkway, with the office tower element rising distinct above.

320. The proposal would infill lightwells which currently exist to the north, east and south elevations, with these elevations of the proposal abutting the party walls of the New Moon Tavern, Leadenhall Market, 1-4 Bull's Head Passage and 81-82 Gracechurch Street. As part of this a number of chimneystacks serving the Market, extended upwards in the 1930s as part of the construction of the existing building, would be trimmed back down to approximately their Victorian extents. These works are considered acceptable in

principle and are subject to a separate LBC. Full details of the interfaces between the proposal and the existing party walls around the site would be reserved via condition.

321. The proposed demolition of the building and rebuilding of the Gracechurch Street façade to in an almost completely faithful facsimile, is considered to be acceptable in principle. The demolition of the east, north and south elevations and roofscape of the building, which detract from the character, appearance and significance of the Conservation Area, is considered an enhancement in principle, subject to the acceptability of the replacement.

322. The modifications to the façade would be:

323. (i) widening the existing stone central portal with replacement stone detailing to match moulding and relief (ii) extending vertical bay divisions to ground iii) introducing bronze doors to the flanking bays, inspired by and in the spirit of drawings of the original elevation and (iv) recessing the existing bronze windows and spandrels on the upper levels to introduce greater depth and articulation to the façade.

324. These works would replace works of later modern remodelling and imbue the elevation with materials and detailing characteristic of the age in which it was designed and built. This is considered to be an enhancement of the elevation, and therefore of its contribution to the CA; relative to the scale of the CA as a whole, and the status of the existing building within it, the level of this enhancement is considered to be slight.

325. Accessed through the reinstated frontage, the proposed Public Hall would reinstate a historic east-west route across the site, linking Gracechurch Street with Lime Street Passage. This would be a direct enhancement of the retained medieval plan form and intricate historic throughfares which, as Identified Attribute 5, the SPD lists as part of the character, appearance and significance of the CA. Faced in traditional materials and of compelling spatial proportions and architectural details influenced by the adjacent Market and Roman architecture the Hall would be a complimentary new space within the CA that would sit comfortably alongside the covered walkways of the Market and the elevations of the wider CA. Moreover, it would sympathise with and perpetuate the historic functionality of the Leadenhall as a gathering-place. Overall, the provision of the Hall and associated reinstatement of the historic route is considered to be a modest level of enhancement to the CA as a whole.

326. Attribute 2 of the SPD identifies that the vibrant mix of uses and activity within the Conservation Area forms part of its character, appearance, and significance. The provision of the proposed Public Hall and the Heritage Walkway would considerably enrich this vibrant mix of uses and activity within the CA, by providing spaces and uses that are currently not present within the CA and would be complimentary to the existing Market and associated uses. It is thereby considered that this would represent a modest level of enhancement of this attribute of character, appearance, and significance overall.

327. As with the consented scheme, care has been taken to differentiate between the podium, and how the proposal meets its immediate context, and the integration of the tower elements above to respond to the unique characteristics and significance of this Conservation Area in amidst the City Cluster.

328. Given the narrow streets of the medieval street pattern and the covered walkways of the Market, the taller tower element would be largely screened from view in the Conservation Area, only appearing in three of the Identified Views noted in the CA SPD.

329. View 7 identified in the SPD is of the eastern portal to the Market, looking west along Leadenhall Place, from the southern base of the Lloyd's Building. In this view, the eastern Market buildings are largely seen against clear sky, but for the upper storeys of the existing building at 85 visible above the Market's eastern portal, and the glazed tower of 1 Leadenhall Court forming a prominent modern bookend to the north. In the baseline scenario, as with the consented scheme the proposal would form a prominent, dynamic new feature of this view, with its sculpted, serrated form rising up directly behind the Market. Its pale masonry architecture would add incident and interest to the view and would form a dynamic contrast with the glazed geometry of 1 Leadenhall Court to the north.

330. The proposal would be perceived as part of the consolidating Cluster, disassociated from the buildings at ground level, an impression reinforced in the cumulative scenario by the glimpsed presence of the upper levels of 70 Gracechurch Street to the south. It is therefore considered that the proposal in this view would reinforce the contrasts in scale identified in Attribute 4 of the SPD.

331. View 8 identified in the SPD is representative of the experience of looking north up Gracechurch Street at the western portal to Leadenhall Market. In both short and long views looking north, the Market and its neighbouring buildings on the eastern edge of

Gracechurch Street, including the proposal site, are seen against the backdrop of existing Cluster towers identified in Attribute 4. In this view, in the baseline scenario, the enhanced, rebuilt façade of the existing building, with new views into the Public Hall beyond, would form a complimentary neighbour to the existing Market portal and Nos. 81-82 Gracechurch Street to the south. The greened parapet edge to the proposals would introduce a welcome degree of softness and planting into this urban environment, while the lower stages of the tower, above, would be read as part of the wider Cluster of tall buildings, somewhat disassociated from the CA.

332. This latter impression would be intensified in longer views from further south on Gracechurch Street, where, as with the consented scheme, the tower's distinctively sculpted form, pale masonry architecture and extensive greening would be seen as a prominent, high-quality new addition to the Cluster, visually assembling with but architecturally distinct from 1 Leadenhall Court, 122 Leadenhall Street and the other towers established in this view. In the cumulative situation, the consented form of 70 Gracechurch Street would appear with and partially mask the proposal, reinforcing this sense of it being a distinctive new addition to an established Cluster.

333. View 16 identified in the SPD represents the experience of looking north from Lime Street/up Lime Street Passage at the Market buildings. Lime Street Passage is framed on both sides by the frontages of the Market, perceived against a backdrop of either low-rise buildings (including the upper storeys of the existing building on the site) or open sky, and terminates in the southern Market portal, dramatically juxtaposed with 1 Leadenhall Court, 22 Bishopsgate and other towers established in what is now an iconic view. Immersed in the fine-grain, historic scale, materiality and architecture of the Market, this street can be said to represent the conservation area's heart; furthermore, it is the place from which Attribute 4 identified in the SPD might best be appreciated.

334. In the baseline scenario, the proposal would form a very prominent new feature of these views. It would rise dramatically behind the range of Market buildings fronting Lime Street Passage in a manner at ease with some of the sublime contrasts in scale an inherent aspect of the Conservation Area and its immediate setting. The walkway at level five would be a prominent new feature above the Market buildings forming a dynamic, immediate backdrop to them. The cranked horizontals and fluted mullions of the pale masonry architecture would have visual affinities with those of the Market buildings, while the planted balconies on the east elevation would add softening and further visual interest.

335. As with the consented scheme it is considered the greatest impact on the Conservation Area would be when viewed from Lime Street Passage from as far back as the junction with Lime Street, though it would be, on the whole, relatively fleeting, transitory, in the oblique and at a high level. It would be mitigated further by the highly modelled lower stages of the rear elevation, which would subtly fan out as it rises, the tight urban grain, intricate street dimensions and arresting vibrancy of the foreground market streetscene. It would remove those current parts of the site which detract from the Conservation Area, replacing unconvincing architecture by reason of its expedient, incoherent and cluttered appearance, with coherent, high quality architecture.

336. Historic England consider the CA relies on a balance between the historic street frontages and the buildings outside the CA of markedly different scale and character, whilst recognising that some of these juxtapositions are positive and others are not, depending often on proximity and physical relationships. Whilst Officers, for the reasons stated, don't consider the Conservation Area relies on those juxtapositions, or that the balance is a delicate one, it is agreed that some are positive and that this relies of judicious analysis having regard for the site-specific circumstances.

337. As with the consented scheme, it is considered that the proposed building would be appreciated as part of a dense, close-knit backdrop of tall buildings, experienced in distinct juxtaposition but immediate proximity, where the strength of the juxtaposition often reinforces the scale of both causing them to be read as distinct. It is the impact of the entire proposal which is to be considered, noting the overall reduced height of the proposals and reduced depth to the walkway over the market buildings. Given the visual weight and relative proximity in this particular instance, whilst some slight harm could be caused, it is considered that the replacement of the poor-quality backdrop would nullify this brief incident with a countervailing benefit, resulting in the entire proposal having a neutral impact on the significance of the conservation area.

338. View 5 of the SPD is discussed for completeness, provided in view 3 to the HTVIA. This view is of the north portal of the Market, looking south from Leadenhall Street along Whittington Avenue, framed to the east by the former Iraqi Bank and to the west by 1 Leadenhall Court. 1 Leadenhall conceals the proposals from view. The proposals can therefore be understood as compliant with the consented character of the view, seen as part of an assembly of new buildings within the market's immediate surroundings.

339. The City of London Conservation Area Advisory Committee (CAAC) consider that the proposal, as with the consented scheme, would represent significant overdevelopment

of a constrained site, lead to the substantial loss of character to the CA. The CAAC do also note the overall reduction in height and improved public offer and redesign of level 5 and planting in particular. The CAAC characterise the proposals as creating a 'loss of character' which damages the setting of the market. In response officers note that, while the main frontage of the site retains some sympathetic details, the upper floors and roofscape have been found to negatively intrude into the otherwise high architectural quality of the surroundings, by virtue of their indifferent design and 'back of house' character. Through the sensitive restoration and rebuilding of the principle frontage and ground floor elevations, those qualities of the existing building of positive 'character' which contribute to the setting of the market and the wider conservation area would be preserved. In addition, the composition of the proposals have also considered the appearance of the site in the round, such that the present incidental quality in views from the east are resolved and replaced with a composed, intentional architectural design.

340. Historic England (HE) considered that the proposal would overshadow the top-lit arcades of the market. As with the consented scheme, detailed technical studies have been undertaken which have found that there would be a negligible/imperceptible impact on lighting levels to the Market, addressed elsewhere in the report. Thus, it is not considered that harm will arise in this respect of the conservation area.

341. Historic England holds that the proposed tower would detract from the prominence of the market, its roofscape and other surrounding historic buildings, the result of overshadowing and a dramatically different scale as to the general scale of the CA. It found the harm would equate to the level stated in their previous objection for the consented scheme, which officers therefore infer is less than substantial, and low to moderate in the range of such harm. For the reasons set out in above this assessment, whilst paying considerable importance and giving substantial weight to views of HE, officers disagree with the harm assessment.

342. Officers consider that on balance the unique spatial qualities of the CA, combined with the particular significance and proposed enhancements, would be preserved, and enhanced to a modest degree, and this is a matter of great weight.

343. The GLA has also considered that a high degree of less than substantial harm would arise from the loss of the existing building, notwithstanding the revised scheme's height and overall form is considered an improvement upon the extant permission . Officers disagree and consider on balance that the conservation area would not be harmed as a result of this and would be preserved, with modest enhancement.

344. The proposal would have a neutral impact on those identified elements of setting contributing to significance. In terms of those positive contrasts in height and scale, which often conjure a sense of the sublime, it is considered the proposal would not detract and could add to this unique spatial aspect of the CA, at the heart of the City Cluster. In terms of that relationship with the Bank Conservation Area on the opposite side of Gracechurch Street, either in baseline and cumulative scenarios, the retention and restoration of the principal façade, and the established backdrop of tall buildings, would mean that relationship would be preserved. Overall, the modest contribution of setting to the significance of the CA would be preserved.

345. On the basis of the impact assessment set out in the preceding paragraphs, Officers disagree with HE's, the GLA's and the CAAC's conclusions. The proposal would be a considered and design-led scheme which has resulted in the long-term optimisation of uplift relative to strategic heritage constraints, and which has successfully taken opportunities to preserve and enhance the Leadenhall Market Conservation Area. The often-indistinguishable immediate backdrop of the City Cluster is inescapable and a component of the significance of the CA. Overall , it is considered that the CA, as a whole, would be enhanced to a modest degree within both the baseline and cumulative scenarios.

Leadenhall Market (Grade II*):

346. The site adjoins, and shares party walls with, the grade II* listed Leadenhall Market. A separate application for listed building (25/00548/LBC) for the party wall works has been submitted.

Significance

347. 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.

348. 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.

349. 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.

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

Contribution of Setting

351. 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.

352. 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.

353. 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 Historic England's List Description describes as ''wonderfully incongruous'' with some complementary 'nods'. This makes a modest contribution to significance and an appreciation of it.

Impact

354. Historic Englanin their representations consider the proposals would detract from the prominence of the market buildings through the addition of height.. For reasons set out in the assessment above and below, officers consider this change in scale to be an established part of the of the building's setting and this includes an immediacy to how this change is experienced.

355. Officer's note the GLA considers the amended scheme has resulted in a 'simpler', 'more elegant' form, with improvements to the transition between the podium building and tower above, including the level 5 walkway, but conclude a middle degree of less than substantial harm to the market buildings. The designs have been specifically tested through the pre-application process to minimise the visual intrusion of the scheme, so that direct views towards the entrance pediments remain unencumbered. This ensures the sense of arrival into the market is preserved. Further to this, while it is acknowledged the walkway would be a prominent new feature seen above the Market buildings, the soffits have been designed to form a backdrop feature to them, and sympathetic rather than competitive in impact.

356. Historic England consider the proposals will overshadow top-lit arches compromising the architectural character. Officers disagree with this conclusion. The technical studies of the scheme's daylight/sunlight impacts, set out elsewhere in this report, find that a fractional and imperceptible difference in the Market's internal light levels would result. Officers consider a fractional difference in aforesaid light levels would preserve the significance and special architectural and historic interest of the listed building.

357. While the main frontage of the site retains some sympathetic details, the upper floors and roofscape have been found to negatively intrude into the otherwise high architectural quality of the surroundings, by virtue of their indifferent design and 'back of house' character. Through the retention of fabric to the ground floor, those qualities of the existing building of positive 'character' which contribute to the setting of the market and the wider conservation area would be preserved. In addition, the composition of the proposals have also considered the appearance of the site in the round, such that the present incidental quality in views from the east are resolved and replaced with a composed, intentional architectural design.

358. The chief impact would be indirect, via change in the setting of the listed building. In views of the main west portal to the Market, the rebuilt, reimagined Gracechurch Street façade of the proposal would form a complimentary adjunct, harbouring compelling views

of the Public Hall beyond; similarly, in views of the west range of Market buildings along Lime Street Passage, the proposed east entrance to the Public Hall would offer oblique glimpses into the Public Hall. The reinstated historic east-west route kinked through the Public Hall would elide with the spirit of the Market's conception as a formal space on an informal alignment. The sequence of gathering spaces and routes within the immediate orbit of the listed building would be enriched in line with the genius loci or spirit of the place. The glimpses and views of the new gathering-space in the Public Hall would further enrich the fine grain hive of related commercial activities at the heart of the character of the market complex.

359. In longer views north and south along Gracechurch Street, the main west portal is already a comparatively diminutive presence, seen against a wider backdrop of modern tall building development. The proposal would reinforce this existing dynamic and would have a somewhat benign impact on the setting of the listed building in these views.

360. In baseline and cumulative views of the eastern and southern market portals along Leadenhall Place and Lime Street Passage the proposal would form a prominent new feature, rising directly above and occupying previously clear sky above the Market buildings. It is acknowledged that the proposals introduce a marked change of scale within the site, and that the site is located in close proximity to the listed building. However it has been established that this change of scale is a currently appreciable characteristic of the setting to the listed building. Secondly, this proximity with tall buildings has been successfully leveraged to achieve an architectural drama found to be of benefit to the market's existing setting and significance. For example, the juxtaposition between market and Grade I Lloyd's Building is accepted as a positive counterpoint in the surroundings. It is also noted the architectural interest of the building is not reliant on a perception of its prominence within the streetscape, rather views to the market are overwhelmingly characterised by its sudden 'unveiling', as the entrances into the market come into view within the narrow lanes to the east.

361. Officers do accept however that, consistent with the impact to the conservation area outlined above, the contiguity of the site and listed building, could cause some slight harm, through the proximity and visual weight of the proposals. As stated previously, the viewpoints where this harm arises are considered fleeting, transitory and oblique, limited by the intricate urban grain of the surroundings which allows only unfolding rather than distant views. Furthermore, the proposals have been found to resolve the existing harmful contribution of the site's incidental and cluttered upper levels, replacing these

with a composed, intentional high-quality design. Fundamentally it is considered that when taken together, these brief incidences of harm would be nullified with a countervailing benefit, resulting in an overall neutral impact in this instance.

362. Overall, in both baseline and cumulative scenarios it is considered the proposals would preserve the significance and special architectural and historic interest of the listed building and the contribution made by setting to that significance and an appreciation of it.

Church of St Michael Cornhill (Grade I)

Significance

363. Church of 1670-77 by Sir Christopher Wren, with tower of 1715-21 by Nicholas Hawksmoor and High Victorian remodelling of the interior by Sir George Gilbert Scott. The only parts of the exterior visible are part of the south elevation, the west elevation and the north elevation and base of the tower. The rest is obscured by neighbouring buildings. Wren's body of the church is of Portland stone in his classical style incorporating round-arched windows to the south elevation. Contrastingly, Hawksmoor's tower employs the gothic style to striking effect, in four muscular stages and culminating in four richly modelled polygonal pinnacles with ogee caps and glittering finials. From a surviving drawing of the tower dated 1421, it is clear that Hawksmoor's design for the new tower perpetuates the outlines and style of the old one with only minor differences. To the tower's northern foot is a gothic porch by Gilbert Scott.

364. The building is of very high architectural/artistic interest: for the striking juxtaposition of Wren's classical and Hawksmoor's gothic architectural languages, for the very high calibre of the designs and quality of execution of the building in general, and for Hawksmoor's forceful, idiosyncratic and charismatic interpretation of the gothic style present in the tower, which perpetuates the appearance of its predecessor on the skyline. The building is of very high historic interest: for the associations with the aforesaid architects, stellar names in British architectural history; for its status as a long-lived descendant of an ancient, medieval foundation upon the site of the Roman Forum-Basilica; and for its associations with generations of past City communities, including many notable individuals such as Robert Yaxley, King Henry VIII's physician, buried in the church in 1540. The vast majority of that significance is contained in its physical historic fabric and fixtures and fittings, albeit some significance is drawn from setting.

Contribution of Setting

365. The church is framed on all sides by the bustling historic townscape of the Bank Conservation Area, averaging five storeys in height and dating from the C18 to the present day. Because of the dense, built-up surroundings, only from the churchyard and St Michael's Alley to the south can views of both tower and church be obtained, contributing to its architectural significance. Otherwise, views of the north elevation from the tower can be obtained directly opposite on Cornhill, while the upper stage and pinnacles form a memorable townscape set piece in views east, and to a lesser extent west, along Cornhill. The junction of Cornhill with Royal Exchange Buildings offers a moment to appreciate the pinnacles of the church in an oblique view soaring above the commercial buildings on gently rising land towards one of the City's two hills, Cornhill.

366. Surrounded by historic buildings of a grand but generally lower scale than the tower, the immediate setting of the church in all directions makes a strong contribution to its significance by maintaining the townscape relationship of lower secular buildings and higher ecclesiastical tower that would have prevailed since it was founded. The layering of variable historic plot shapes and architectural treatments, and the fine grain of the medieval street pattern here, all add richness and incident which evoke the preceding centuries of the church's existence and status within its parish and the wider City. These make the strongest, moderate, contribution to significance and an appreciation of it.

367. The views of Hawksmoor's elegant pinnacles, closely resembling their medieval predecessors, rising above the historic commercial frontages lining Cornhill is considered to be a quintessentially 'City' juxtaposition of ecclesiastical grace with commercial grandeur. As such, views of the church eastwards along Cornhill are considered to make a strong contribution both to its architectural and historic significance, especially from the junction with Royal Exchange Buildings, where the pinnacles can be appreciated in their fullest against clear sky.

368. The historic townscape surrounding the church extends for some distance to the west, south and north as the Bank Conservation Area. To the near east, across Gracechurch Street, the City Cluster provides a dynamic modern backdrop of towers to the eastern parts of the Bank Conservation Area of which the church is part. In some of those Cornhill views, particularly from Bank Junction and the commencement of Cornhill, the church's pinnacles are seen against 1 Leadenhall Court and the other modern towers of the Cluster. While this element of setting results in an established, dynamic juxtaposition

between old and new, it is considered to make only a neutral contribution to the significance of the listed building.

369. As well as this local setting, the church's pinnacles can be appreciated from riparian bridge view from the south and west, from Waterloo and Hungerford Bridges, as part of a wider skyline ensemble, albeit against the backdrop of the City Cluster These views are considered to contribute to the significance of the church by illustrating its status as part of a 'family' of City churches. These make a lesser contribution to significance overall.

Impact

370. The GLA consider the proposals to result in less than substantial harm, at a middle level. . While the proposals are lower in height in comparison to the consented scheme, HE considers some less than substantial harm would arise here, where the sky-etched silhouette of the tower would be in part backdropped by the proposal.

371. In views of the church looking east from Bank Junction and the commencement of Cornhill, the proposal would be backdropped by 1 Leadenhall. Officers agree but note that HE did not claim harm would be caused to the church in their formal response on 1 Leadenhall, which is closer and more prominent in the backdrop than the proposal. Nevertheless, Officers agree the transitory moment, described as an incident by HE, around the eastern edge of Royal Exchange Buildings is the best place to appreciate the church in the near setting.

372. Moving east along Cornhill, the proposal would draw closer to the church's pinnacles, and colliding with them at the junction with Royal Exchange Buildings. The proposal's pale masonry architecture, which otherwise would be a positive quality in many views, would here unfortunately blur the silhouette of the pinnacles and detract from (i) the ability to appreciate them as an integral architectural composition and (ii) puncture the composition of church pinnacles with commercial buildings below and the clear sky behind.

373. The resultant impact is considered by Historic England to reflect the same as the consented scheme, which officers therefore infer as less than substantial harm, falling within the middle of the range. t HE has stated this is in part due to the quality of the existing views of the church tower, which HE considered to be the most advantageous in respect of appreciating the church's significance.

374. Officers note however that these impacts are appreciated as a fleeting moment; that the experience of viewing the church whilst moving east along Cornhill is a kinetic one; and that the City Cluster is an established, dynamic backdrop feature that frequently results in arresting contrasts. It is further acknowledged that other views of the tower against clear sky would remain unaffected, including from directly north opposite on Cornhill and from the churchyard. Nevertheless, such is the contribution of the view from Cornhill/Royal Exchange Buildings to the church's significance that it is the view of officers that the proposal would cause a low level of less than substantial harm to its significance, in particular an appreciation of it, taking into account all mitigating factors hitherto outlined, including both baseline and cumulative scenarios.

Tower Bridge (Grade I)

Significance and Contribution of Setting:

375. Bridge of 1894, engineering by Sir John Wolfe Barry and architecture by 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, clothed in revivalist French gothic towers, turrets and pinnacles. The dramatic symmetrical composition acts as a 'portal' to central London from the River and has become an iconic and internationally recognised landmark of London.

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

Impact

377. The GLA consider the proposals would result in less than substantial harm, at a low level , due to changes within the wider setting. Officers note this is an improvement upon the previous level of harm identified by the GLA. This is addressed below. The proposal would affect those views of Tower Bridge from the South Bank of the River from the east looking west. From Butler's Wharf, in the baseline scenario, the proposal would partially infill the sky gap between 20 Fenchurch Street and the northern tower of the Bridge. This

further erosion of sky in the open 'picture frame' of the Bridge between the iconic towers undermines its composition and role as the 'gateway' to central London, drawing the Cluster further south-west into the iconic 'picture frame' between the twin towers. As such, the proposal would cause a limited degree of harm to the setting and therefore the significance of Tower Bridge.

378. The impact reduces on the approach to the Bridge, which becomes more prominent as the observer moves closer, until it commands and dominates the foreground. Given the very limited extent of the impact, its transiency, the significant distance of the proposal to the west and the relative significance of this viewing platform, the proposal overall is considered to cause a slight level of less than substantial harm to the significance of Tower Bridge, very much at the lowest end of the spectrum, within both baseline and cumulative scenarios.

The Monument (Grade I and Scheduled Ancient Monument)

Significance and Contribution of Setting

379. Monument of 1671-77, by Sir Christopher Wren and Robert Hooke. The Monument to the Great Fire 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, the largest free-standing classical column in the world, crowned with a gilded flaming orb, supported atop a large cuboid pedestal bearing inscriptions and bas-reliefs describing the circumstances of its conception. The Monument is of exceptional architectural/artistic and historic significance as a City/London-wide Landmark.

380. 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, forming part 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

381. The GLA consider the proposals would not result in any harm to the Monument, and officers note this is an improvement over the consented scheme. .

382. Viewed from the South Bank, the proposal would, in the baseline scenario, be perceived at some remove to the north-east, leaving the setting of the Monument untroubled. Looking north along Fish Street Hill towards the Monument, in the baseline scenario, the proposal would appear far in the background, part of the Cluster, and would not encroach upon the silhouette of the Monument; in the cumulative scenario it would be almost entirely occluded by the consented form of 70 Gracechurch Street.

383. Similar to views along Fish Street, views from the viewing gallery at the Monument looking towards the site presently take in the City Cluster. Noting the lower height in comparison to the consented scheme, the proposals will sit entirely within the envelope and sky silhouette established by the existing buildings of the Cluster.

384. Accordingly, the proposal would preserve the significance and setting of the Monument as a grade I listed building and Scheduled Ancient Monument within both baseline and cumulative scenarios.

St Peter Upon Cornhill (Grade I):

Significance and Setting:

385. The significance of the building is exceptional, forming one of the post Great Fire city churches designed by Sir Christopher Wren, and consequently illustrative of his transformative works across the City during that period. The significance of the listed building stems from its high architectural and historic interest as a seventeenth century church. The retention of the lower parts of the medieval tower amplifies the historic rarity value of the fabric, and this is complimented by the expressive classicism of Wren's later façades. Damage to the ground floor frontage to Gracechurch Street is evident, detracting from the otherwise decorative appearance of the building.

386. The setting of the church is unusually secluded, making a range of contributions to the significance of the listed building. Despite being located on a major thoroughfare, there is no access from the church onto Gracechurch Street, so that while the historic character of the eastern elevation is visible, a full appreciation of its significance is not readily achieved in views from the east. Shopfronts obscure the majority of the northern

elevation, aside from a small projecting entrance at ground floor. The most complete views of the building are from within the church yard to the west of Gracechurch Street. This is almost completely enclosed, and accessed only by the narrow St Peters Alley, a small lane thought to date to the Saxon occupation of the City. The immediate setting of the church therefore comprises this yard, with separately listed wrought iron gates (Grade II) creating group interest. The verdant and enclosed quality of the yard makes a positive contribution to the setting of the listed church, as do the glimpsed views of the tower seen from along Cornhill, sign posting the church's location at a topographical high point.

387. As existing, the site is not visible in views within the church yard, but the eastern elevation of the church is seen together with the site, in views south along Gracechurch Street, also taking in the taller buildings of the cluster further to the east. Overall, the site is considered to make a neutral contribution to the setting of the church.

Impact:

388. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting.

389. The technical assessment of the scheme's daylight and sunlight impacts, set out elsewhere in this report, has found that the church would experience a small drop in daylight/sunlight levels. This would be via the stained-glass windows in the east and south elevations, both of which date to the nineteenth and twentieth centuries of the church's existence. It is considered that the decrease would be modest and imperceptible to those experiencing the church's interior and would not affect an observer's ability to appreciate the stained glass windows, preserving the significance of the church.

390. While the proposals will be visible in views south along Gracechurch Street and seen together with the eastern elevation of the church, this is not considered to alter the existing contribution of this view to the listed building's setting, which is already defined by a sense of contrasting architectural character, materiality and scale. It is further noted that the consented scheme to 1 Leadenhall, will be visible in views from the church yard, as well as heighten the sense of contrast to each side of Gracechurch Street. The former churchyard is well contained and enclosed, to the extent the outside world is peripheral to the experience. Therefore officers disagree with the GLA, finding that within this context the proposals are considered to constitute a neutral impact to the setting of the listed church, retaining the existing dramatic change in scale currently appreciable in the

wider surroundings at a high level. The significance and setting of the church would be preserved within both baseline and cumulative scenarios.

Lloyd's of London (Grade I) together with Nos 12 & 14-19 Leadenhall Street (Grade II):

Significance and Contribution of Setting:

391. Designed by Richard Rogers & Partners and completed in 1986 Lloyd's of London retains very high architectural significance, as the pre-eminent example of the 'Hi-Tech' design movement of late Modernism. The building's innovative steel and concrete material expression and flexible planform further amplifies this interest, recognised as one of Rogers' most influential works. Additional historic interest resides in the association with the Lloyd's firm, and the conservation philosophy which resulted in the rehousing of the 'Adam Room' within the new building, comprising an eighteenth-century Robert Adam interior. Similarly, the integration with the retained Nos. 12 and 14-19 Leadenhall Street, built in 1928, designed by Edwin Cooper and separately listed grade II also creates significant group value. The latter reflects the remains of the last headquarters built on the site and comprises a colossal Portland Stone doorway, with coffered dome semi dome above, joined to a grand five storey façade decorated by rusticated piers and Doric entablature.

392. The Lloyd's Building's immediate setting can be generally categorised as fortuitous, defined by a sense of variety and contrast. It is noted however the design of the building is responsive to the Grade II* Leadenhall Market, located immediately to the south-west, with a central glazed atrium playfully echoing the construction and material palette of the Victorian market. The relationship between the two buildings however is chiefly one of extreme counterpoint, with regards to both character and height, and the group value described as ''wonderfully incongruous''. There is some group value in the relationship between Lloyd's and the emerging Cluster of tall buildings it was designed to consolidate, in particular with the Leadenhall Building opposite, which represents the development in the practice and style of the same influential architectural practice.

Impact:

393. The GLA previously found low to middle less than substantial harm to the significance of the Lloyd's Building.

394. The tall buildings of the City Cluster are located immediately to the north and northeast. These rise substantially above that of the listed building, as seen in more distant views of the Cluster from the south, as well as experienced at street level, particularly from the junction with Lime and Leadenhall Street. The upper storeys of the site are currently visible in views from Lloyd's towards the Market, seen above the stone pediment of the eastern market entrance. These existing glimpses are incidental in quality, taking in the poor-quality rear façade of the current site which detracts, albeit only slightly, from the view.

395. The proposal is beyond the Leadenhall Market to the southwest and would add to the baseline and cumulative backdrop of tall buildings in a dense Cluster which are at the heart of the genius loci of the place. The clear and strong juxtaposition between Lloyd's and the market would remain undiluted by the more distant presence of another tall building.

396. This dense relationship and strong juxtapositions with the surrounding Cluster would be maintained by the proposal, in particular the group relationship with the Leadenhall Building which would be undiluted. The Lloyd's Building would remain appreciable from the Garden at 120 Fenchurch Street, with the proposed building standing clear of Lloyd's to the south in this view.

397. The Lloyd's building is presently partially visible from a number of viewpoints along the river and to the west, appearing comparatively diminutive against its taller neighbours within the Cluster.

398. In the proposed scenario, in view 22 (Tate Modern Blavatnik Viewing Gallery) of the HTVIA the listed building would remain visible, with the proposals seen adjacent to the listed building. As such the existing contribution of this view to the setting and significance of the listed building is considered to be preserved, remaining consistent with the perception of the Lloyd's Building within the tall building cluster. This relationship is changed with the cumulative scenario, with Lloyd's being mostly occluded; however, this is not caused by the proposals.

399. Within views 24 (Blackfriars Station), 25 (LVMF 16B.2), and 26 (LVMF 15B.2), the listed building is partially visible, the glazed atrium just distinguishable in front of the Scalpel. However, it should be noted that the distant quality of these views and the limited amount of the building that can be seen in these views in the context of the dense cluster limits their contribution to the setting and significance of the building, with the

building only identifiable through extreme magnification. The proposals would completely occlude the listed building within these views, resulting in a loss of visibility. However, given the negligible contribution of these views to the setting and significance of the listed building, the resultant impact to significance is considered to be neutral. The listed building would also be fully occluded in the cumulative scenario by other consented schemes.

400. From view 29 (St Paul's Golden Gallery) the listed building is more visible, with its western elevation clearly appreciable albeit within the context of the dense cluster. In this view, the proposals would not impact upon the visibility and appreciation of the listed building from the Golden Gallery,

401. Overall, officer's disagree with the conclusion of the GLA finding that the proposal would preserve the significance and setting of the Lloyd's Building and those of 12 & 14-19 Leadenhall Street which are intrinsically related to one another in a manner and to a degree similar to the consented scheme within both baseline and cumulative scenarios.

Southwark Cathedral (Grade I):

Significance

402. Southwark was for many centuries the only substantial settlement on the south bank of the Thames and situated at the end of the only bridge crossing the river. The original minster and subsequent priory would have been a source of hospitality and accommodation, supplemented over the succeeding centuries by the many inns and hostelries along the adjacent Borough High Street that catered for travellers to and from London. The role of the priory would therefore have been central to the identity and character of the area and its physical presence would have once been much more visually prominent than is the case today. Following the Dissolution, the role of the building as a parish church for an area with a constantly shifting population was slightly different to many others and by the 19th century it was in a very poor condition. It was in danger of demolition to accommodate the new railway infrastructure being introduced into the heart of the capital. The retention and restoration of the church in the 19th century by Gwilt is a key chapter in its history and is obviously expressed architecturally by the embellishment of the crossing tower. The establishment of a new diocese and the award of Cathedral Status in 1905 elevated the ecclesiastical significance of the building in an echo of its former medieval importance so that it now has a significant and substantial role in supporting the varied communities of the area.

Contribution of Setting:

403. The original setting of the then Priory, and later cathedral, comprised the lower inter-tidal stretches of the Thames to the north with the church atop higher ground. The historic crossing of the river, for many centuries the only one in the capital, was a major structure to the east leading to the spine of Borough High Street and its tight urban grain of courts and yards. Although physically separated by its precinct walls from the High Street and the market, the Priory would have been visible in the surrounding areas to east and west until the nineteenth century when the development of significant warehousing, industrial and commercial buildings, many of which were associated with the Port of London to the north, radically changed the setting and visibility of the church. To the east the introduction of the railways elevated above the existing buildings of the High Street and passing in close proximity to the south of the church further isolated it visually from parts of its setting. The visual connection between the church (later cathedral) and the Thames was important historically and continues to make an important contribution to an appreciation of the church, enabling an understanding of its strategic location and the connections between the north and south banks of the river. Changes to the setting of the Cathedral in the 20th century including the creation of Montague Close and Minerva Square has reinforced those connections and provide new views that contribute to the appreciation of the architectural and historic significance of the building. These changes enable an experience of the Cathedral from a quiet public square immediately adjacent to the river which is in contrast to the remainder of the setting of the Cathedral which is busy, noisy and vibrant in parts. The creation of the square and the trees along the northern edge identify the space in mid-distance views from the other side of the river and draw the eye towards the Cathedral tower, seen for the most part against a clear sky and appreciable as an historic landmark.

Impact:

404. View 19 of the HTVIA shows the upper part of the tower of Southwark Cathedral, partially seen in the mid-distance, above the western side of Borough High Street. The buildings of the high street, which gently curves east, prevent full views of the tower of the Cathedral, and in addition, a backdrop of tall buildings is created through sight lines towards Tower 42, 22 Bishopsgate, 6-8 Bishopsgate, and the emerging 1 Leadenhall Street. These buildings are visible behind the tower spires, reaching halfway across the tower's width. The proposals would be visible in this view, seen as part of the existing distant tall building cluster. While this would create a change in the backdrop, this is not considered to dilute the prominence of the tower as presently experienced. The proposals would be appreciated very much in the distance, consolidating the appearance

of the City Cluster and remaining within its visual built envelope. The overall impact to the significance of the listed building is therefore considered to be neutral, with no change in the contribution of its setting within both baseline and cumulative scenarios. This is the same as the consented scheme.

81-82 Gracechurch Street (Grade II):

Setting and Significance:

405. 81-82 Gracechurch Street is a good example of a later 19th century purpose-built office building in the Italianate manner, faced in well-detailed Portland stone. A style then associated with dependable business and finance in a City manner, it reincorporates a much older alley and a ground floor parade of shops. Its principal significance lies in its architectural design including façade details of the Gracechurch Street elevation and potentially its interiors. It's subservient secondary facades to Bull's Head Passage survive well, but are more subtle, of traditional white glazed brick and large tripartite sashed windows to optimise light in a dense setting, are of secondary interest. In the main, significance is drawn from the external architecture and plan form. To a lesser extent does it draw on setting.

406. The building's immediate setting makes a positive contribution of two kinds to the significance of the listed building. Firstly, the building is experienced as a small group of classically detailed Portland stone buildings located on the opposite side of Gracechurch Street. The Lombardy classism exhibited along Lombard Street in particular is considered to establish the sense of a shared architectural decorative language, which sympathetically contextualises the architectural interest of the listed building. The second contribution, albeit to a lesser extent, is the proximity to the western entrance of Leadenhall Market, with its red brick and Portland stone facades seen together with the listed building from the south and north along Gracechurch Street. The character of the market, with its fine-grained commercial buzz, reinforces the sense of activation of the ground floor commercial units within the listed building. Views of the market and listed building terminate in the tall façade of the Scalpel, which together with the modern building at No 20, break above the established building line. The immediate setting is therefore characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings seen alongside and behind.

407. The site is located immediately adjacent to the north and contributes positively through the materiality and decorative detail of the second and third storeys of its façade. The

roofline of the site terminates significantly above that of the listed building in a series of stepped additions. This roofscape is seen together with the listed building in views north south along Gracechurch Street, undermining this otherwise positive contribution. Similarly, the modern shop fronts and frontage at ground floor of the site appear rather plain and detract from the more evident decorative detail of the surroundings.

Impact:

408. The GLA have commented that the proposals would create less than substantial harm of a low to middle level, to the listed buildings..

409. A separate listed building consent application for works at the site boundary between the two will be assessed under reference 25/00548/LBC.

410. The development would be prominent in views south-west and north-east of 81-82 Gracechurch Street, with the massing of the development highly visible above the roofline of the building. The retention of the façade to no 85, together with the proposed restoration of decorative detail conserves the positive contribution of the site and resolving the rather plain appearance of the ground floor. While visible, the tall building addition is considered typical of the existing backdrop setting, which as existing features dramatic change of scale. Therefore, officer's disagree with the GLA conclusion, finding the settinto not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unharmed, as per the consented scheme within both baseline and cumulative scenarios.

Former Ship Tavern, Lime Street (Grade II):

Significance and Contribution of Setting:

411. The Classical mid-19th Century public house is located east of the application site in Lime Street and is of architectural and historic interest, through its characteristic stock brick upper façade and traditionally proportioned and detailed frontage below. On the main, significance is drawn from the physical fabric and prominent principal elevation to Lime Street, and to a lesser but still significant extent from setting.

412. 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 (View 5a). The rear elevation of the site as existing is seen from the listed building rising significantly over the market. These views appear incidental and utilitarian, creating a 'back of house' character which detract from the views towards the market.

Impact:

413. The GLA consider the proposals would result in less than substantial harm, at a very low level due to a change in backdrop and intervisibility with the listed building.

414. The high-quality architecture of the proposed building would replace the existing poor quality rear facades of the existing building in the wider setting, albeit appreciated peripherally to the experience of, the Ship Tavern. While it is acknowledged the visible extent of the site would increase, this is consistent with the wider character of the listed building's setting, which presently takes in a number of tall buildings. Therefore, the setting is found to not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed, both from the existing situation and the consented scheme and cumulative scenario.

7-9 Gracechurch Street (Grade II):

Significance and Setting:

415. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style, creating high historic and architectural interest. It is located on the west side of Gracechurch Street opposite the application site. Its wider setting features a mix of buildings in age, materials, style, and height, retaining a group value with a number of Portland Stone fronted buildings in the immediate surroundings. The building enjoys a green setting to the rear set around Castle Court.

416. As above, the existing site contributes positively through the materiality and decorative detail of the second and third storeys of its façade. The roofline of the site however terminates significantly above that of the listed building in a series of stepped additions. This roofscape is seen together with the listed building in views north-south along Gracechurch Street, undermining this otherwise positive contribution. Similarly, the modern shop fronts and frontage at ground floor of the site appear rather plain and detract from the more evident decorative detail of the surroundings.

Impact:

417. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting.
418. The juxtaposition of heights and architecture, including the City Cluster of tall buildings has been found to form part of the character of the setting of this listed building. While the proposal would be highly visible in views east from the listed building, this is not inconsistent with the existing character of the surroundings, which already takes in a number of structures seen over the roofline. The enclosure to Castle Court is such that views of the listed building from this location are considered to be unaffected. Taken together therefore with the improvement to the reinstated façade, officers disagree with the GLA, considering this results in no adverse impact on the setting of the listed building and its contribution to significance within both baseline and cumulative scenarios, as the per the consented scheme.

Cannon Street Towers (Grade II):

Significance and Contribution of Setting:

419. The pair of towers at Cannon Street Station, at Cousin Lane and All Hallow's Lane, were built 1865-6 possibly by E M Barry and used to mark the junction of the train shed with the bridge. The brick towers feature open arched upper parts, square domed roofs with squat lanterns and spire. Their significance lies in their townscape landmark presence in river views, their architectural quality and functional association.

420. The setting of the towers is characterised by a mix of building styles, heights and periods, which allude to the substantial rebuilding along the northern bank of the Thames during the twentieth century. The riverside setting however makes a strong positive contribution, enabling the landmark quality of the station and its important contribution to its significance. The tall buildings of the City Cluster are seen in the wider backdrop, creating a dramatic composition in which the station towers appear as a prominent gateway.

Impact:

421. The change in scale within the site as a result of the proposal would not change the character of the backdrop setting, where the towers are appreciated with the tall buildings of the City Cluster seen directly behind. Therefore, while the proposals would be visible in views of towers, the proposal is not considered to detract from the setting of the listed

towers within both baseline and cumulative scenarios. The significance of the listed towers would not be affected by the proposals, as per the consented scheme.

Former Port of London Authority Building (PLAB), 10 Trinity Square (Grade II*):

Setting and Significance:

422. Built 1912 – 22 by Sir Edwin Cooper, this monumental Portland stone landmark building in the Greek classical style features a richly embellished tower. Its setting includes a broad range of buildings in terms of period, style, height and materiality. It forms part of the setting of the Tower of London and is a clearly identifiable landmark feature in river prospect views. Its significance lies in its architecture and historic Port of London civic function, and to a lesser degree its setting including the Tower of London.

Impact:

423. Views 11, 13c and 16 of the HTVIA show the proposed development would appear in views with the PLAB but would not obscure the existing appreciation of its silhouette or decorative detail, forming part of a backdrop of tall buildings within the City Cluster. The cumulative scheme further shows the proposals screened from view in views 11 and 13c, with the proposals seen as part of a gradual amplification of height within the City Cluster seen in view 16. Therefore, the robust architectural form and contrasting materiality of the PLAB when compared to the Cluster buildings would remain a prominent element in these views. There would be no harm to the setting of this listed building within both baseline and cumulative scenarios, or the ability to appreciate its significance, as result of the proposed development, as per the consented scheme.

Lloyds Bank, 39 Threadneedle St (Grade II)

424. Designed in the late nineteenth century by G H Hunt, the building is a stone classical building with rounded corner. Historic and architectural interest is created through elaborate decorative detail and the polychromatic effect of the oxford and Portland stone of the main façade. The building has a local landmark presence, holding a responsive character to the road junction. Its setting is varied, comprising the sombre Portland stone buildings to Threadneedle Street and the western side of Gracechurch Street. These are of a similar scale and decorative quality, creating a sense of consistency in the streetscape which underscores the listed building's architectural interest. In contrast, the tall buildings to the eastern side of Gracechurch Street, including 22 and 10 Bishopsgate,

possess a firm contemporary character and relatively monumental height, creating distinct duality and sense of drama within the surroundings.

425. The GLA has found a low level of less than substantial harm to the significance of the listed building through changes within its setting. This is addressed below.

426. The site is visible in views which take in the listed building from the junction, seen in the middle distance. These views include the front façade of the site as well as the stepped additions to the roof, creating a considerable mass of structure above the roof line. The proposals would be visible in these views (View 1 within the HTVIA) but seen and appreciated as a continuation of the tall buildings to the west. As such officers disagree with the GLA, finding that the proposals are considered to maintain the existing sense of duality appreciable within the listed building's setting. There would be no harm to the setting of this listed building, or the ability to appreciate its significance within both baseline and cumulative scenarios, as result of the proposed development, as per the consented scheme.

Royal Exchange (Grade I):

Significance and Setting:

427. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. Its historical use and commanding presence create a very high architectural and historic interest.

428. The setting of the listed building comprises the grand cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail. The Royal Exchange appears centrally within this composition, drawing the eye through its grand temple frontage. Views east from the junction take in, the tall buildings of the City Cluster seen in the backdrop. The duality of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building's setting. The overall contribution of setting to the significance of the building is high.

Impact:

429. The GLA have considered the proposals to result in less than substantial harm, ranging between a low to middle level of harm, due to changes in backdrop and intervisibility between this building and the site.

430. The site is presently not visible from the listed building, making a neutral contribution. The proposals would be seen in views east from Bank Junction taking in the Royal Exchange (view 31). In the baseline scenario, the site would appear part of the City Cluster, adjacent to the Scalpel. As such the proposals would appear consistent with the existing tall building backdrop setting. The isolation of the proposals in this view would be softened in the cumulative scenario, specifically seen together with 1 Leadenhall. Given the compliance with the existing setting, officers disagree with the GLA and it is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development, as per the consented scheme.

1 Cornhill (Grade II):

Significance and Setting:

431. 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. It is situated at the junction of Cornhill and Lombard Street and the surrounding heritage buildings of distinction make up its immediate setting and contribute to its significance. 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:

432. The GLA has found a low to mid-level of less than substantial harm to the significance of the listed building through intervisibility with the proposals and alterations to the listed building's backdrop. This is addressed below.

433. View 30 within the HTVIA takes in the dome of no.1 Cornhill looking east along Cheapside, taking St Mary-le-Bow into the view towards Bank Junction. The proposed development would appear in the background of this view, rising above the dome but only appreciable above and adjacent to other taller development that is presently seen

behind the dome. This is considered to make a neutral contribution to its setting compared with the existing context.

434. In view 31, looking east from Bank Junction, the view takes in the curved corner formed by no.1 Cornhill. The proposed development would appear in the background of this view, well away from its dome. The significance of the listed building and the ability to appreciate it are considered to be unaffected, with the proposals remaining identifiably part of the existing City Cluster of tall buildings which presently form a backdrop within this view. Therefore, it is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance within both baseline and cumulative scenarios, as result of the proposed development, as per the consented scheme.

3-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II*):

Significance and Contribution of Setting:

435. This group of listed buildings is seen to the southern side of Cornhill, comprising a sedate row of Portland stone buildings, with the exception of the pink and grey polished granite frontage to No 39.

436. 15-22 Cornhill is the largest building within the group, occupying a substantial plot. Built in 1927 by Sir John Burnet as the Lloyd's Bank Headquarters, the building is of much historic and architectural interest, awarded a RIBA award in 1932, with well-preserved interiors. The façade design has a palatial quality, with a series of double height arched windows at ground floor and giant order of Corinthian columns above.

437. The decorative treatment of the group varies, but each is of a consistently high quality and roof height, so that the sense of a cohesive eighteenth to early twentieth century townscape is appreciable. The close proximity of this cluster of listed buildings creates considerable group value, experienced sequentially and in longer range views east along Cornhill. The overall architectural and historic interest of the buildings are high.

438. The setting of the group includes the buildings around Bank junction, with a number of landmark structures such as the Royal Exchange and 1 Cornhill creating an emphasis to this important junction location. These buildings frame the view east along Cornhill, terminating in glimpses of the Lloyds Building and the Scalpel. Views west centre on No 1 Poultry, the grade II* postmodern building by Sir James Stirling. The tower of St Michael Cornhill is seen fleetingly above this group when walking east along Cornhill, creating a point of interest, and signposting the historic origins of the street. The City Cluster is also

seen in eastern views along this road, creating a backdrop that comes in and out of view as the viewer progresses east. The setting of the listed group therefore comprises the strong interrelationship between the buildings within the terrace, set against taller more modern buildings which terminate these views and appear within the wider backdrop.

Impact:

439. The GLA has found a lo level of less than substantial harm to the significance of the listed buildings through alterations in their setting, finding a low to middle level with reference to 13-14 and 15-22 Cornhill specifically. . This is addressed below**.**

440. The site is presently not visible from the listed group, as illustrated in view 31 of the HTVIA. The proposals would result in an increase in visibility, appearing above the prevailing building height of the group. This is however consistent with the existing character of the setting of the group, with the terrace experienced alongside views of tall buildings within the City Cluster. Officers therefore disagree with the GLA, finding the overall impact is therefore considered to be neutral. It is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance within both baseline and cumulative scenarios as result of the proposed development, as per the consented scheme.

Credit Lyonnais, 39-40 Lombard Street (Grade II):

Significance and Contribution of Setting:

441. Built 1868, by Frederic John and Horace Francis, this Portland Stone building is completed in an ornate Italianate palazzo manner. Comprising a tall ground floor, thought to be a former banking hall, the main facades are richly carved with classical detailing. It is of architectural, artistic and to a slightly lesser extent historical interest. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. A historic setting is better preserved along Lombard Street, but the overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the city cluster are seen to the north, including 6-8 and 22 Bishopsgate, further cementing a modern architectural character to the surroundings.

442. The site is seen obliquely from the listed building, visible within the middle distance of views north. It makes a low positive contribution to the setting and significance of the listed building, with the main façade seen forming a cohesive and attractive group with the neighbouring Portland stone buildings to either side.

Impact

443. The GLA considers that the proposal would result in less than substantial harm, at a low level, due to changes within its setting. .

444. The proposals would be appreciated in open northward views along Gracechurch Street; however, this would be viewed in the context of the existing office developments in the immediate setting, and tall buildings of the City Cluster in the background. The rebuilt façade of the existing building ensures the positive contribution that the site makes to the setting of the listed building is preserved. As such the proposals are considered to be consistent with the existing character of the setting of this listed building. Therefore, officers disagree with the GLA, finding no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street, within both baseline and cumulative scenarios as per the consented scheme.

445. **St Paul's Cathedral (Grade I):**

Significance and Contribution of Setting:

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

447. 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.

448. 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.

449. 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

450. 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.

451. These include old and newer high-level appreciations of the London skyline which allow the cathedral to be better understood as part of London's wider natural and cultural topography, including from the monument and higher level public viewing gallery such as the Sky Garden at 20 Fenchurch street, The Garden at 120 Fenchurch Street, One New Change, Horizon 22, and other emerging viewing terraces in the City Cluster. These make significant to moderate contributions to significance and an appreciation of it.

452. 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:

453. The GLA have identified a very low level of less than substantial harm to the Cathedral, through change within its setting. This is discussed below. The surveyor to the fabric of the Cathedral also requested confirmation of the visibility of the proposals along Fleet Street. The height and form of the proposals have been shaped with reference to the long-term strategic skyline curation of the City which, in turn, has been directly informed by St Paul's. The overall height and form of the designs, which has been reduced from the consented scheme, have been sculpted in order to preserve the skyline setting of St Paul's from the processional approach along Fleet Street in particular The proposed building has also been designed to assist in the long-term consolidation and singular coherence of the City Cluster, where this is visible in strategic riparian views, assisting and subduing the isolated bulk of 20 Fenchurch Street. Assisting the consolidation of the City Cluster would in turn soften the backdrop impact on the Cathedral. At no point would the Cathedral's pre-eminent location of the wider skyline, in broad panoramas or close up views, be prejudiced by the proposal. The enormous significance of the Cathedral would be preserved by the proposal, in view of both the baseline and cumulative scenarios.

454. The HTVIA has exhaustively tested views where the proposals will have an impact upon the setting of the Cathedral, including relevant LVMF viewpoints. In all cases the proposal has been designed to be either occluded by the cathedral dome, or where visible, seen to form part of the established cluster of tall buildings, and read a distant feature on the City's skyline. The view from Fleet Street as provided in the HTVIA therefore reflects a worst case scenario. The impact of the proposals on the significance of the listed building is therefore considered to be neutral, preserving the contribution of setting, as per the consented scheme.

No 37 & 39 Lime Street (Grade II):

Significance and contribution of Setting:

455. 37-39 Lime Street hold modest architectural and historic significance, comprising a 1920s office building constructed in a neo-classical style. Designed by Leo Sylvester Sullivan, the building is of Portland stone, and features decorative details of note including a pedimented doorway with mounted acroteria and acanthus stone leaves, Tuscan piers as well as brown metal aprons to the fenestration.

456. Group value is created with the adjacent buildings to the eastern side of the street with the consistency of scale and tight curve of the road enhancing the sense of an enclosed historic streetscape within the immediate vicinity. The wider surroundings include views of tall buildings, including 20 Fenchurch Street seen prominently to the south, and the Lloyd's Building seen to the west. Views of the eastern entrance into the market are glimpsed along Leadenhall Place. The rear elevation of the site is just seen behind the Lloyds building, rising over the market. These views appear incidental and utilitarian, creating 'back of house' character which detract from the views towards the market. The overall contribution of setting to the significance of the listed building is considered therefore to be mixed, both positive and neutral.

Impact:

457. The GLA considers that the proposal would result in less than substantial harm, of a very low level.

458. While it is acknowledged the visible extent of the site would increase as a result of the proposals, this is consistent with the wider character of the listed building's setting, which presently takes in a number of tall buildings, as well as the consented scheme. Therefore, officers disagree with the conclusions of the GLA, finding that the setting is not adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed from both the existing and cumulative scenarios and the consented scheme.

7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):

Significance and Contribution of Setting:

459. Nos. 7 and 9 Bishopsgate and The Royal Bank of Scotland are notable for their striking facades. 7&9 Bishopsgate possesses a polychromatic character, created through the use of stone and pink marble whereas the Royal Bank of Scotland uses a double height ionic colonnaded arcade to the main frontage with foliate swags above. Both are nineteenth century in date and hold high architectural and historic interest, contributing to their overall significance.

460. The setting of the buildings is varied, comprising the sombre Portland stone buildings to the western side of Bishopsgate and Gracechurch Street. These are of a similar scale and decorative quality. In contrast the tall buildings to the eastern side of Gracechurch

Street, including 22 and 10 Bishopsgate possess a robust contemporary character and relatively monumental height, creating distinct duality within the surroundings.

Impact:

461. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting. The site is visible in views that take in the listed buildings from the junction with Threadneedle Street and along Bishopsgate, seen in the middle distance. These views include the front façade of the site as well as the stepped additions to the roof, seen to add a considerable mass of structure above the roof line. The proposals would be visible in these views (View 1 within the HTVIA) but appreciated as a continuation of the tall buildings to the east, preserving the existing sense of duality within the setting. Officers therefore disagree with the GLA finding there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as a result of the proposed development within both baseline and cumulative scenarios, as per the consented scheme.

2a Eastcheap (Grade II):

Significance and Contribution of Setting:

462. Built in 1910-11 by Frank Sherrin, the building retains high architectural and historic interest through its characteristic early twentieth century appearance, including retained ground floor shopfronts. Decorative features include crouching Atlantes on Ionic pilasters, supporting semi-circular pediment above and octagonal turret with ogee lead roof and weathervane.

463. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings several of which are evidently modern in character. The building is seen together with the Monument, seen in views down Fish Hill, making a positive contribution to the setting. The overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the city cluster are seen to the north, further cementing a modern architectural character to the surroundings.

464. The site is seen obliquely within the middle distance of views north. It makes a neutral contribution to the setting and significance of the listed building, with the main façade seen forming a cohesive and group with the neighbouring Portland stone buildings to either side, and the towering form of 122 Leadenhall above.

Impact:

465. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting. The proposals would be appreciated in open northward views along Gracechurch Street, however this would be viewed in the context of the existing office developments in the immediate setting and tall buildings of the City Cluster in the background. The reinstated façade of the existing building ensures the existing proportions and material character of the sites lower floors continue to be appreciated. As such the proposals are considered to be consistent with the existing character of the setting. Therefore, officers disagree with the GLA, finding no harm would be caused to the special interest and significance of the building within both baseline and cumulative scenarios through alteration within its setting, as per the consented.

7-8 Philpot Lane (Grade II*) and 23 and 25 Eastcheap (Grade II):

Significance and Contribution of Setting:

466. 7-8 Philpot Lane reflects a much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic, and archaeological significance, less so artistic. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards. 23 and 25 Eastcheap showcase the opulence and eclectic style of high Victorian architecture. built in 1861-62 by John Young and Son, the buildings feature a Lombardic Gothic design with polychromatic brickwork, terracotta detailing on round-headed windows, twisted columns, and carved animals adorning the façade. The building has architectural interest as a mid-19th century commercial building, in an Italianate style as well as historic interest as a representation of the rapid growth in purpose built, larger scale commercial premises in the City during the 19th century.

Impact:

467. The GLA considers that the proposal would result in less than substantial harm, at a very low level, through change in the settings of these listed buildings. The proposal would be appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane. These dramatic contrasts in scale between the old and new are an established character trait of this setting which, otherwise, in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed buildings would continue to dominate. Officers therefore disagree with the GLA finding the proposal would preserve the special interest/significance, and the contribution made by setting to the significance of the listed buildings within both baseline and cumulative scenarios, as per the consented scheme.

St Mary Woolnoth (Grade I):

Significance and Contribution of Setting:

468. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.

469. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, is set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. This makes a medium contribution to the significance of the Church.

Impact:

470. The GLA considers that the proposal would result in less than substantial harm, at a low to middle level, through change in the setting.The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. The foreground of Portland Stone classical buildings are presently backdropped by Cluster of tall buildings behind, creating a theatrical contrast in scale and character between the old and new City. The Church in part is backdropped by 20 Fenchurch Street and the proposal would form part of that wider backdrop, forming a kinetic and transient relationship. From the junction of Lombard Street and King William Street the Church would remain the pre-eminent foreground monument with a skyline presence. Given the

transient nature of the impact, officers disagree with the GLA and it is considered that the magnitude of impact would be minor and that no harm to the significance or setting of the church would arise within both baseline and cumulative scenarios, especially given the significant distance of the proposal to the east. The Church would still have a sky-backed skyline presence in important local views, and it would remain a prominent City landmark and skyline feature, as per the consented.

Bank Conservation Area:

471. The proposal would be visible from a number of vantage points within the Bank Conservation Area.

472. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic nexus of financial power and with its high historic associative interest. This is expressed through the sense of dramatic arrival at bank junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction.

473. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate/Gracechurch Streets, mitigated. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new. The character of Bank junction as a historical centre is therefore presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.

474. The site at present makes a neutral contribution to the setting of the conservation area, seen in north south views along the eastern boundary of the conservation area at Gracechurch Street. The decorative quality of the upper floors to the main façade is undermined by the loss of the original ground floor and indifferent, plain design of the extensions above parapet level.

Impact:

475. Historic England have identified harm to the Bank Conservation Area due to, what they perceive as, harm to St Michael-upon-Cornhill from "the prominence of the church tower and its filigree detailing becoming lost against the proposals", where they consider that the Church makes a significant positive contribution to the Bank Conservation Area. The GLA considers that the proposal would result in less than substantial harm, ranging between a low to middle level of harm, due to a change in backdrop to the conservation area and intervisibility. This is addressed below.

476. The proposal would be visible from Bishopsgate/Gracechurch and Threadneedle Streets, Bank Junction, as well as east along Cornhill. In those views, north and south along Bishopsgate/Gracechurch Street, the proposal would read as part of the cumulative Cluster of tall buildings, including emerging developments at 1 Leadenhall Street, 60 and 70 Gracechurch Street. Here, the proposals are considered to contribute a high-quality contemporary addition that, while of a differing scale, retains a positive dialogue with the scale and proportions of the Conservation Area opposite. This is achieved through the retention of the existing façade to Gracechurch Street and set back of floors immediately above the existing parapet. Therefore, the proposal would form part of that prevailing contrast in scale on the eastern border of the Conservation Area, whilst retaining those aspects of the site which currently make a positive contribution to its setting.

477. It is acknowledged that the upper floors of the proposals extend beyond the existing building line, and this would be appreciable, however as illustrated in views 6 and 7 when considered alongside consented schemes, the projecting quality of the proposals would be softened, seen to be sitting within a visual envelope already defined by contemporary architecture.

478. In views east from Bank Junction (view 31) the proposal would be visible in the backdrop, seen alongside the buildings of the city cluster including 1 Leadenhall Street. Comments received from Historic England have considered that the impact to views east along Cornhill (view 32) diminish the positive contribution of the tower of St Michael-upon-Cornhill and its associated contribution to the significance of the conservation area, creating a harmful impact to the conservation area. Specifically, this is in light of the proposals creating a fleetingly appreciable backdrop to the tower of St Michael Cornhill, at the junction of Cornhill where it meets the Royal Exchange Buildings. This interaction between old and new is not an unusual relationship in the Conservation Area, with views

of the City cluster frequently seen in dynamic contrast with the historical City in the foreground. The reduction in height of the proposals from the consented scheme would enable a greater appreciation of the spires of the tower of the Church and allow them a greater degree of retained dominance on the skyline in this view, with the current proposals not rising above the height of the tower of the Church in this view, as they had done previously. Nonetheless, there would still be a degree of harm from the fleeting backdropping of the proposals behind the tower in this specific view.

479. Fundamentally, the current appreciation of a tightknit historic streetscape within the conservation area would remain undiluted, the same as the consented scheme. Additionally, the proposals would preserve the majority of views towards St Michael Cornhill. Nevertheless, despite the reduction in height over the consented scheme, such is the contribution of the specific viewpoint identified above to the church's setting and significance, and in turn, its contribution to the conservation area, that the proposal is considered to cause a very slight, low level of less than substantial harm to the significance of the Conservation Area.

Chapel Royal of St Peter ad Vincula (Grade I):

Significance and contribution of setting:

480. Constructed in ragstone rubble and flint with worked stone dressings, the site of the chapel has been a place of worship since the 9th century, with the current iteration of the building dating to the sixteenth century. Its high architectural interest stems from its rarity value as a 16th century chapel with retained flint covered tower and 17th century wood bell cupola. Beyond the high archaeological interest in the church's fabric, including preserved Tudor liturgical furniture to the interior, the church holds exceptional associative historic value as the resting place of Anne Boleyn, Thomas More and Lady Jane Grey amongst others.

481. The setting of the chapel makes an exceptionally high positive contribution to the significance of the listed building. The historic associative and commemorative value noted above is amplified through proximity to the White Tower and the location within in the Inner Ward. This yard is intimately connected with an appreciation of the building's historic interest, comprising the dramatic staging of execution for many of those interred in the chapel. The chapel's placement within an otherwise military and fortified setting is also powerfully illustrative of the theocratic nature of Tudor London. More generally the immediate verdant setting of Tower Green also provides a pleasing open approach to

the chapel. Views from within the Inner Ward are enclosed by the surrounding walls, but more distantly to the south of the chapel these views take in the City Cluster, with tall buildings comprising an established part of the chapel's wider setting in the baseline, and especially in the cumulative scenario.

Impact:

482. As with the consented scheme Historic England have raised concerns over impacts to the setting of the church and views towards its tower from certain viewpoints within the Inner Ward, and officers have inferred HE has concluded level of less than substantial harm, although this is not explicitly stated. It is noted that similar, even greater, impacts in the cumulative scenario have not attracted concern from HE, including the consented (now implemented) 1 Leadenhall, 1 Undershaft or 22 Bishopsgate.

483. The proposed development will be visible from the Inner Ward seen as part of the backdrop of the City Cluster, between 20 Fenchurch Street, assisting in the consolidation of the City Cluster as a singular urban form. The proposals will be visible behind the Chapel bell tower, terminating below the tower parapet, but joining with its eastern flank and merging with its silhouette. The lantern bellcote of the Chapel would however be unaffected and remain seen against an open sky backdrop, with the proposals appearing lower against the church tower in comparison to the consented scheme. It is noted this view is transient and fleeting, with the proposals disappearing from sight as the chapel is approached and when the green to the south of the chapel is reached.

484. When considered in alongside the cumulative scenario, the proposals no longer constitute the loss of an unbroken silhouette, with consented proposals at 70 Gracechurch Street also appearing to the tower's left and reaching above its parapet.

485. The impact of change to this view is considered to be mitigated due to its fleeting quality and more general compliance with the wider and evolving tall building context. As such the proposal is considered to result in a neutral impact to the significance of the Chapel Royal of St Peter ad Vincula, preserving the existing contribution of setting described above.

486.

Non-Designated Heritage Assets

487. A scoping of the wider setting has been made to ascertain whether, in Officers view, the proposed development has the potential to affect the significance of any building/structure which is of itself of sufficient heritage significance to warrant consideration as a non-designated heritage asset. The following assets were identified as a result of that scoping exercise.

Nos. 1-4 Bull's Head Passage

Significance and Setting:

488. This modest early-mid nineteenth century range of shops, with office and ancillary accommodation above holds architectural interest by virtue of their characteristic late Georgian/early Victorian appearance. Constructed of stock brick with retained sash windows and a rounded corner to their eastern end, they are illustrative of the small-scale mixed use commercial development common to the City and wider capital prior to Victorian and later rebuilding. Additional historic associative value is established through connection to the Skinner's Company. The building therefore retains moderate historic and architectural interest and is considered a positive contributor to the surrounding Conservation Area sufficient to be considered a Non-Designated Heritage Asset.

489. The setting of the buildings comprises the very narrow lanes surrounding Leadenhall Market, establishing a sense of intimacy and enclosure and limiting the extent within immediate surroundings where the shop row is appreciable. The buildings hold group value with the market itself, forming part of a wider nineteenth century townscape overlayed onto a medieval street pattern. To the north and east, views into the entrance of the lane take in the tall buildings of the City Cluster, creating a backdrop to the immediate Victorian townscape of the lane itself. The overall contribution of the setting to the significance of the non-designated heritage asset is significant and moderate.

Impact:

490. The proposed alterations to the party wall would be minor and would present a clean, simple backdrop to the buildings. Full details of these interfaces are to be reserved via condition.

491. Despite its relative proximity, the site is not appreciable within the lane, due to the considerable sense of enclosure along the passage, only coming into view beyond the lane's eastern entrance, towards the junction of Lime Street and Lime Street Passage. These views take in the indifferent upper floor and rear façade of the existing structure, making an adverse contribution to the setting of the shop group beyond the passage.

While the proposals will introduce a change within this view, this is not inconsistent with the current character of the surroundings beyond the immediate setting of the lane interior. Views within the lane themselves, where the architectural quality of the buildings are best appreciated, are considered to be preserved due to the narrow field of view created by the lane width. The impact upon the contribution of setting and significance of 1-4 Bulls Head Passage is therefore considered to be neutral and it would be unharmed within both baseline and cumulative scenarios.

85 Gracechurch Street, Principle of Redevelopment

492. The existing, unlisted building on the site was completed in 1935 as an office building to designs by E. Howard and Partners. The façade to Gracechurch Street possesses a degree of architectural interest, recognised by the building's inclusion in the Leadenhall Market Conservation Area; its status as a Conservation Area building has been assessed in detail. Otherwise, the building has been considered against the relevant criteria in Historic England Advice Note 7 as a potential non-designated heritage asset. It is considered that the building's elevations are unexceptional and are not considered to possess sufficient architectural interest; moreover, the building is not considered to hold any associations with events, individuals or organisations of historic interest. It is not of an age, landmark status or rarity above the norm; it does not possess standout group value. As such, it is not considered to be a non-designated heritage asset in its own right.

493. As such, the proposed demolition of the existing building and reconstruction is considered acceptable, in principle.

Other Heritage Assets

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

495. The HTVIA includes a list of heritage assets which were scoped in and out. The designated heritage assets considered included:

- Custom House, Grade I
- Old Billingsgate, Grade I Church of St Clement, Grade I
- Merchant Taylors Hall, Grade II*
- Adelaide House, Grade II
- 2 Royal Exchange Buildings, Grade II
- 6 and 7 St Mary at Hill, Grade II
- 123 Old Broad Street, Grade II
- 66 and 67 Cornhill, Grade II
- Gateway to the yard of Church of St Peter, Grade II
- 48 Bishopsgate, Grade II
- 40 Threadneedle Street, Grade II
- 2-3 Philpot Lane Grade II,

496. amongst others, including all the various listed buildings which substantially comprise the Eastcheap, Guildhall, Finsbury Circus, St Helen's Place and Tower Conservation Area (London Borough of Lambeth).

497. It is the view of your officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets. Other assets have been scoped out of consideration for the reasons given in the HTVIA (your officers agree with that scoping exercise). Your officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the HTVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development.

Conclusion on Heritage

498. Overall, a low level of less than substantial harm has been found to the significance of the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I). Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved. Accounting for the unique site-specific circumstances and facts of

the case, the proposal in this instance (considered in its entirety) would preserve and result in a minor enhancement to the heritage significance of the Leadenhall Market Conservation Area.

499. The scheme is design-led and has accounted for strategic heritage considerations, having been designed to accentuate the unique characteristics and sprit of the place, whilst preserving strategic views from Fleet Street and the river. It has been found that the proposal would result in minor enhancement of a number of strategic views. The benefits and harms will be considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report. Overall, in view of the heritage harm identified the proposal would draw conflict with Local Plan Policies CS12 (1), CS14 (2), DM 12.1 (1), DM 12., draft City Plan 2040 policies S11 and HE1, and London Plan HC1. Special regard is paid to the desirability of preserving the listed buildings, their settings or any features of special architectural or historic interest which they possesses, under the duty set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2025 policies.

Transport

500. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

501. The existing site is a mixed-use building with retail at the ground floor and office use across upper storeys fronting Gracechurch Street and with rear access from Lime Street Passage. The existing consists of 7,671 sqm (GIA) of office space and 364 sqm (GIA) of retail space and has no off-street car parking, nor vehicle access for deliveries and servicing which currently takes place from the public highway.

502. In October 2023, a proposal for mixed used development, (ref: 22/01155/FULEIA) was approved for this site, predominantly an office use development and retail space, exhibition space and heritage garden. The proposal included provisional details of vehicle crossover on 85 Gracechurch Street to allow vehicular access for deliveries and servicing overnight. The consented development included a public hall, through which a pedestrian link was created from Gracechurch Street to Lime Street passage.

503. This proposed development is for demolition of existing building and construction of a mixed use development, 29 storeys building, with ground floor with two basements

levels. The land uses of this development are: office space (Use Class E), café/retail space (Use Class E), and cultural / exhibition space (Sui Generis Use Class).

504. The proposed ground floor is publicly accessible hall and it includes the retail unit. The office use is on the upper floors with a lobby and office entrance from Gracechurch Street. The dedicated exhibition space is located at the basement level one, whereas the viewing gallery is provided at level 5. The exhibition space is created following the archaeological discovery of a section of the first roman London basilica. Table 1.1 shows the existing and the proposed GEA.

Land Use	Existing (GIA) sqm	Consented (GEA) sqm	Proposed (GEA) sqm
Office (Class E(g)(i))	**7,671**	**37,098**	**36,450**
Retail (Class E)	**364**	**620**	**360**
Sui Generis (Exhibition/Culture use)	**-**	**892**	**644**
Sui Generis (Public hall)	**-**	**946**	**624**
Total	**8,035**	**39,557**	**38,078**

505. Table 1.1 - Existing (GIA), Consented (GEA) and Proposed (GEA)

506. The development site is located within the Leadenhall Market area, bounded by Gracechurch Street to the west. Gracechurch Street is part of the Transport for London Road Network (TLRN) of which TfL is the highway authority. Access from the east is from Lime Street Passage, operating between Leadenhall Market to the north and Lime Street to the south and it provides connection with Fenchurch Street to the south. Lime Street

and Lime Street Passage are restricted for access to cars and motorcycles between the hours of 08:00-18:00 Monday-Friday.

507. Public Transport Accessibility Level (PTAL) for this development is 6b which is the highest PTAL level. This score was derived using TfL's WebCAT service.

508. The site benefits from excellent transport connections, with Bank Station at approximately 400 meters to the west facilitating connections to London Underground (LU) lines Waterloo & City, Central and Northern line. The site is also served by the Docklands Light Rail (DLR) services operating from this station. Monument LU station is a short walk away, approx. 300 m south of the site, facilitating connections to the District and Circle line. The area where this site is situated is highly pedestrianized, with surrounding streets forming part of key walking routes through the City.

509. The site is well-served by London Buses, with the nearest bus stop in Fenchurch Street located 160m from the site on Gracechurch Street, which serves buses on routes 21, 35, 43, 47, 141, 149, 344, 388.

510. Parking restrictions operate on the CoL's nearby streets on Monday to Friday, 7AM - 7PM, and Saturday, 7AM - 11AM (except Christmas Day, Good Friday or Bank Holiday). The current demand and occupancy levels for car parking spaces on the public streets was not surveyed.

Site Access

511. In order to facilitate activities associated with deliveries and servicing, including off-street waste and recycling collections, a vehicular access is proposed from Gracechurch Street. This access is restricted at specific times and days, allowing activities to take place from 23:00 till 07:00 on Tuesday, Wednesday, Thursday, Friday and Saturday evenings, and from 21:00 till 07:00 on Sunday and Monday, and it aligns with servicing strategy of the consented development.

512. The proposed changes to create vehicular access from the public highway—where TfL is the Highway Authority (HA), require separate approval. The submission for HA approval must be supported by a Road Safety Audit (RSA). The applicant must enter into a Section 278 agreement with TfL and agree to cover the full costs of implementing the required highway works. Access for the cargo bikes is located in a section of the public hall and is unrestricted.

513. A pedestrian through route is proposed from Gracechurch Street to Lime Street Passage on the newly created public hall.

514. Further details are required regarding the status of the pedestrian route created through the public hall, including whether it is permissive access only or subject to other arrangements, how access is secured, any restrictions on its use, who is responsible for managing and maintaining the space.

515. The public hall is proposed as a flexible Sui Generis use to facilitates temporary market stalls, public events, or exhibition space for artworks or museum pieces.

516. The public hall provides direct access through lifts and stairs to the basement level 1 exhibition space, as well as two dedicated cycle lifts that provide access to the fourth floor for short and long-stay cycle parking, and third-floor end for trip facilities.

517. This application is supported with Transport Assessment (TA) that includes the Active Travel Zone (ATZ) assessment. The TA states that this assessment was carried out in line with TfL Transport Assessment guidance to support Vision Zero and the Healthy Streets approach.

518. In August 2020, TfL introduced several changes along Bishopsgate (A10) as part of the corridor improvement scheme aimed at enhancing safety for walking, cycling, and public transport use, in line with Vision Zero. The scheme included new vehicle restrictions on weekdays between 07:00 and 19:00, wider footways, and a few banned turns. Additional interventions to improve safety are currently being explored by TfL.

Trip Generation (All modes)

519. The trip generation methodology was based on the TRICS database and comparable sites, with adjustments to mode shares informed by the 2011 Census 'Method of Travel to Work' data and the relevant MSOA layer. These adjustments reflect local characteristics, including the high provision of public transport and the fact that this is a car-free development. The office and exhibition/cultural uses were assessed as the primary contributors to trip generation, while retail trips were excluded on the basis that they are secondary trips, such as those made by passers-by or as part of linked journeys.

520. The net change in trips generated from existing to proposed, during AM and PM peaks for all travel modes, is shown on the table below (extract from the submitted TA Table 5-13).

Mode	AM Peak			PM Peak		
	In	Out	2-Way	In	Out	2-Way
Underground	+186	+16	+202	+18	+204	+222
Train	+270	+23	+293	+26	+296	+322
Bus	+37	+3	+40	+4	+41	+45
Taxi	+3	0	+3	+1	+3	+4
Motorcycle	0	0	0	0	0	0
Car Driver	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0
Bicycle	+22	+2	+24	+2	+24	+26
Walk	+30	+3	+33	+6	+35	+40
Total	**+547**	**+47**	**+595**	**+57**	**+603**	**+659**

521. Table 1.2. - Net change in Trip generation (existing- proposed)

522. This development is predicted to generate a total of 595 (All modes) two-way trips during the AM peak and 659 during the PM peak, with significant increases in public transport trips (534 additional during AM peak and 589 additional during PM peak).

523. When comparing the consented development with this proposal, there is a slight decrease in the overall number of trips generated. Table 1.3 illustrates the changes.

Mode	AM Peak			PM Peak		
	In	Out	2-Way	In	Out	2-Way
Underground	-3	0	-4	-1	-4	-5
Train	-4	0	-4	-1	-5	-6
Bus	-1	0	-1	0	-1	-2
Taxi	0	0	0	0	0	0
Motorcycle	0	0	0	0	0	0
Car Driver	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0
Bicycle	0	0	0	0	0	0
Walk	-2	0	-2	-1	-3	-4
Total	**-11**	**-1**	**-12**	**-4**	**-13**	**-17**

524. Table 1.3 - Consented development vs the proposal

Trip Generation for Deliveries and Servicing

525. The CoL's Transport Strategy and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, state that:

526. The City's transport infrastructure will be maintained and improved by minimizing road danger, congestion, and reducing vehicle emissions by:

- Designing and managing streets in accordance with the City of London Street hierarchy;

- Minimizing the impact of freight and servicing trips through measures such as the provision of on-site servicing facilities, timing deliveries outside peak hours, adopting area-wide solutions, freight consolidation, and promoting deliveries by foot or bicycle;

- Facilitating essential traffic, including emergency service vehicles, buses, freight, and private transport for people with particular access needs, while minimizing the environmental impact of these modes;

- Requiring the provision of infrastructure for alternative-fuel vehicles and zero-emissions vehicles, such as off-street vehicle charging points.

527. In addition, Part H of this Policy states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans, and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimized as a result of their development. This includes promoting best practices such as direct vision standards and zero-vision policies to minimize the danger of travel and servicing, including through the use of river transport. This aligns with the adopted policies of the Local Plan 2015, Strategic Policy CS16.

528. In line with applications approved by the City of London (CoL), trip generation for servicing and delivery activities is based on the assumption that 0.22 deliveries are required per 100 sqm for Class E (office use), while the rate for retail use is calculated at 1.35 deliveries per 100 sqm.

529. Applying this methodology to the proposal—with 36,450 sqm GIA of office space—an estimated 80 trips per day are generated. For the 360 sqm (GIA) of retail/commercial use, approximately 5 trips per day are expected. This results in a total of 85 trips per day, covering the main land uses of the development.

530. If 50% consolidation is applied, two way trips are 43 trips per day, covering all activities associated with delivery and servicing. Taking into account that each delivery requires two trips, (one IN and one OUT movement), the expected number of deliveries/servicing (includes refuse and recycling) is 22 within the 24h period.

531. Table 1.4 below shows the modal split for office and retail covering scenarios with and without consolidation.

Mode	% Modal split (office)	Trips No consolidation	Trips With 50% consolidation*	% Modal split (retail)	Trips No consolidation	Trips With 50% consolidation*	Deliveries Total development*
Motorcycle /scooter	4	3	1.5	0	0	0	**1**
Car	34	27	13.5	25	1	0.5	**7**
LGV	53	42	21	25	1	0.5	**11**
Rigid 3 axle (HGV)	9	7	3.5	50	3	1.5	**3**
Rigid 4 axle (HGV)	0	0	0	0	0	0	**0**
Total	100	**80**	**40**	100	**5**	**3**	**22**

*some of the numbers in the columns are adjusted to make even numbers

532. Table 1.4 - Trips generated and mode split (with and without consolidation)

533. Therefore, number of deliveries/servicing is capped at 22 per day with the transport mode split as shown on the table 1.4 , secured though the s106 Delivery and Servicing Management Plan (DSMP). Deliveries by cargo bikes are permitted at all times in the area dedicated on the public hall, managed by the facilities management.

534. There are agreed restrictions on timings for deliveries and servicing of this development, allowed only between the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings and 21:00-07:00 on Sunday and Monday evenings.

535. In addition, a booking system is required to manage and allocate delivery/servicing slots for all land uses of this development, secured via S.106. This ensures that safety on the public highways is not compromised during pedestrian peak times and that no queuing happens in and around this development. The booking system must keep records of trips generated following the first occupation and records presented to the CoL upon request to ensure compliance.

536. Refuse/recycling collections are recommended to be part of the same booking system that manages the delivery and servicing slots to ensure no conflicts and in order to comply with the restrictions on days/ hours for vehicular access to this development. Allocated slots for refuse/recycling can be reeak in the ed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development. This ensures that loading/parking area is managed within the allocated times and that it facilitates different requirements.

537. All terms above to be secured though s106 obligation, requiring the submission and agreement of a Delivery and Servicing Management Plan (DSMP).

Pedestrian Comfort Levels

538. The Pedestrian Comfort Level (PCL) assessment was provided to determine the existing and proposed levels in the vicinity of this development. TfL guidance 'Pedestrian Comfort Level Guidance v2' (2019) has PCL levels that range from A to E to represent differing levels of suitability on different areas of pedestrian movements and are categorised as: comfortable, acceptable, at risk and unacceptable /uncomfortable. For the areas (office and retail development) where the PCL level is C, this is considered at risk, whereas PCL below level C are unacceptable and require highways improvements and widening of the footways or crossings.

539. The detailed PCL Assessment was undertaken for the consented development, while using pedestrian survey data at different locations along Gracechurch Street, as shown on the figure below.

540. It assessed the 'existing' and 'do nothing' options alongside the proposed development, including two 'do something' options related to the proposed development. The PCL Assessment indicated that, under a 'do nothing' scenario, future pedestrian footfall associated with the consented development would result in a comfort level of C- at the narrowest section of Gracechurch Street adjacent to the site.



Table 6.1: Existing Site 2025 - Gracechurch Street PM Peak			
Location	**Clear Width (m)**	**2025 Flow**	**PCL Rating**
1 - Gracechurch Street	2.20	2,476	C+
2 - Gracechurch Street	2.25	2,476	C+
3 - Gracechurch Street	2.40	2,476	B-
4 – Gracechurch Street	2.25	2,476	C+
5 - Gracechurch Street	2.90	2,476	B

Table 6.2: Proposed Development 2029 - Gracechurch Street PM Peak			
Location	**Clear Width (m)**	**2029 Flow**	**PCL Rating**
1 - Gracechurch Street	2.20	3,166	C-
2 - Gracechurch Street	4.60	3,166	B+
3 - Gracechurch Street	5.10	3,166	B+
4 – Gracechurch Street	5.20	3,166	B+
5 - Gracechurch Street	5.30	3,166	B+

541. (Extract from the TA, Tables 6.1 and 6.2, show the PCL's at different locations during the PM peak)

542. Table 6.1 shows the PCLs in the existing scenario with C+ levels at three of the points that were assessed along the Gracechurch Street.

543. Table 6.2 shows the PCLs with footway widening taken into consideration. The footway widening improvements along Gracechurch Street, secured through the Section 278 agreement, would accommodate the increase in pedestrian flows and improve pedestrian comfort levels—except at the southern entrance to Leadenhall Market (Location 1), where footway widening may not be possible due to site constraints.

Cycle Parking

544. Policy DM 16.3 of the Local Plan, requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible.

545. The London Plan, Policy T5 Cycling indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle, through:

- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.

- securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.

546. The level of the cycle parking provision is dependent on the location of the proposed development. City of London (CoL) is within the area where higher minimum cycle parking standards apply.

547. To comply with policy standards this proposal is required to provide a minimum of 499 long-stay cycle parking spaces and 47 short-stay cycle parking. The policy also requires that short-stay cycle parking must be available for customers and visitors at convenient and readily accessible space, have step-free access and located within 15 metres of the main entrance wherever possible.

548. The policy also requires 5% of the minimum number of long-stay parking spaces to be accessible.

549. Table 1.5 below, shows the standard requirements to comply with the London Plan.

Use Class	Floor Area sqm (GEA)	Long Stay	Short Stay
Former B1 business offices	36,450	1 space per 75 sqm (GEA) **486**	First 5ksqm=1 spaces per 500sqm; **10** thereafter 1 space per 5k sqm (GEA) **6**
Former A1 Food retail above 100sqm	360	1 space per 175 sqm (GEA) **2**	areas with higher cycle parking standards: 1 space per 20 sqm (GEA) **18**
Sui Generis (SG) (exhibition/culture and public hall)	1,268	1 space per 8 FTE staff (staff number unknown-**allowance of 11**)	1 space per 100 sqm (GEA) **13**
Total	**38,078**	**499**	**47**

550. Table 1.5 - Minimum Cycle Parking Standards and proposed provision.

551. This proposal includes a total of 399 (long stay) which is 20% less than the London Plan minimum requirements, and 43 (short stay) cycle parking spaces of the required 47 spaces.

552. The policy requirements for cycle parking supporting facilities are: changing rooms, maintenance facilities, lockers (at least 2 per 3 long-stay spaces are recommended) and shower facilities (at least one per 10 long-stay spaces recommended).

553. This proposal provides 24 showers which is less than the policy requirement of 50 showers, one DDA compliant shower, changing facilities and 2 lockers per 3 longstay cycle parking spaces.

554. The under-provision of long-stay and short-stay cycle parking—relative to the minimum London Plan standards—as well as the lower-than-recommended provision of some end-of-journey facilities and the placement of short-stay cycle parking on upper floors, is considered acceptable due to the unique circumstances of the site. These circumstances arise from archaeological findings in the basement and the allocation of space for displays that will benefit the public. This approach has been agreed upon with TfL.

555. Nevertheless, it is recommended that the applicant explores possibilities of placing 3 to 4 cycle parking spaces on each office floor space to deal with the shortfall of 100 long stay provision, and placing the short stay spaces for visitors at more convenient locations, as required by the London Plan and CoL adopted policies, through travel plan measures.

556. The proposed cycle parking by type is, as follows: 5% accessible Sheffield Stands, 85% two-tier cycle stands and 10% folding cycle lockers.

557. The entrances and lifts used by cyclists must be large enough to ensure that cyclists can be fully accommodated.

558. Further details are required on cycle parking and its facilities (locations, type and dimensions), secured through condition.

559. Further clarification is needed to understand the journey from entering the development to the areas designated for cycle parking. Additional information on how visitors can access these spaces, as well as the measures planned to encourage cycling as a mode of transport, would help provide a clearer picture of the user experience.

560. Nevertheless, these details should be addressed and included in Part 2 of the Travel Plan (TP), which will focus on promoting cycle parking and associated facilities. The TP Cycle Promotion Plan should outline initiatives in the form of an action plan with SMART targets. Targets for cycle parking are to be agreed upon with the City of London (CoL)

and are expected to be achieved within five years. The applicant is required to submit an annual report for review as part of the TP, which is secured via the Section 106 agreement.

Car parking

561. London Plan Policy T6 sets out car parking standards and provides strategic direction to ensure new developments include appropriate levels of parking. In accordance with Policy T6.5, disabled persons' parking for Blue Badge holders must be provided for non-residential elements of the development. The policy requires that all non-residential parts of a development provide access to at least one disabled parking bay, either on- or off-street, as outlined in Table 10.6. While car-free developments are not required to provide standard parking, they must still include provision for disabled users.

562. City of London (CoL) Policy DM16.5 states that developments in the City should be car-free, except for designated Blue Badge spaces.

563. Policy VT3 of the emerging CoL Local Plan reinforces this, stating that developments should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided, it must not exceed London Plan standards.

564. This proposal is a car-free development and does not include any disabled car parking. As such, it does not meet the policy requirement for disabled parking provision.

565. A Travel Plan (TP) is required to provide alternative arrangements for disabled staff and visitors to access the site and to mitigate increased demand for disabled parking on public streets. These measures must be secured through a Section 106 (s106) Agreement.

566. The primary objective of the TP should be to support disabled people—both staff and visitors—to ensure the development is inclusive. Disabled staff should receive a tailored travel plan upon joining any of the occupiers of the development, along with support initiatives to assist with commuting.

567. Similarly, disabled visitors should be able to request assistance for accessing the site, particularly where public transport does not meet their needs. Not all nearby Underground stations offer step-free access, meaning some users may require additional support. Measures such as arranging pick-up from nearby step-free stations or pre-arranged accessible locations should be considered and included in the TP.

568. The distance from proposed drop-off points and local transport nodes exceeds the recommended 50 metres. Therefore, opportunities for rest and recovery should be identified at intervals of no more than 50 metres between Blue Badge parking bays, drop-off points, and transport nodes. A request will be made that the feasibility of providing this be included in the scope of works agreed between the applicant and TfL within the s278 agreement between these parties.

569. The applicant must maintain records and provide alternatives to mitigate the impact of increased demand for disabled parking. Details of these alternatives for all land uses within the development must be included in the TP. An action plan with specific initiatives should be submitted annually to the Local Planning Authority (LPA) for review.

Deliveries/Servicing/Refuse /Recycling Strategy

570. 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. For proposals near residential areas, further restrictions are applicable, for example during evenings and early morning hours.

571. The existing deliveries and servicing arrangements are currently carried out on-street, utilising the loading bay on the Gracechurch Street.

572. The servicing strategy is proposing that deliveries and servicing takes place within dedicated area on the public hall, between the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday, Friday and Saturday evenings and 21:00-07:00 on Sunday and Monday evenings. The days and timings are as per the consented scheme, therefore acceptable. Deliveries by cargo bikes are not restricted at any time.

573. Swept path analysis is showing movements for 7.5t vehicles associated with delivery/servicing/ refuse/recycling, included on the TA, appendix B. There is capacity for two vehicles to carry deliveries/servicing at times, however activities in this area must be manged to ensure that safety procedures are in place in a coordinated and controlled manner. Facilities management is likely to be appointed in a role for managing deliveries and servicing and arrange booking slots.

Stopping Up/Oversail and Undersail

574. This proposal does not include the stopping up of public highways, or any oversailing or undersailing that would affect public highways.

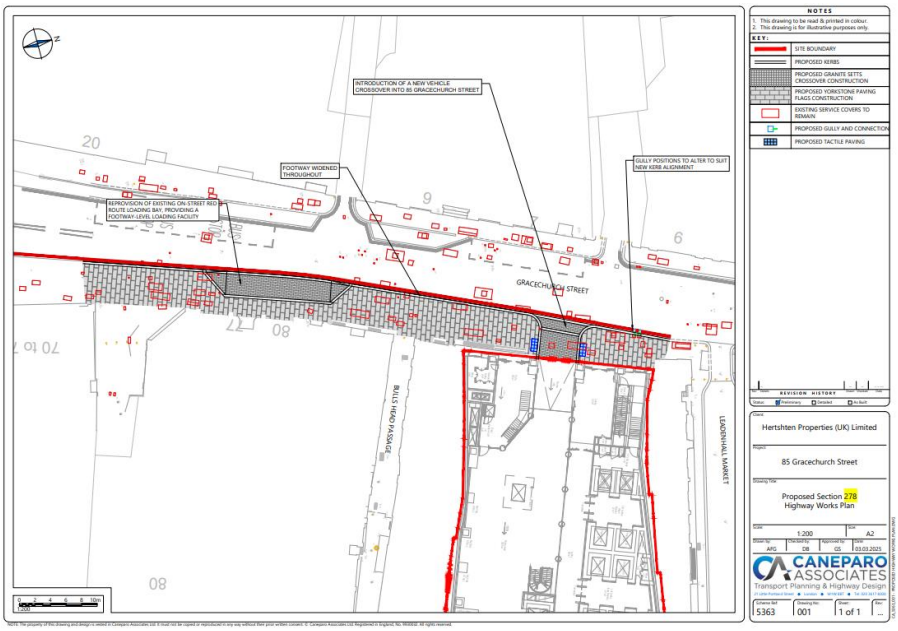
Highways Works - Section 278 Agreement

575. This proposal includes alterations to the public highway to facilitate vehicular access, which in turn necessitates additional changes along Gracechurch Street.

576. The footways along Gracechurch Street were previously widened in response to COVID-19 measures, using temporary surfacing materials and bollards. Transport for London (TfL) has confirmed that these changes are to be made permanent and is seeking to secure these works via a Section 106/Section 278 Agreements.

577. The proposed changes to this section of the public highway require approval from TfL. The highway scheme, which is similar to the one previously accepted in principle by TfL for the consented proposal, must be designed in accordance with the Healthy Streets principles and secured through a s278/s106 agreement. The applicant is required to cover the full cost of designing and implementing the highway works.

578. The figure 3.7 below, extract from TA, the plan shows the proposed s278 works.



579. An important consideration for the highway scheme should be improving accessibility and removing barriers for disabled people traveling to and from the development. For

example, this could include a review of rest points at 50-metre intervals from key public transport arrival points.

Demolition/Construction Logistics Plan (CLP)

580. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.

581. Policy D16.1 of the Local Plan supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1 state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.

582. Although an outline document was submitted, CLP- detailed plan to be developed in accordance with TfL guidance and the latest standards once a Principal Contractor has been appointed. The submitted document must comply with measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines. The detailed plan to show how construction vehicles will be managed during the demolition and construction phase, and in line with the principles of three Rs, that is, Reduce, Re-time and Re-mode.

583. The detailed CLP to be submitted to approved by CoL and TFL prior to the start of the demolition/ construction of this proposal.

Conclusion of Highways and Transportation

584. The proposal benefits from high levels of public transport accessibility, is car-free and promotes cycling and walking as sustainable modes of transport.

585. Non provision of disabled parking bays is the same as the proposal with granted consent by the CoL in 2023. The use of the ground floor is intrinsically linked to the public benefit of improving pedestrian permeability and accessibility in this area, and it allows the public hall to be used during the day as a market or facilitates other functions.

586. Lower provision for cycle parking and its facilities is a direct consequence of findings of the archaeological remains of first roman London basilica, following the excavations to implement the consented proposal, which then lead to revising of the approved scheme.

587. This proposal is considered acceptable in transport terms, provided that the applicant enters into the S106/s278 agreement and complies with planning conditions, as listed below.

- Planning condition requiring the provision of cycle parking spaces designed to London Cycle Design Standards and including end of trip facilities, with details to be submitted to and approved by the LPA
- Planning condition to secure the detailed demolition and 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.
- S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) with details on restrictions as referenced in this report. 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.
- S106 obligation to secure a Travel Plan (TP) for the development. The TP shall be approved prior to the occupation of the site and monitored for at least 5 years and until the SMART targets are met.

588. 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. And it also accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2 and emerging policies of the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3.

Wind Microclimate

589. 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.

590. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

591. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists. The City of London Lawson criteria define the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe. The threshold would be breached if wind speeds exceed 15m/s for more than 1.9 hours of the year (0.022% of the time).

592. 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 offsite 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.

593. There are four criteria for determining the sensitivity of a receptor:

- High: seating areas, entrances, and terraces
- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian access

594. There are also four criteria for determining the magnitude of change/impact to a receptor:

- Large: Safety exceedance
- Medium: two categories above criteria
- Small: one category above criteria
- Negligible: within suitable criteria.

595. Assessments have been carried out for both the windiest season and the summer seasons, and this is covered in Chapter 11 of the Environmental Impact Statement, Wind Microclimate.

596. Eight configuration scenarios were tested in the wind tunnel tests. These configurations are a series of cumulative configurations, which separates out all consented developments, and those which have been submitted but not yet granted planning permission (referred to as “non consented cumulative schemes”). These configurations are listed below:

Configuration 1: The existing site with the existing surrounding buildings;

Configuration 2: Proposed Development with the existing surrounding buildings;

Configuration 3: Proposed Development with proposed landscaping and existing surrounding buildings;

Configuration 4: Proposed Development with proposed landscaping, wind mitigation measures and existing surrounding buildings;

Configuration 5: The existing site with consented cumulative surrounding buildings (future baseline);

Configuration 6: Proposed Development with the consented cumulative surrounding buildings;

Configuration 7: Proposed Development with proposed landscaping, wind mitigation measures and consented cumulative surrounding buildings; and

Configuration 8: Proposed Development with consented cumulative surrounding buildings and 70 Gracechurch Street scheme (non-consented at the time of assessment).

597. The following consented cumulative schemes were identified within the 400m radius of the site and assessed in the wind tunnel model (Configurations 5-7) are as follows:

- 75 London Wall (Planning Application Reference: 23/01270/FULMAJ);
- 55 Broadgate (Planning Application Reference: 23/00469/FULEIA);
- 99 Bishopsgate (Planning Application Reference: 24/00836/FULEIA);
- 55 Bishopsgate (Planning Application Reference: 22/0098/FULEIA);
- 1 Undershaft (Planning Application Reference: 23/01423/FULEIA);
- 100 Leadenhall Street (Planning Application Reference: 22/00790/FULEIA);
- 70 Gracechurch Street (Planning Application Reference: 20/00816/FULEIA);
- 150-152 Fenchurch Street (Planning Application Reference: 23/01016/FULL);
- 60 Gracechurch (Planning Application Reference: 24/00743/FULEIA); and
- 47-50 Mark Lane (Planning Application Reference: 22/01245/FULMAJ).

598. The newest 70 Gracechurch scheme (Planning Application Reference: 24/00825/FULEIA) was not consented at the time of assessment and so was included in the assessment of Configuration 8.

599. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance, this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Wind Conditions at Street Level

600. In the existing baseline conditions (configuration 1) the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional sitting or standing. Most of the spill-out seating amenity spaces along Leadenhall Market

and Lime Street Passage have wind conditions suitable for frequent sitting use during the summer season. These conditions are suitable for the intended use. Occasional sitting conditions on Lime Street Passage and the seating provisions along the passage to the west of Lloyd's of London are one category windier than suitable for spill-out seating use. Leadenhall Market and Lime Street Passage have been assessed with the inclusion of existing non-porous screens to simulate demarked spill out seating locations, replicating the existing condition where licencing requirement dictate the use of such screens. These screens do serve to improve the baseline condition – when winds do blow through those spaces, they would be providing localised shelter to those areas where they are present.

601. The testing undertaken when assessing the completed development as part of the 2023 proposal (ref: 22/01155/FULEIA), found that in most locations the wind conditions would remain either in the same categories as existing or become windier by one category but would continue to fall within a category suitable for the intended use. Additionally, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.

602. The effects of the proposed development with existing surrounding buildings (Configuration 2) on wind conditions would range from suitable for frequent sitting to walking use during the windiest season to suitable for frequent sitting to standing use during the summer season. During the summer season, the wind conditions would generally be one category calmer, suitable for frequent sitting use to walking use. There would be no instances of strong winds exceeding the safety threshold at any probe location at the proposed development and the nearby surrounding area. There would be an instance of strong winds exceeding the 15m/s threshold in Leadenhall Street to the north; however, these exceedances are not considered significant as they were also recorded for the baseline.

603. Testing of the effects of the proposed development, against the current baseline, on wind microclimate has shown one area of the proposed development which would require wind mitigation measures to improve wind conditions to be suitable for the intended occupant uses. This is the spill out seating spaces with occasional sitting within Leadenhall Passageway (measurement location 63). Configuration 4 shows the proposed development with proposed landscaping, wind mitigation measures and

existing surrounding buildings. The area identified would be one category windier than suitable for spill out seating use.

604. It is proposed that incorporating 2 metre high partition screens within Leadenhall Passageway would mitigate this impact and result in the spill out seating having wind conditions suitable for frequent sitting use, representing a Negligible effect.

Cumulative Effects Assessment

605. Wind conditions for Configuration 5 (the future baseline scenario) show the wind conditions during the windiest and summer season respectively in relation to the consented cumulative surrounding schemes within the 400m radius of the site.

606. In the future baseline scenario, wind conditions would range from suitable for frequent sitting use to walking use. During the summer season, wind conditions would be one category calmer at ground level compared to the windiest season, suitable for frequent sitting use to standing use. Most spill-out seating areas in the vicinity of the site are suitable for the intended use during the summer season, however, the spill-out seating on Lime Street Passage and along the passage to the west of Lloyd's of London would still experience occasional conditions that are one category windier than suitable for spill-out seating use.

607. In terms of pedestrian comfort for Configuration 5, wind conditions at and surrounding the site in the context of the cumulative surrounding buildings would be the same or one category windier than those in the baseline scenario (Configuration 1) during the windiest season. During the summer season, wind conditions would be the same or one category calmer than those in the baseline scenario.

608. Wind conditions for Configuration 6 (Proposed Development with Consented Cumulative Surrounding Buildings) would be suitable for frequent sitting to walking use during the windiest season, with generally calmer conditions in summer. The inclusion of surrounding cumulative schemes would improve shelter across the site, particularly to Lime Street Passage. All key areas, including entrances, thoroughfares, and terraces, would remain suitable for their intended use, with no significant adverse effects identified.

609. Configuration 7 introduces proposed landscaping and wind mitigation measures and shows broadly similar wind conditions to Configuration 6, with most areas remaining in the same or calmer comfort categories. The landscaping measures are not expected to alter wind conditions across the majority of the site. However, some localised differences

are present between the two configurations. A small number of on-site and off-site thoroughfares and entrances would be one category windier or calmer than in Configuration 6, though all would remain suitable for their intended use. The key exception is spill-out seating at measurement location 258, which would continue to experience windier-than-desired conditions during the summer season and represent a Major Adverse (Significant) effect. This area remains flexible in terms of seating layout, and mitigation, such as café screens, would be expected to address the issue effectively.

Mitigation

610. As identified in Configurations 3, 6 and 7, one area of the Proposed Development would require wind mitigation measures to improve wind conditions to be suitable for the intended occupant uses: the spill out seating spaces with occasional sitting (measurement location 63) conditions would be windier than suitable for this use.

611. The area identified above with windier conditions would be one category windier than suitable for spill-out seating use. However, as noted earlier in this ES chapter, only the known spill out seating areas have been assessed in this assessment. The seating within Lime Street Passage and the quantity and position of these seating spaces are variable. As such, most of the areas identified with occasional sitting use conditions would only be one category windier than suitable for frequent sitting use. These areas would be suitable for thoroughfare use, which represents the common use of this space throughout the year. However, with the retention of the existing 1m high screens used to demark spill-out seating for future seating spaces and the introduction of 2m high screens to demark seating at location 63, these areas would be expected have wind conditions suitable for the intended spill-out use during the summer season.

612. The newest 70 Gracechurch scheme (Planning Application Reference: 24/00825/FULEIA) was not consented at the time of assessment and so has only been included in Configuration 8. Configuration 8 (Proposed Development with Consented Cumulative Surrounding Buildings and the 70 Gracechurch Street scheme) shows wind conditions broadly consistent with the earlier configurations, remaining suitable for walking use or calmer throughout the year. No strong winds exceeding safety thresholds were identified, and most areas would continue to experience conditions appropriate for their intended use.

613. The addition of the 70 Gracechurch scheme does not materially alter the wind environment, though spill-out seating areas at locations 63, 93, and 258 remain one

category windier than desired for occasional sitting use, consistent with Configurations 6 and 7. These areas would require mitigation. Other locations, including 60 and 61, would experience calmer conditions than in Configuration 5, representing a Moderate Beneficial (not significant) effect.

Wind Microclimate Conclusion

614. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level.

615. Where there have been off-site exceedances identified (locations 63 and 258) which would have windier than suitable conditions in the context of the existing surrounding buildings which are windier than the baseline scenario, these would be alleviated with the inclusion of mitigation measures.

616. 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.

617. 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.

618. 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.

619. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

Daylight, Sunlight and Overshadowing

620. 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.

621. 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.

622. 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.

623. 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.

624. 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

625. 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

626. 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

627. 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 applying the policies set out in policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

628. The application is supported by a Daylight, Sunlight and Overshadowing assessment, which forms part of the submitted Environmental Statement.

629. When referring to the degree of adverse impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact.

630. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the environmental statement In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE7) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

Daylight and Sunlight

631. The following sensitive receptors were identified with regards to daylight and sunlight:

- 7-12 Gracechurch Street
- 2-4 Bulls Head Passage
- St. Peter Upon Cornhill Church
- The Bunch of Grapes, 14 Lime Street
- Jamaica Buildings
- St Michael Cornhill Church
- 50 Cornhill

632. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC of the NSL guidelines are not met.

633. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

634. Each of the identified sensitive receptors is considered in this context below.

7-12 Gracechurch Street

635. This property is a commercial hotel to the west of the proposed site, and standing eight storeys in height. 128 windows were assessed, serving 98 rooms, along the eastern façade of the building and within its southern lightwell. Of these windows, 79 windows (or 61.7%) meet the BRE guidance for VSC and therefore would experience no effect or a negligible effect.

636. Concerning the other 49 windows, 13 would retain at least 15% VSC which is considered appropriate for a dense urban environment, and all 49 windows would serve bedrooms which are considered lesser expectors of daylight within the BRE guidelines.

637. The assessment for these windows and NSL concluded that 80 of the 98 rooms would meet the BRE's guidance, and therefore experience no effect or a negligible effect. Of the 18 remaining rooms, eight would retain at least 50% NSL which is considered to be a good retention of daylight distribution in dense urban environments such as this site. It also must be noted that the use is considered to be a commercial use, being a hotel, with the rooms themselves serving a transitory use. In this context, the daylight and sunlight impacts to this building are considered acceptable.

638. With regards to sunlight, 89 of the 98 rooms assessed (90.8%) would meet the BRE Guidelines for APSH and WPSH. Four of the remaining nine rooms would retain at least 20% APSH which is considered a good level in a dense urban environment, and all but one room would see no reduction in WPSH. As above, all rooms would serve as bedrooms and the property is commercial in nature with a transitory use of each room. In this context, the sunlight impacts of the proposal on this property are considered acceptable.

2-4 Bulls Head Passage

639. This site is in residential use, across four levels, and lies to the south of the site. Fives windows were assessed, with three of these windows meeting the BRE guidance. Of the remaining windows, one falls within a lightwell and experiences a low existing VSC of 1.2%, and the other window serves a room with other apertures. Turning to NSL, one of three rooms assessed would meet the BRE guidance. The other rooms would fall outside of the BRE guidance, with one experiencing a low NSL value in the existing circumstance (0.2%) and a 0.2% absolute reduction which would be unlikely to be perceptible, and the other room being a kitchen of c. 13m2. The latter room would not be considered a habitable room. This property would therefore experience a Minor Adverse impact which, in this context, is considered acceptable.

640. Regarding sunlight, the property achieves full adherence against BRE Guidelines compliant sunlight testing.

St. Peter Upon Cornhill Church

641. This church consists of two levels and is located on the western side of Gracechurch Street, north east of the subject site. Of the 20 windows assessed, 10 would meet the VSC standards of the BRE Guidelines. All 10 windows remaining serve the same space, and the room would face an average absolute VSC loss of 1.1%. All three rooms then meet the BRE Guidelines for NSL. As such, it is considered to experience a Minor Adverse impact.

The Bunch of Grapes, 14 Lime Street

642. This property meets the VSC and NSL recommendations of the BRE Guidelines, and full adherence to the sunlight tests.

Jamaica Buildings

643. This property meets the VSC and NSL recommendations of the BRE Guidelines. Sunlight testing shows five rooms of nine would meet the BRE recommendations as to APSH and WPSH. The four remaining rooms would see a minor adverse impact on APSH, and no reduction for WPSH. These rooms are also bedrooms and kitchens, with the BRE outlining at paragraph 3.2.3 of the Guidelines that “bedrooms are less important” and “normally loss of sunlight need not be analysed to kitchens and bedrooms”. As such, the impact of the proposed development on the sunlight of this property is considered acceptable.

St Michael Cornhill Church

644. This religious building is located to the north-west of the site. 55 of the 56 windows would meet the BRE Guidelines when assessed for VSC, and the room assessed would meet the BRE Guidelines with regards to NSL. This is considered a Minor Adverse impact. Turning to sunlight, the property fully adheres with the BRE Guidelines on sunlight testing.

50 Cornhill

645. This site is in residential use, and is located to the north west of the site. 94 of the 95 windows tested meet the BRE guidance for VSC, with all rooms satisfying the BRE recommendations for NSL. It is considered that this represents a Minor Adverse impact. For sunlight, 11 of the 12 rooms assessed would meet the APSH and WPSH

recommendations of the BRE Guidelines. The remaining room serves as a bedroom which, as set out above, is considered a lesser expector of sunlight and would not normally need to be analysed. In this context, the impacts are considered acceptable.

Cumulative Impact

646. A Tier 1 cumulative scenario has been assess and provided as a part of the Environmental Statement's technical information concerning light impacts. A Tier 2 cumulative scenario was not considered appropriate, as the sole additional scheme identified was that at 60 Gracechurch Street and this site sits behind 70 Gracechurch Street and as such would have no impact relevant to the cumulative scenario.

647. In the cumulative scenario tested, 7-12 Gracechurch Street, 2-4 Bulls Head Passage, and St Peter Upon Cornhill Church would be identified as experiencing a Moderate Adverse impact, while a Minor Adverse impact would be caused to Jaimaica Buildings, St Michael Cornhill Church, and 50 Cornhill. This is taken in context with the daylight and sunlight impacts of the consented scheme, and the Environmental Statement identifies the chief impacts which result in these changes is the consent at 70 Gracechurch Street.

648. Overall the daylight and sunlight available will be sufficient and appropriate to context and would not be reduced to unacceptable levels, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with, London Plan policy D6, Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040.

Overshadowing

649. The BRE guidelines advise that sunlight amenity is measured on 21st March (spring equinox) and the result is expressed as a percentage of the amenity area that receives at least two hours of sunlight on 21st March, measured through a Sunlight Hours on Ground analysis. The sunlight amenity and transient overshadowing analysis was undertaken in accordance with the Guidelines. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.

650. 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. A

transient overshadowing analysis has been undertaken, identifying the change in shadows cast throughout the year with regards to each identified sensitive receptor.

651. Concerning Sunlight Hours on Ground, 16 of the 17 receptors tested would pass the BRE Guidelines recommendations. Furthermore, 15 of these receptors would experience no noticeable impacts between March and September as would therefore experience a Negligible effect. The outstanding sensitive receptors are St Peter upon Cornhill Churchyard and the public terrace at One Leadenhall.

652. The St Peter upon Cornhill Churchyard would see that the northernmost portion of the amenity space would see a reduction from May to August.This is considered a Minor Adverse impact. The public terrace at One Leadenhall would see a more substantial impact, facing a relative reduction in sunlight hours of 73% against the BRE criteria. This is identified as a Major Adverse impact. The terrace itself is within the Cluster, being an amenity area at a low level in an area identified as being suitable for tall buildings. It is inset, being covered, and therefore at a greater risk of having its sunlight impacted by surrounding developments. Furthermore, it is not considered that the proposed development has any greater impact than would be caused by the extant permission at the site. As such, the sunlight impacts to these spaces are considered acceptable.

Solar Glare

653. 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).

654. 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.

655. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.

656. The BRE guidelines suggest the following in relation to solar glare at paragraph 5.8.3 – 5.85:"If it is likely that a building may cause solar dazzle the exact scale of the problem should be evaluated. This is done by identifying key locations such as road junctions and railway signals, and working out the number of hours of the year that sunlight can be reflected to these points"

657. A Solar Glase assessment has been carried out and forms a part of the Environmental Statement, assessing 17 locations considered sensitive in terms of solar glare.

658. At five locations, a negligible impact was identified. At these locations, instances of reflection would occur on small areas of glazing and/or occur outside of 30 degrees of a road user's line of vision, the result of which being that any reflection would occur for a short time and be within the peripheries of any driver's vision.

659. At the location GS2 (Gracechurch Street travelling north), a Minor Adverse impact was identified. The impact to this location would be reflections visible within 10 degrees to 30 degrees of a road user's vision. This would across different portions of the southern elevation between the hours of 08:00 and 11:00 from September to March.

660. A Minor Adverse impact was also identified at location GS2 (Junction between Gracechurch Street and Lombard Street travelling north). The assessment found potential reflections within 10 to 30 degrees of the driver's line of site, from 11:00 to 13:00 on the lower floors of the southern elevation from September to March. This reflection would occur above the visor line and therefore be shielded when a visor would be used.

661. For the instances of minor adverse impacts it should be noted that the assessment for solar glare assumes the worst-case scenario, that the sun will shine every day during daylight hours. Climate data indicates that this is not the case in the UK generally. Overall, it is considered that the effects on solar glare would be acceptable. The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

662. 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.

663. 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.

664. 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

665. Sensitive receptors identified within the submitted light spillage assessment comprise:

- 2-4 Bulls Head Passage
- Jamaica Buildings
- St Michael Cornhill Church
- St Peter Cornhill Church
- 7-12 Gracechurch Street
- 50 Cornhill

666. All sensitive receptors tested excepting one experience levels of light trespass within the guideline values for both pre- and post-curfew lux limits. The remaining sensitive receptor is 7-12 Gracechurch Street which would experience no transgressions of the 25-lux threshold during pre-curfew times. The property would experience a transgression beyond the post-curfew 5-lux threshold. The assessment does not take into account the mitigation and control possible through a Lighting Strategy, with such a document to be secured via condition, and with any such Lighting Strategy would be expected to comply with the guidance within the City of London Lighting Strategy SPD. There are also

potential transitory impacts on light spillage caused by the deconstruction and construction phases of the development. These impermanent impacts would be addressed through a Deconstruction and Construction Environmental Management Plan as secured via condition. As such, the light spillage impacts of the proposed development are considered acceptable.

Thermal Comfort

667. 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.

668. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared using high resolution Computational Fluid Dynamics (CFD). The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the site, by comparing the predicted felt temperature values and frequency of occurrence

669. The assessment was graded against the City of London Thermal Comfort Criteria, as set out in “Thermal Comfort Guidelines for Developments in the City of London”. Categories are based upon the seasonal percentage for which thermal conditions are acceptable (UTCI values of between 0° and 32°).

670. The thermal comfort conditions have been assessed for entrances, bus stops and amenity spaces, including terraces and balconies. The same spaces have been tested as those assessed for Wind Microclimate. The purpose of the tests is to compare conditions with and without the proposed development. To assess those conditions the following conditions have been tested:

- Configuration 1: Existing Site with existing surrounding buildings;
- Configuration 2: Existing Site with consented cumulative schemes;
- Configuration 3: Proposed Development with existing surrounding buildings;
- Configuration 4: Proposed Development with consented Cumulative Schemes;
- Configuration 5: Proposed Development with Consented and Non-Consented Cumulative Schemes.

671. Consented cumulative schemes within 400m of the proposed site were considered in the configurations as above, and it should be noted that in this circumstance the sole non-consented scheme added to the cumulative scenario was 70 Gracechurch Street (ref: 24/00825/FULEIA) which has since been subject to resolution to grant by the Planning Application Sub-Committee earlier this year.

Configuration 1: Existing Site with existing surrounding buildings

672. In the existing condition, entrances, bus stops and amenity spaces satisfy the target condition, while the 1 Leadenhall north roof terrace is suitable for a mix of seasonal and short-term use meaning it ranges from one category less comfortable than the target condition and satisfying the target condition. The podium level terrace and south roof level terrace at 1 Leadenhall satisfy the target condition.

Configuration 2: Existing Site with consented cumulative schemes

673. The results in this configuration are similar in that the tested spaces mostly satisfy the target conditions in the same way, excepting a change in condition at the 1 Leadenhall south roof terrace which would be one category less comfortable than the target condition. The north roof terrace would remain at conditions ranging from one target less comfortable than the target condition to satisfying the target condition.

Configuration 3: Proposed Development with existing surrounding buildings

674. The assessment notes that overall the introduction of the scheme would generally result in a lessening of comfortability conditions similar to that following the introduction of cumulative schemes undertaken in configuration 2. It also nots that while less comfortable conditions would be caused to Gracechurch Street and within Leadenhall Market to the north of the site, it would make conditions more comfortable on Lime Street to the south east of the site, reducing the area only suitable for short-term use.

675. Entrances on-site and off-site would meet the target condition, the bus stop on Gracechurch Street would meet the target condition, as would the eating area along Lime Street Passae and Leadenhall Market.

676. On-site terraces would meet the target condition, as would the south podium level terrace at 1 Leadenhall, and the north roof terrace at 1 Leadenhall would be consistent with the baseline and the conditions as described in the cases of Configuration 1 and 2. The south roof terrace at 1 Leadenhall would be one to two categories less than the target condition, while the assessment notes that this is driven by a change in winter conditions and with 52% of the season recorded as acceptable in the baseline and 48% of the season recorded as acceptable in Configuration 3. Given the scale of this change, and as the terrace is likely to see reduced use during the winter season, this is considered acceptable.

Configuration 4: Proposed Development with consented Cumulative Schemes

677. In this configuration, on-site and off-site entrances meet the target condition, as does the tested bus stop on Gracechurch Street, and the spill out seating area along Lime Street and Leadenhall Market. On-site terraces also meet the target condition, as well as the southern podium level terrace at 1 Leadenhall. The north and south roof terraces at 1 Leadenhall are one category less comfortable than the target condition.

Configuration 5: Proposed Development with Consented and Non-Consented Cumulative Schemes

678. No material change was found in thermal comfort conditions when compared to earlier configurations.

Conclusion

679. On-site conditions are suitable for the intended uses without landscaping or mitigation measures for all proposed entrances, ground level amenity, thoroughfares and terraces.

680. Off-site conditions for all entrances, bus stops, thoroughfares, crossings, ground level spill out seating and mixed amenity and roof terraces were suitable for the intended use or consistent with the baseline.The inclusion of consented cumulative schemes made conditions generally less comfortable, but did not alter the suitability of any thermal comfort receptor. The inclusion of non-consented cumulative schemes did not have a material impact on thermal comfort conditions.

681. In light of the above, 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.

682. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

Contaminated Land

683. 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.

684. Policy S1 of the emerging City Plan 2040 expects developers to address land contamination.

685. A Phase 2 has been submitted as part of the application, which sets out that chemical testing has been undertaken identifying no elevated contaminants above the proposed end use criteria, and no presence of asbestos was detected. Ground conditions were identified through introduction of ten exploratory bore holes across the site, with shallow monitoring well installations to establish the underlying ground has regime.

686. The ground conditions were found to be primarily made ground underlain by river terrace deposits, the latter being superficial deposits over the solid geology of the London clay formation. Groundwater was generally indicated to present at between 5.07m and 7.68m

below basement level. Low to negligible concentrations of methane/carbon dioxide were found on site, and low to negligible gas flows.

687. On the above basis, it concludes that no ground gas protection measures would be required subject to completion of further ground gas monitoring, and no remediation works are considered necessary to enable the end use of the site. The report recommended that given the presence of elevated lead in the made ground across the site, appropriate dust control measures should be employed during excavation and construction, and personal and respiratory protection measures provided to all relevant workers. This would be secured via condition. Also secured via condition would be a risk assessment for construction workers, and a condition in respect of the process/remediation if contamination is found when carrying out the proposed works. Subject to the imposition of these conditions, the proposal is in accordance with Local Plan policy DM15.8 and policies S1 and HL4 of the draft City Plan 2040.

Air Quality

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

689. The application submission includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction, and operational phases of the development.

690. 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.

691. 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.

692. The proposed development would be car-free, and the energy strategy including heating and hot water is all-electric. No combustion plant is proposed for the primary energy strategy, while four generators are proposed. Three of these generators would be for life-safety purposes, only routinely used for testing and maintenance, and one would be used for business continuity. Exhausts would be located 1.5m above roof level in a good dispersion environment. Furthermore, the generators would use hydrotreated vegetable oil, reducing NOx emissions compared to similar generators using diesel as a fuel source. While the Air Quality Assessment recognises that the proposed generators, during testing and maintenance, may lead to high 1-hourly mean NO2 concentrations, there is a very low probability of the 1-hour mean concentration objective being exceeded as a result of this, and testing would be carried out outside of normal business hours to minimise impacts so far as practicable. 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.

693. 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.

694. The City's Air Quality Officer has no objections to the proposals. Conditions are recommended in relation to the requirement for a revised Air Quality Positive Assessment to ensure that the proposed development maximises benefits to air quality, to Non-Road Mobile Machinery Register details, details of ventilation and extraction equipment specifically in relation to the market, and the requirement for a Local NO2 Monitoring Strategy as part of the Construction Environmental Management Plan.

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

Noise and Vibration

696. 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.

697. 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.

698. 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 and should be operated and maintained appropriately. Noisy activities will be limited to certain times to minimise their overall 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.

699. 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.

700. 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 when appropriately controlled via condition.

701. 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 each of the commercial elements and the proposed public hall, Roman forum-basilica exhibition space and

Heritage Walkway 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.

702. Environmental health officers have confirmed, that subject to the recommended conditions, they would have no objections with regard to the noise impacts.

703. 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).

Health Impact Assessment

704. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments. 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".

705. The application is accompanied by a Health Impact Assessment (HIA) (produced by Quod) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health impacts.

706. 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.

707. 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.

708. 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:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
- Excellent cycle facilities which will encourage and support active transport by building users.
- Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site.
- The Site is well located with good pedestrian and cycle routes, promoting users to choose active modes of travel coming to and from the Proposed Development.
- The Proposed Development provides greening across the terraces, to create a relaxing working environment and help with wind discomfort.
- Provision of high-quality public realm at the ground floor, a new public hall and a new route through the Site improving the physical environment and contributing to social cohesion.
- A car-free development minimising vehicles travelling to the Site and reducing emissions.
- Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage. The Proposed Development targets a BREEAM Outstanding rating.
- Consideration to sustainability and inclusive design.

709. 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 to promote construction and operational jobs to people within the local community and including disadvantaged groups, which would be secured via planning obligation. This 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.

Sustainability

710. After the approval of the previous scheme, the discovery of archaeological remains below the current basement of the site introduced significant challenges in terms of programming as well as for the rearrangement of the proposed basement in size and relocation of basement uses to other areas above ground within the proposed building, in order to retain the ruins of the discovered Roman basilica. As part of updated proposals for the site, the surviving remains will be incorporated into a new public exhibition, event space, and immersive experience, in partnership with the London Museum. This resulted in the adaptation of the structure and efficiency considerations for the cores. Consequently, the tower is now approximately 8 meters shorter, and structural frame bridging over the archaeological remains had to be incorporated.

Circular Economy

711. 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.

712. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site. An independent reuse and materials audit that covers the GLA's pre-redevelopment audit requirement has been undertaken for that purpose.

713. The existing 8-storey building was constructed in 1935 and most recently refurbished and extended in 1997. The existing structure is steel framed with hollow pot floors and concrete toppings. The steel columns are cased in masonry, and the only structural internal walls are those of the cores. The constraints of the existing building can be summarised as follows:

- layout characterised by irregularly shaped floorplates that are reliant upon a series of lightwells with overall poor natural light levels across office spaces
- ground floor retail units without level access
- no existing outdoor amenity spaces
- low floor to ceiling heights (c.2.6m on typical office levels)
- cluttered roofscape
- facades of poor condition and energy efficiency
- outdated building services.

Pre-redevelopment audit optioneering

714. The reuse and materials audit includes an options assessment that details how different development options would address circular economy, establish the potential of retention, reuse and carbon impacts of different materials. Whole life-cycle carbon impacts of the options are set out in the whole life-cycle carbon emissions section of this report which includes an options evaluation with regard to opportunities for wider environmental sustainability benefits and other planning benefits in order to address the

economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2024, chapter 2, paragraph 8.

715. For the reuse and materials audit, the following options were assessed:
    - Option 1: Minor refurbishment (no replacement MEP); 100% retention
    - Option 2: Major refurbishment (new MEP and upgrade to facades, no extension); retention of 100% substructure, 95% superstructure and 60% facades
    - Option 3: Major refurbishment (as option 2, lightwell infill, demolition of 8th floor and 6-storey extension); retention of 40% substructure, 63% superstructure and 60% facades
    - Option 4: New construction, 32 storeys; 3% front façade

716. The optioneering assessment demonstrates that options 1 and 2 would retain the building's structure and facades. In option 1, due to the limited number of interventions, only the finishes, fittings and some internal walls associated with a new tenant fitout would be replaced. Its longevity would be compromised by the need for potential replacement of all building services in the near future which option 2 would provide from the start, accounting for its higher embodied carbon impact.

717. Option 3 would partially retain existing structure and facades, and it would provide additional, high quality floorspace but this would result in significant structural intervention, carbon emissions and costs. Options 1-3 would come with limitations to the quality of the retained floorspaces and commercial viability on this City Cluster site. These options would also lack the longevity, flexibility and adaptability of Option 4 and only reduce demolition and construction waste in the short term without the benefits the site could deliver for futureproofing the wider City. The applicants therefore consider option 4 as preferred approach for the site, along with a strategy to encourage maximum reuse of the deconstruction material as detailed in the demolition audit accompanying this application.

718. The explored optioneering is considered to comply with the GLA's Circular Economy Statement Guidance and the Corporation's Carbon Options Guidance Planning Advice Note that provides the tool for maximising retrofit and reuse as set out in the Planning for Sustainability Supplementary Planning Guidance. The assessment of the carbon intensity of the options and their evaluation in the round is set out in the whole life-cycle carbon emissions section of this report.

The application proposal

719. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.

720. The proposed development is a new build with a rebuilt and adapted historic façade. A pre-demolition audit with a detailed material inventory has been submitted that estimates that 10% of material by weight can be reused on site, 85% can be recycled offsite, and 5% can be re-used offsite. The largest quantities by weight that can be reused are Portland stone and face bricks, rockwool insulation, timber framing, structural steel, marble, ceiling tiles, doors and carpet tiles. The largest quantities by weight for recycling are concrete, masonry, structural steel, plasterboard, glazing, insulation and aluminium window frames.

721. The audit includes detailed quantification of materials, split by building element, clearly identified links and contacts for reuse marketplaces that can be taken up by any demolition contractor. The condition and recovery potential of key materials and products are clearly identified and set out for future consideration and to support decision-making. The applicants commit to meeting all mandatory GLA waste requirements.

722. The circularity approach for the new building incorporates principles of:

<u>Longevity</u>

- Durable materials, such as glass reinforced concrete, and durable, unitised curtain wall panels
- Robust substructure and lightweight superstructure
- Flexibility through designated riser spaces for tenants that can accommodate a variety of services

<u>Flexibility and Adaptability</u>

- Modular design of small format 1.5m wide curtain wall panels with easy to replace or maintain glazing and gaskets, and easy to adapt to changes in internal layouts
- Highly adaptable superstructure to enable modifications and alterations
- Integration of building services via penetrations in the steel beam that allow for easy modifications or replacements
- Flexibility in floor layouts

<u>Disassembly, recoverability and reusability</u>

- Mechanical connections between elements, e.g. bolted connections of the composite steel system
- Pre-fabricated, pre-cast concrete balcony panels that can be disassembled
- Ease of disconnection and dismantling of building services and of access for replacement

  Designing out waste
- pre-fabrication to optimise material use and construction efficiency
- use of high strength steel to reduce material quantity
- Proposal to develop a Disassembly Guide to be requested by condition.

723. A condition is recommended for an update to the Circular Economy Statement prior to the commencement of construction, and a post-completion update, to confirm that high aspirations can be achieved.

Operational energy strategy and carbon emissions

724. The Energy Statement outlines the operational energy strategy in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 18% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building (the 'Part L baseline').

725. A passive design approach is adopted to achieve 13% 'Be Lean' savings beyond the Part L baseline. The design of the building incorporates enhanced thermal performance and natural ventilation as well as self-shading through deep columns and overhangs and a higher framing ratio where needed. Energy efficient building services have been specified, including ventilation heat recovery between exhaust/return air, and for unregulated energy uses such as lifts.

726. There are currently no available or proposed district heating networks in the local area. The for the previous application agreed provision of a potential heat exchanger location in basement 1 can no longer be provided as it would conflict with the ability to retain the archaeological remains in-situ as agreed with Historic England and the Greater London Archaeological Advice Service. This has therefore been omitted from the design.

727. A system of 71 photovoltaic (PV) panels, providing 2.1% of the total annual operational energy demand, and air source heat pumps are proposed as low and zero carbon (LZC)

technology solutions. The total 'Be Green' savings beyond the Part L baseline currently stand at 5%.

728. The proposed energy strategy demonstrates that the proposed building would achieve a 18% reduction in regulated carbon emissions under Part L 2021. It does not meet the GLA's 35% target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for non-domestic buildings. Due to the proposed building's form, limitations to available space for PV panels and its unique mix of uses, the energy efficiency of the design cannot be reflected 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 basing the operational carbon performance on the actual, modelled whole building energy use intensity (EUI). As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

Energy Use Intensity (EUI)

729. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m2(GIA)/year and a space heating demand of 15 kWh/m2(GIA)/year (regulated). The estimated EUI of the proposed development is 68.6 kWh/m2/year and for the space heating demand 8.0 kWh/m2/year.

730. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - is dependent on the level of occupancy and operation of the building.

731. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

732. The proposed development has been pre-assessed under BREEAM 208 New Construction v3 - shell & core (office). The development is targeting an 'outstanding' rating with a weighted score of 87.63% for the pre-assessment and an aspiration to improve the score at post construction. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

733. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. A post construction BREEAM assessment is required by condition.

NABERS UK

734. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposed NABERS Design for Performance target is a minimum of 5 stars (out of 6 possible) rating and a detailed Design for Performance assessment will be carried out through RIBA stages 3 and 4.

Whole life-cycle carbon emissions

735. 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.

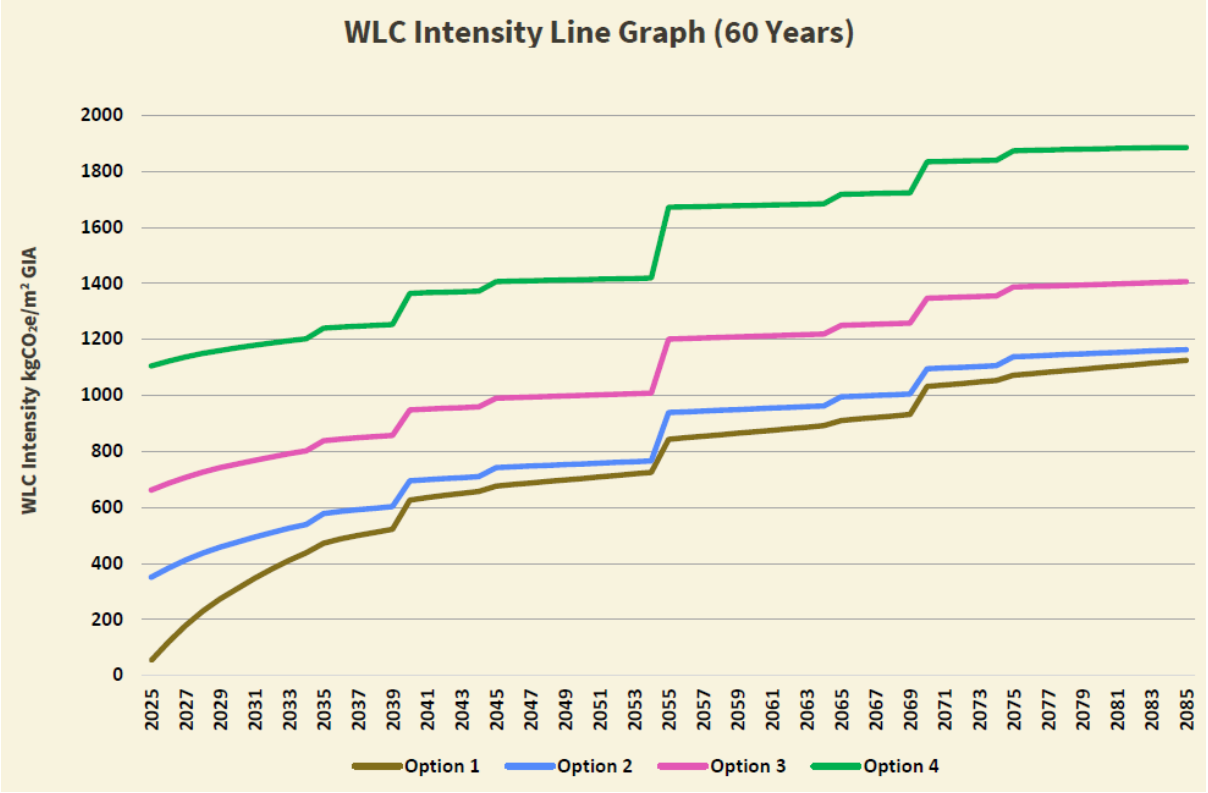
Carbon options

736. The GLA's Whole Life-Cycle Carbon Assessment guidance requires applicants for referrable applications to confirm that options for retaining existing buildings have been fully explored. The emerging City Plan 2040 requires all major development to undertake an options assessment of in line with the City Corporation's Carbon Options Guidance Planning Advice Note, to establish the most sustainable and suitable approach for the site.

737. The carbon optioneering exercise undertaken for the site includes the following 4 options:

- Option 1: Minor refurbishment (no replacement MEP); 100% retention; 8,589 sqm GIA
- Option 2: Major refurbishment (new MEP and upgrade to facades, no extension); retention of 100% substructure, 95% superstructure and 60% facades; 8,238 sqm GIA
- Option 3: Major refurbishment (as option 2, lightwell infill, demolition of 8th floor and 6-storey extension); retention of 40% substructure, 63% superstructure and 60% facades; 14,105 sqm GIA
- Option 4: New construction, 32 storeys; 3% front façade; 36,306 sqm GIA

738. The following graph and table present the whole life-cycle carbon results of the options:



	Minor Refurbishment	Major Refurbishment	Major Refurbishment With Extension	New Build
Option Reference	**Option 1**	**Option 2**	**Option 3**	**Option 4**
Project Reference Period	60	60	60	60
Gross Internal Area (m2 GIA)	8,589	8,238	14,105	36,306
Net Internal Areas (m2 NIA)	6,458	Unknown	10,758	23,310
Change in GIA vs. Existing	-	- 351	5,516	27,717
Change in NIA vs. Existing	-	Unknown	4,300	16,852
Substructure % retained by mass	100%	100%	0%	0%
Superstructure % retained by mass	100%	95%	63%	0%
Total WLCA (incl. B6 & pre-demolition) kgCO2e/m2 GIA Module B7 is not considered	**1,125**	**1,168**	**1,411**	**1,898**
Upfront Embodied Carbon excl. sequestration (kgCO2e/m2 GIA)	54	351	662	1,105
In use and End of Life Embodied Carbon excl. B6 & B7 (kgCO2e/m2 GIA)	355	463	485	602
Estimated Whole Building Operational Carbon for building life time (B6) kgCO2e/m2 GIA)	711	347	258	179
Total WLCA (incl B6 & pre-demolition) (tCO2e) Module B7 is not considered	9,659	9,625	19,903	68,896
Total existing building demolition (tCO2e)	43	58	85	436
Upfront Embodied Carbon (A1-A5) (tCO2e)	464	2,892	9,338	40,118
In Use Embodied Carbon (B-C) (tCO2e)	3,049	3,814	6,841	21,856
Operational carbon for building lifetime (B6) (tCO2e)	6,104	2,862	3,640	6,486

739. Due to the light touch nature of the refurbishment in option 1, this will overall be the lowest carbon option, although the much higher operational carbon impacts - as only minor upgrades to the MEP systems are included – would result in a steeper increase of carbon impacts compared to option 2, almost reaching the level of option 2 after 30 years. The consultants consider higher embodied carbon impacts than shown would be likely due to the need for further façade and MEP interventions sooner than in the other options.

740. Option 2 presents a more comprehensive retrofit with, compared to option 1, a doubling of embodied carbon through new MEP installations, and only half of operational carbon impact due to new MEP and façade upgrades. Option 2's WLC graph after 60 years would be at a very similar level as option 1, but any higher economic feasibility due to improving the internal quality and energy efficiency for occupiers would need to be balanced against the loss of net internal floorspace caused by the upgrading of wall insulation and plant space requirements.

741. In option 3, the existing 8th floor is replaced by 6 new storeys, along with a lightwell infill, structural strengthening, all new fit-out and MEP. This option can also include a public and flexible ground floor to provide permeability into Leadenhall Market, as well as incorporate alterations to the basement footprint and depth to protect the archaeological finds. Compared to option 2, this option would cause a significant increase in embodied carbon impact due to the higher level of new build, however, its operational carbon would reduce further due to higher efficiencies of the MEP services systems across existing and proposed floor levels and due to replacement glazing, overall resulting in 243kgCO2 higher WLC carbon impact per square meter, and with an overall improved commerciality compared to options 1 and 2. Option 3 provides more opportunities for sustainability improvements such as the incorporation of a roof terrace, urban greening, climate resilience measures, photovoltaics, building efficiency and high quality of the new build elements over options 1 and 2.

742. Option 4 represents a new build with re-instated front façade to protect the historic character of the street frontage. This option maximises the floorspace potential of the site in the City Cluster, including 2 basements and 32 storeys above, and therefore it would have the highest absolute WLC emissions and the highest WLC carbon impact per square meter compared to the other options. However, the operational carbon intensity would be the lowest of all options throughout the lifetime of the development as the highest façade and MEP efficiencies can be achieved in new builds.

743. Option 2 and 3 could delay the high carbon investment of a redevelopment until the decarbonisation of the grid and of industry processes will bring embodied carbon emissions closer to the net zero target. However, these options would not be able to deliver on the significant opportunities of this development to drive the wider sustainability of the City context and supplement Leadenhall Market with a high quality, flexible, public space and to integrate a Museum of London facility linked to the recently discovered archaeology and the market as major visitor destination, in addition to creating high quality office space with well-being benefits. Option 4 would facilitate greywater and rainwater harvesting, extensive urban greening, photovoltaics, accessible outdoor spaces, blue roofs, optimised facades and MEP systems and long-term climate resilience. The applicants therefore consider Option 4 the preferred approach for the site to achieve long term improvements to the sustainability of the site and to futureproof the wider City context, as set out in the final conclusion of this report.

744. The optioneering approach summarised in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City Corporation's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

745. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in Policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2024 stating in paragraph 161 that the planning system should support the transition to net zero by 2050 and paragraph 164 that new development should be planned for in ways that help reduce greenhouse gas emissions. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

The application proposal:

746. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. As the base carbon value of the proposal, due to its building typology, is high, the applicants have at this stage committed to implementing the low-carbon opportunities listed below that were verified as achievable by the 3rd party reviewers:
    - high contents of cement replacements in the substructure elements with up to 70-90% cement replacements, or any other measure confirmed at RIBA stage 4 to meet or exceed the proposed embodied carbon specification for concrete
    - low carbon (hydroelectrically produced) extruded aluminium elements of the façades
    - 40% re-used or other low carbon raised access floors
    - site activities, targeting 30 kgCO2e/m2GIA A5 (excluding waste) by minimising the use of fossil fuels
    - steel mix for rolled steel sections that includes reduced carbon made products, such as electric arc furnace produced steel.

747. The existing façade would be dismantled and rebuilt using the existing stone elements and cast iron spandrel panels.

748. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development's embodied carbon emissions can be reduced significantly but fall short of the GLA's Standard Benchmark for upfront embodied carbon emissions. The measures listed below could contribute to achieving embodied carbon emissions that would help to meet the Standard Benchmark. These will be considered during the detailed design stages and include:

- low carbon plate steel and rebar for concrete
- reducing carbon from transport emissions for rebar
- maximising the use of low carbon steel for rolled steel sections
- maximise utilisation of reused raised access floor tiles or low carbon Calcium Sulphate alternatives.

749. The GLA Guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring to follow this Version 2's requirements when completing a whole life-cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicants therefore created a hybrid modelling approach (called 'RICS version 1 assessment with appropriate amendments') which is aligned with RICS Version 1's methodology but makes necessary updates to modelling items such as baseline material assumptions, transport distances and waste rates. These would typically result in a approx. 10% higher carbon intensity compared to using the Version 1 assumptions, and the results would ensure that the modelling will be relevant and fit for purpose for new schemes. The GLA did not comment on this approach in their response to the WLCA, and this approach therefore is considered to be acceptable.

750. The table below shows baseline whole life-cycle carbon emissions per square meter (using the modelling approach as set out in the previous paragraph) for the building in relation to the GLA benchmarks for offices at planning application stage.

Scope	Proposed (RICS V1 with appropriate amendments)	Benchmark	GLA benchmark
RICS components	kgCO2/m2	kgCO2/m2	
A1-A5	1,110	< 950	GLA standard
		< 600	GLA aspirational
A-C (excluding B6-B7)	1,557	< 1,400	GLA standard
		< 970	GLA aspirational
B6+B7	548		

A-C (including B6-B7)	2,104		

751. The WLC RICS Version 1 Assessment Spreadsheet calculates that the proposed development would result in 76,444,192 kg CO2e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 19,889,590 kg CO2e (26% of the building's whole life-cycle carbon), and the embodied carbon emissions for 56,554,602 kg CO2e (74% of the building's whole life-cycle carbon).

752. A detailed whole life-cycle carbon assessment and a confirmation of the post construction results are required by conditions.

753. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan Policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic Policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 Policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with NPPF (2024) paragraph 161.

Climate Resilience

754. As referenced above, significant urban greening along the east, west and upper south elevations from levels 8 to 28 where 1.5m deep planters are proposed. The Level 05 terrace would feature woodland inspired planting and climbing plants on steel trellis would provide vertical greening to buildings columns, whilst larger shrubs with high wind tolerance are placed at terrace edges to provide shelter. Greening of the edge of the level 30 terrace is also proposed, and greening as a whole is a fundamental part of the architectural approach. The development achieves an Urban Greening Factor (UGF) 0.37 which exceeds the exceeds the London Plan (2021) Policy G5(B) UGF target of 0.3.

755. In line with the extant consent, the proposed façade design has considered an optimised glazing ratio, and minimises solar gain during summer months with the recesses and

overhangs across each elevation providing a degree of solar shading. Ventilation is provided through heat recovery units. The use of green infrastructure at vertical locations will also contribute to resilience against overheating to some degree, provided this is well-chosen and remains maintained.

756. Turning to flooding, the proposed development is predicted to be of low risk of flooding from all sources, including surface water flooding. A blue/green roof system is proposed in order to attenuate stormwater, alongside other Sustainable Drainage Systems such as greywater harvesting and rainwater harvesting.

757. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

758. A carbon options study has been carried out based on a thorough analysis of the existing building on site to establish carbon impacts, opportunities and constraints for environmental sustainability and to inform the intended transformation of the site including making the recently discovered archaeological remains of the Roman basilica publicly accessible which required the redesign of the tower's substructure and superstructure. Significantly lower WLC carbon impacts below the GLA's Standard Benchmark would be achievable only by the much lower retrofit options, however, none of these would be able to deliver significant public benefits such as the cultural offer, including public access to archaeology, of the Museum of London, and only the retrofit with extension could facilitate the addition of a new market hall with Leadenhall Market for extended permeability and amenities in the City Cluster.

759. Highest quality floorspaces with high amenity and wellbeing values can only be delivered by a redevelopment option on this site. The proposed development would optimise the quantity of floorspace for offices and for a mix of cultural and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the

City of London against a range of environmental, social and economic sustainability challenges.

760. The proposed development would reach close to the GLA's Standard Benchmark for life-cycle embodied carbon, with benefits relating to improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for recycling and reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in 18% carbon emissions beyond the Part L baseline, and an estimated low energy use intensity (EUI), as well as targeting a BREEAM "outstanding" rating. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the potential performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, and it cannot avoid demolition in accordance with Policy CS15(3), it complies with it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Archaeology

761. 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

762. The site lies over part of the buried remains of the first century AD forum and basilica of Roman Londinium, which was superseded by a much larger second forum-basilica complex between AD 100 and AD 130. 85 Gracechurch Street overlies the north-east corner of the first forum and basilica and a section of the eastern parts of the second forum courtyard and eastern range of second forum buildings. The forum-basilica has very high archaeological and historical significance for its role in the history of the day to day government and economic life of London and the Roman province of Britannia. The basilica would have been home to the civic administration and the forum was the central marketplace from the late 1st to the 3rd century. The forum-basilica complex has been rediscovered in a series of archaeological excavations and 'rescue' recording exercises conducted through the 19th and 20th centuries.

763. Since the granting of the extant consent, initial investigations carried out by MOLA at the site have revealed areas of high survival of the original forum and basilica which far exceeded the extent originally anticipated. These most recent works have established that the remains of the first Roman forum-basilica have a good survival on site, although some truncation is expected from the current and previous buildings on site. In addition, remains of the second forum are also likely to be present, potential remains of a medieval building called the Garner, and remains from the post-medieval period related to the Spread Eagle Inn. The Environmental Statement describes the retention of display of the remains as a beneficial effect of the development with regards to archaeology, alongside the proposed synthesis and re-examination of all records previously produced for the forum-basilica.

764. GLAAS have provided their response, confirming that the remains of the first forum-basilica, and potentially any remains found of the second forum, would be considered nationally important while also not a formally Schedule Ancient Monument and therefore appropriate to manage under the planning system. They set out their view that an unacceptable level of harm has been avoided by the proposed retention of the first forum Tribunal remains, and that they consider the overall harm caused by the minor loss of archaeological remains necessary to construct the building cause a moderate level of less than substantial harm. They describe this as residual harm, largely offset by the significant public benefits from revealing and interpreting the site's significant. They also recommend conditions concerning investigation, excavation, evaluation, preservation, basement and foundation design, public engagement, and a management plan, all of which would be attached to any decision. A Archaeological Exhibition Space Management Plan would also be secured via s106 obligation.

765. Officers agree that the remains of the Roman Forum-Basilica are of comparable significance to be considered as a schedueld monument (per NPPF fn 75). The significant, substantive elements of these remains would be preserved, conserved and revealed to public view. This would be a major benefit that would far outweigh the impact of the scheme on the residual archaeological deposits, which would in any case be appropriately managed and mitigated through a programme of recording, excavation, evaluation and publication.

766. 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

767. 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.

768. 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.

769. The site is well-served by public transport, including London underground from Bank and Monument, national rail links from Fenchurch Street and buses from Leadenhall Street and Bishopsgate. It is noted that neither Bank or Monument are step free and the closest step free underground station is Liverpool Street Station, all underground stations exceed the recommended 50m travel distances without a rest.

770. Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. No specific drop-off points are

identified with informal drop-off anticipated along Cornhill and Leadenhall Street which are both circa 120m or on Lime Street which is 70m from the site.

771. Due to the limited space at ground floor, it has not been possible to provide any off-street accessible car parking. There are two blue badge car parking spaces located within George Yard located over 50m away from the site. However, it is acknowledged that these are not substitutes for an off-street bay, for example due to the parking controls which limit the hours that they can be used, they cannot be booked in advance and are a distance away.

772. The walking distances from key public transport nodes, safe drop-off points 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. A request has been made to TfL to include within the scope of the s278 agreed with the application the exploring of opportunities to provide such resting points.

773. 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.

774. 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.

Office Entrance

775. 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.

776. The primary office entrance from Gracechurch Street is formed by two drum barrel doors and the secondary entrance off Lime Street Passage is formed by double swing doors. Providing entrances into the office which are easily identifiable and allows everyone to

use the entrance independently without additional effort, separation or special treatment.

777. 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.

778. Due to limited space at ground floor office visitors would be guided through the security barriers upon arrival with the primary reception facilities located on the office floors. 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.

779. An Inclusive Access Management Plan (IAMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.

Cycle and End of Trip Facilities

780. The long and short stay cycle parking would be accommodated at level four and is access via east end of the public hall. The internal access to the cycle store is via cycle lift, two lifts are provided. 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.

781. Two further short stay accessible cycle spaces would be provided within the public hall in close proximity to the cultural entrance and retail space.

782. 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.

783. Routes from the cycle store to end of trip facilities, located on level 03, and into the primary office accommodation would be logical and doors along routes would be

automated or power assisted. Accessible end of trip facilities would be provided centrally within the floor plate in close proximity to the lifts, providing an accessible shower, toilet and lockers, further detail would be secured by condition.

Vertical Movement

784. 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 four EVAC lifts. A platform lift would provide additional access from the public hall to the mezzanine retail space. Further detail regarding the design, management and maintenance of all lifts will be secured via condition.

Horizontal Movement

785. 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.

Cultural Space

786. The proposal includes cultural use within the basement and a public terrace at level 05. Access will be from the public hall via a lift serving both the basement and level 05 terrace and there will also be a staircase providing direct access to the basement from the public hall. The access to both the basement and the public viewing terrace at level 05 has 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.

787. 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 condition and an IAMP.

788. 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.

Evacuation and Fire Safety

789. Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

Public Realm and Amenity Terraces

790. 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.

791. The detailed design for the level 05 terrace should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

Public Realm and Amenity Terraces

792. The office terraces are accessed via 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.

793. 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).

Sanitary Facilities

794. Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry. This has not currently been demonstrated, and further detail is reserved by condition.

795. 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.

796. The cultural space provides accessible, ambulant toilets and baby changing facilities at basement level, no sanitary facilities are provided at level 05 and users of the terrace are expected to use the facilities in the basement. Further detail will be secured via condition

797. 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.

Signage and Wayfinding

798. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of 'two senses'. Details of signage and wayfinding will be secured by condition.

Inclusive Co-curation of Archaeological Exhibition Space

799. An obligation for inclusive curation would be secured in the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

Access and Inclusivity Conclusion

800. 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 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.

801. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Security

802. London Plan Policy D11 ('Safety, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

803. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 ('Security measures in new developments and around existing buildings') seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

804. 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.

805. 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, in addition to the consultation and liaison carried out with the City of London Police in the extant scheme.

806. The site would be protected HVM resistant bollards located at the building entrances at ground floor level. The bollards would be automated at these vehicle entrances to enable vehicles to access the building. These would be on private land within the site. The office entrances and public through-route are now separate, distinct from the extant scheme, while the office entries would be manned be security personnel preventing pedestrians from accessing the office lift lobbies at ground floor. Between 19:00 and 07:00 the office entries would be secured and require swipe card access, preventing any unauthorised access.

807. Concerning the public spaces at basement level and level 05, the check-in strategy would comprise of an initial ticket validation, at the ground floor before visitors can access the lower level and therefore access to these public spaces. Appropriate security checks would be undertaken, and further details of the operational and management elements of the overall security strategy would be secured via condition, and a Visitor Management Plan secured as an s106 obligation.

808. The proposal, subject to conditions and s106 obligations, is considered to be in accordance with London Plan Policy S11, Local Plan Policy DM3.2 and draft City Plan Policy S2.

Suicide Prevention

809. The City Corporation has an approved guidance note “Preventing Suicide from High Rise Buildings and Structures” (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades. 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. Further details about suicide prevention measures for the Public Viewing Deck will be secured via condition.

810. Those areas at specific risk within the proposal include the amenity space at higher levels of the building, and the publicly accessible space at level 05. At each of these spaces, defensive planting and balustrading which would appropriately mitigate risk is proposed and further details of suicide prevention measures alongside an associated risk assessment would be secured by condition.

Fire Safety

811. London Plan Policy D12 requires that all developments achieve the highest standards of fire safety to ensure the safety of occupants and efficient evacuation in case of an emergency. London Plan Policy D5 further mandates that the building design incorporates provisions for safe and dignified emergency evacuation for all users, including those with reduced mobility.

812. A Fire Statement, prepared by Arup, was submitted with this application, in line with London Plan Policy D12 B for major developments. The statement outlines a comprehensive fire safety strategy for the building, which includes:

1. A phased evacuation strategy;
2. Refuge locations with emergency voice communication systems provided on each level within each fire-fighting shaft;
3. Evacuation lifts, used to assist occupants who cannot evacuate independently using the stairs;
4. Fire-fighting shafts with mechanical smoke protection;
5. Fire-fighting stairs with wet riser provision;
6. An automatic fire detection and alarm system throughout the building;
7. An automatic sprinkler system throughout;
8. All elements of structure achieving a period of 120 minutes fire resistance;
9. Compartment floors throughout the building, achieving a period of 120 minutes fire resistance;
10. External fire spread protection from neighbouring structures; and
11. The basement being provided with a mechanical smoke clearance system.

813. Details of inclusive emergency procedures would be requested under the Inclusive Access Management Plan to ensure escape routes and staff training has been considered for disabled people including where there is not a separate firefighting and evacuation lift.

814. The City's District Surveyor has reviewed the Fire Statement and raised no objection, confirming that the proposal complies with London Plan Policies D5 and D12. A condition would ensure the development is undertaken in accordance with the approved Fire Statement. Accordingly, officers consider the proposed development is acceptable in terms of fire safety.

Assessment of Public Benefits and paragraph 215 NPPF balancing exercise

815. Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess. Under Section 72 of the same Act, the Corporation also has a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. Considerable importantance and weight must be given to the duties in sections 66 and 72 when carrying out the balancing exercise set out in paragraph 215 of the NPPF.

816. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 212 and 213).

817. A low level of less than substantial harm is found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I).

818. Given the proposal would result in harm to the significance of a Conservation Area, and of listed buildings, including Grade I listed buildings, there is a strong presumption

against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits. Paragraph 215 of the NPPF, which states 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Paragraph 216 of the NPPF states that 'the effect of an application of 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 significant of the heritage asset'.

819. Paragraph 218 then sets out that 'local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'.

820. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a designated heritage assets and weighing that harm against the benefits. The decision maker does not have go about balancing harm against benefits in a particular way.

821. The National Planning Practice Guidance states that "public benefits…could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits".

822. The key social, environmental, and economic public benefits of the proposal are considered to be as follows:

Economic Benefits

823. Securing a strategic mixed-use development within the City, that would provide land uses which support the diversification, vitality and growth as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the provision of an uplift of c. 24,000 sqm delivering approximately 1.5% 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 between 1,700 and 2,205 full-time equivalent (FTA) jobs, an uplift of 1,260 to 1,630 FTE jobs, and increased spending in the locality boosting local businesses and a post-covid resurgence including job creation through construction. This is a benefit which should be afforded moderate to high weight.

824. The provision of a unique retail offering through the Public Hall and its associated spaces, supporting and diversifying its primary business function complemented by attractive overspill external space, will enhance the quality, vibrancy, and activity of the area and so contribute to the City's economy and character and provide amenities for its visitors, businesses, workers and residents, particularly in this important location adjacent to Leadenhall Market.

825. The proposed cultural and exhibition space would create a compelling and inclusive public offer in the area in line with the Destination City agenda and increase spend, as well as drive daytime, evening and weekend footfall and provide a more diverse leisure opportunity for workers, residents and visitors.

826. The overall quality of the development would transform and regenerate this important site within the City Cluster, with attractions further enriching the distinct local character through improved public realm, wayfinding and cultural proposals and would improve worker wellbeing and productivity as well as encourage wider investment and complement existing neighbourhood leisure experiences.

827. Collectively, their nature and extent, the aforementioned benefits, are attributed moderate to high weight.

Environmental Benefits

828. The proposed building, its east west through route, its improvements to Gracechurch Street, and the provision of the Public Hall, result in an exemplary modern building of high architectural quality, considered to build on the spirit of the place, its local history and its distinctiveness.

829. The proposals result in slight enhancements to the Conservation Area as follows:

(i) the restoration of the principal historic façade of 85 Gracechurch Street;
(ii) the reinstatement and reinterpretation of a historic space through the site; and

(iii) the further activation of the streetscape surrounding the market, amplifying a sense of the historic experiential setting to the market which would have been defined by the bustle of diverse commercial trade and consumption (D9 C:1;d-e).

830. The proposal would deliver significant commercial floor space in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy and would promote active travel for a range of users.

831. The significant increase and extent of urban greening on the buildings and in the public spaces would provide a healthy, sustainable and biodiverse environment for all to access. The urban greening would achieve a UGF score of 0.37, in line with the emerging City Plan Policy targets.

832. Securing a development that is environmentally responsible in that it would seek to reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles, including an all electric energy strategy.

833. The abovementioned benefits should be afforded moderate weight.

Social Benefits

834. The proposals will improve this part of the city by delivering a more inviting, pleasant, safer and easily accessible, inclusive and well-connected place for all through the resinstatement of an east west through route, improving permeability in the area and creating an additional link between Leadenhall Market and Gracechurch Street, attracting a greater and more diverse range of people to the City at different times of the day and on different days of the week.

835. The proposed Heritage Walkway provides an attractive elevated public space offering unique views across this part of the City, given its proximity to the Grade II* listed Leadenhall Market and its views towards the Grade I listed Lloyds of London, linking together the surrounding context of London through different eras and the Roman forum-basilica at basement level.

836. This unique and compelling mix of public cultural uses would attract visitors, increase tourism, support and enhance the aspirations of Destination City. The above social benefits are collectively afforded moderate weight.

837. The public exhibition of the for the nationally significant archaeological find of the first Roman forum-basilica of London in-situ, and associated spaces for educational purposes as well as display of other archaeological remains found on site, constitutes a significant social benefit.

Conclusion

838. A When applying paragraph 215 of the NPPF, the above-mentioned public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report.

839. When carrying out the balancing exercise, the less than substantial harm caused to the Church of St Michael Cornhill and Tower Bridge as Grade I Listed Buildings and as such designated heritage assets of the highest order, and to the Bank Conservation Area must be taken into account and afforded great weight.

840. When carrying out the Para 215 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the listed buildings or their setting and to the desirability of preserving or enhancing the character or appearance of the conservation area. Giving the statutory duties considerable importance and weight, in this case it is the view of officers that there is clear and convincing justification for the harm and the collective package of the public benefits secured, which flow from the development proposals, would outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with Para 215 of the NPPF.

CIL and Planning Obligations

841. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

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

843. 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, the first stage of which is installation of the basement level 2 slab, because the earlier phase would not create any additional floor space.

844. 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).

845. CIL contributions and City of London planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	**Contribution (excluding indexation)**	**Forwarded to the Mayor**	**City's charge for administration and monitoring**	**Payment Terms**
MCIL2 payable	£5,129,344.98	£4,924,171.18	£205,173.80	Upon installation of the basement level 2 slab

City CIL

Liability in accordance with the City of London's policies	Contribution (excluding indexation)	Available for allocation	Retained for administration and monitoring	Payment Terms
City CIL	£2,121,750.00	£2,015,662.50	£106,087.50	Upon installation of the basement level 2 slab

Section 106 Obligations

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

Planning Obligations (excluding indexation)	Contribution (excluding indexation)	Available for allocation	Retained for administration and monitoring	Payment terms
Affordable Housing	£1,414,500.00	£1,400,355.00	£14,145.00	Upon implementation of the development
Local, Training, Skills and Job Brokerage	£848,700.00	£840,213.00	£8,487.00	Upon implementation of the development

Carbon Offset Contribution (as designed) Not indexed	£261,915.00	£261,915.00	£0	Upon completion of the development
Security Measures Contribution (Eastern City Cluster)	£282,900.00	£280,071.00	£2,829.00	Upon implementation of the development
S106 Monitoring Charge	£5,500.00	£0	£5,500.00	Upon commencement of the development
Total liability in accordance with the City of London's policies	£2,813,515.00	£2,782,554.00	£30,961.00	

- Local Procurement Strategy – Demolition and Construction Phases
- Employment and Skills Plan
  - Demolition Employment and Skills Plan (to be submitted to the City no later than six weeks prior to first preparatory operations)
  - Construction Employment and Skills Plan (to be submitted to the City no later than six weeks prior implementation of the development)
- Delivery and Servicing Plan – to include but not limited to the following provisions:
  - No servicing outside the hours of 23:00 – 07:00 on Tuesdays, Wednesdays, Thursdays, Fridays and Saturdays
  - No servicing outside the hours of 21:00 – 07:00 on Sundays and Mondays
  - All servicing to be undertaken within the public hall
  - A restriction of vehicles no heavier than 7.5 tonnes and no larger than 8 metres in length permitted to service the site, with cargo bikes to be used whenever possible
  - A requirement for all deliveries using goods vehicles to use a pre-booking system
  - A restriction of no more than 22 two-way trips per day by goods vehicles
  - Details of the goods vehicle servicing booking system
  - Submission no later than six months prior to anticipated occupation

- Travel Plan (to incorporate a Cycling Promotion Plan including guidance to promote responsible cycling)
    - Submission no later than six months prior to anticipated occupation
- Construction Monitoring Contribution
    - £53,820 for the first year of construction, due upon commencement of the development
    - £46,460 for each subsequent year of construction, due on each anniversary of commencement until practical completion
- 'Be Seen' Energy Performance Monitoring Submissions
- Utility Connection Requirements
- TfL Section Agreement
- Carbon Off-Setting Document Submissions
- Provision of Viewing Deck, to include but not limited to the following provisions:
    - Provision of the Viewing Deck no later than upon occupation of the development
    - Submission of Viewing Deck Management Plan no later than six months prior to occupation
    - Free of charge daily public access to the whole of the Viewing Deck 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 any area on the viewing deck between the hours of 10:00 and 19:00 or nautical dusk, whichever is later
    - All necessary and reasonable costs relating to fit-out and landscaping covered
    - Provision of the viewing deck for the lifetime of the development
    - Review of the Viewing Deck Management Plan for the first five years post-occupation and upon request of the City of London Corporation each year thereafter
- Provision of Archaeological Exhibition Space and submission of Archaeological Exhibition Space Management Plan, to include but not limited to the following provisions:
    - Provision of the Archaeological Exhibition Space no later than upon occupation.

- Submission of Archaeological Exhibition Space Management Plan no later than six months prior to occupation
- Free of charge daily public admission (including for restricted free of charge public events in the bookable area which may require booking for public groups such as school trips) to the exhibition space between the hours of 10:00 to 17:30 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 Archaeological Exhibition Space between the hours of 10:00 to 17:30
- All necessary and reasonable costs relating to full fit-out covered
- Details of the curation process for the space
- Provision of Archaeological Exhibition Space for the lifetime of the development
- Review of the Archaeological Management Plan for the first five years post-occupation and upon request of the City of London Corporation each year thereafter, including case studies and visitor numbers.

- Bull's Head Passage Residential Construction Impact Fund (up to £20,600, indexed, with provision to increase by up to 25% if required)
- Provision of Business Innovation Space
- TFL Cycle Infrastructure Contribution (£90,000.00, indexed)
- Provision of Public Route and Hall, to include
  - Specification
  - Public Hall and Route Access and Management Plan
  - Public access available 24 hours a day seven days a week (save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out, servicing or other structural or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship)
- Television Interference Survey
  - First Television Interference Survey to be carried out no later than three months prior to commencement
  - Second Television Interference Survey to be carried out no later than three months post completion of the development
- Wind Audit (if requested within five years past completion of the development)

- Solar Glare Assessment (if requested within five years past completion of the development)

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

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

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

848. 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. The absence of a blue badge parking space is considered acceptable in this circumstance given the unique site constraints the building faces as described throughout the report above, and the accessibility and inclusivity sections of this report and transport sections of this report address this matter further. 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.

849. 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

850. It is unlawful for the City, as public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).

851. Insofar as the grant of planning permission would result in interference with right to private and family life (Article 8 of the ECHR), particularly regarding residential amenity of neighbouring properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme, and therefore necessary in the interests of the economic well-being of the country. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policies DM10.7 and DM15.7 and emerging City Plan 2040 Policies DE7, HS3 and HL3.

852. Insofar as the grant of planning permission would result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

Conclusions and Overall Planning Balance

853. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies including the NPPF and guidance, SPDs and SPGs and relevant advice, 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.

854. The application relates to a site located at the northern end of Gracechurch Street, bounded by Gracechurch Street to the west, the New Moon Public House to the north, Bulls Head Passage to the south, and Leadenhall Market to the north and east. The site is located within the Leadenhall Market Conservation Area, and there are a number of other designated heritage assets in the surrounding area, including Leadenhall Market

itself (Grade II*), St Michael Cornhill (Grade I), St Peter Upon Cornhill (grade I), Lloyds Building (grade I), Nos. 12 & 14-19 Leadenhall Street (grade II), Nos. 81-82 Gracechurch Street (Grade II), Former Ship Tavern, Lime Street (Grade II), Nos. 7-9 Gracechurch Street (Grade II), and the Tower of London World Heritage Site.

855. The proposal is for the demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. The development has a maximum height of 147.9m above ordnance datum (AOD) and would be 31 storeys high inclusive of plant levels.

856. An associated listed building consent application (25/00548/LBC) has submitted for partial demolition and reconstruction works to the party walls between 83-87 Gracechurch Street, 81-82 Gracechurch Street, and Leadenhall Market, stabilisation of retained sections and integration of the party wall to the proposed Development at 83-87 Gracechurch Street, currently under consideration.

857. Objections have been received from statutory consultees including Historic England and the CAAC in relation to the overall scale and height of the proposed development, which they consider would cause harm to the Grade II* Leadenhall Market, Leadenhall Market Conservation Area, Bank Conservation Area, St Michael's Church Cornhill and the Chapel of St Peter ad Vincula. Historic England have also found low level less than substantial harm to the Tower of London World Heritage Site and referred to harm 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. They have however noted that the harm would be less than the consented scheme.

858. 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.

859. The proposal provides a significant increase in office floorspace – an uplift of c. 24,000 sqm delivering approximately 1.5% 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 between 1,700 and 2,205 full-time equivalent (FTA) jobs, an uplift of 1,260 to 1,630 FTE jobs. Additionally, the lower floors are designed to be capable of being taken up by SME or flexible working operators while the upper floors provide larger more regular floor plates suitable for a range of office occupiers.

860. Architecturally, the proposal strikes the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. 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 CoL and wider CAZ.

861. The plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some conflict has been found with some heritage assets (addressed in detail within this report), it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies.

862. The proposal to preserve the remains of the Forum-Basilica in-situ, conserve them and reveal them to public view within the new exhibition space would be a unique and significant benefit of the scheme. Conditions are recommended concerning investigation, excavation, evaluation, preservation, basement and foundation design, public engagement, and a management plan. A Visitor Management Plan and Cultural Strategy would also be secured via s106 obligation. 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.

863. A low level of less than substantial harm is also found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I).

864. The proposal would optimise the use of land, delivering high quality office space, and a substantial proportion of publicly accessible space which includes public access and exhibition of what is a nationally significant archaeological find in the Roman forum-basilica remains. The proposals would constitute thoroughly Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

865. A carbon options study has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability and avoiding demolition. It concludes that the intended transformation of the site, including making the recently discovered archaeological remains of the Roman basilica publicly accessible, providing highest quality floorspaces with high amenity and wellbeing values and climate resilient design, along with a range of urban greening measures and benefits relating to the activation and diversification of the local area, can only be fully delivered by a redevelopment on this site, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

866. The proposed development would reach close to the GLA's Standard Benchmark for life-cycle embodied carbon. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for recycling and reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in 18% carbon emissions beyond the Part L baseline, and an estimated low energy use intensity (EUI), as well as targeting a BREEAM "outstanding" rating. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the potential performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, and it cannot avoid demolition in accordance with Policy CS15(3), it complies with (taking account of the mitigation measures proposed) London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies

with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

867. In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Cycle parking and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. A lower quantum of cycle parking than is required by development plan policy has been accepted in this instance given the unique nature of the site, where tall buildings would typically by serviced via extensive basements which are limited in the context of the need to preserve and exhibit the nationally significant archaeological finds at the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistics guidance. The building is proposed to be serviced overnight using the Public Hall, with details of the delivery and servicing secured by planning obligation. It is considered at this stage that the proposed servicing arrangement would be acceptable.

868. In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed and are considered acceptable subject to mitigation, conditions and planning obligations where relevant. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant.

869. Any potential impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

870. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

871. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design (including London Plan tall building policy D9), culture, environmental and public realm related policies, as well as relevant policies related to sustainability and including Policy CS15 as a whole (while noting that demolition cannot be avoided in accordance with Policy CS15(3)).

872. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, and public realm would be complied with that notwithstanding the conflict with CS12 (Historic Environment), DM12.1 (Managing Change affecting all heritage assets and spaces), DM12.2 (Development in Conservation Areas), DM16.3 (Cycle Parking) and London Plan Policy T5 (Cycle Parking), and CS15 (Sustainable Development and Climate Change) clause (3) ; Emerging City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets), AT3 (Cycle Parking) and London Plan HC1 (Heritage Conservation and Growth), the proposals comply with the development plan when considered as a whole.

873. Other than the significant effect that the proposal will have to advance Local Plan Strategic Objective 1 to maintain the City's position as the world's leading international financial and business centre by providing c. 34,000 sq.m (GIA) of sustainable Grade A office floorspace, there are other benefits that would weight in favour of the proposed development when assessed against the local and national planning policies, as set out below:

- Securing a strategic high-quality mixed-use development within the City, that would provide land uses which support the diversification, vitality and growth of the City which contributes to the Destination City objectives;

- Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste;
- Delivering a proposal which would build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness;
- Reinstating an east-west route through the site, increasing permeability, appropriately and effectively improving links to Gracechurch Street and Leadenhall Market;
- The provision of a Public Hall, envisioned as an extension to Leadenhall Market, providing a flexible mixed-use space achieving laudable activity which aspires to foster movement, socialising and public engagement;
- The provision of a Heritage Walkway at fifth floor level, offering public views over the rooftops of Leadenhall Market, the Grade I-listed Lloyd's of London, and the surrounding Conservation Area;
- The preservation of the natioanlly significant archaeological find of London's first Roman forum-basilica, in-situ;
- A public, immersive and engaging exhibition of these remains; and
- Wider improvements to the public realm on Gracechurch Street.

874. As noted above less than substantial harm has been found to a number of heritage assets. Giving considerable importance and weight to the statutory duties in Section 66 and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990, including the desirability of preserving the significance of listed buildings, it is considered that this harm would be outweighed by the heritage and public benefits of the scheme. The public benefits include the delivery of commercial growth in a highly sustainable location, the retention of the nationally significant remains of the first Roman forum-basilica in London and its subsequent opening to the public through an exhibition space, alongside the new Public Hall and Heritage Walkway at fifth floor level, all resulting in a compelling and unique cultural offer. Additionally, the proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality, particularly at Leadenhall Market nearby. As discussed above, the paragraph 215 NPPF heritage balance is considered in this instance to be struck in favour of the scheme as the public benefits outweigh the less that substantial harm identified.

875. The scheme would provide benefits through 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 S.106 agreement. The previous planning permission granted in October 2023 for a tall building on the site, is also a material consideration which weighs in favour of granting planning permission.

876. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

877. 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

- Landscaping Design and Access Statement (27th March 2025)
- Design and Access Statement (27th March 2025)
- MOLA Cultural Plan (27th March 2025)
- Environmental Statement Non-Technical Summary (27th March 2025)
- Environmental Statement Volume 1 (27th March 2025)
- Environmental Statement Volume 2 (27th March 2025)
- Environmental Statement Volume 3 (27th March 2025)
- Heritage Townscape and Visual Impact Assessment (27th March 2025)
- Ventilation and Extraction Statement (27th March 2025)
- Infrastructure and Utilities Statement (27th March 2025)
- Planning Statement (27th March 2025)
- Detailed Circular Economy Statement (27th March 2025)
- Whole-Life Cycle Optioneering Report (27th March 2025)
- Whole-Life Cycle Optioneering Spreasheet (27th March 2025)
- Whole-life Cycle Carbon Assessment (27th March 2025)
- GLA Circular Economy Spreadsheet (27th March 2025)
- GLA Be Seen Spreadsheet (27th March 2025)
- GLA Carbon Emission Spreadsheet (27th March 2025)

- WLCA Spreadsheet (27th March 2025)
- Transport Assessment(27th March 2025)
- Cycling Promotion Plan (27th March 2025)
- Equality Statement (27th March 2025)
- Flood Risk and Drainage Assessment (16th May 2025)
- Phase 2 Contaminated Land Assessment (27th March 2025)
- Geotechnical Geo-Environmental Deskt Study (27th March 2025)
- Fire Strategy (27th March 2025)
- Statement of Community Involvement (27th March 2025)
- Arcaheological Desk-Based Assessment (27th March 2025)
- Health Impact Assessment (27th March 2025)
- Ecological Assessment (27th March 2025)
- BREEAM Ecological Appraisal (27th March 2025)
- Outdoor Thermal Comfort Assessment (27th March 2025)
- Economic Statement (27th March 2025)
- Construction Environmental Management Plan (27th March 2025)
- Workplace Travel Plan (27th March 2025)
- Delivery, Servicing and Waste Management Plan (27th March 2025)
- Constructions Logistics Plan (28th March 2025)

Representations – Members of the Public

14/05/2025	Will Ryan
03/06/2025	Dr Chris Blatchley
16/06/2025	Dr Chris Blatchley

Representations/Consultation Responses

16/04/2025	Heathrow Airport Ltd.
17/04/2025	London City Airport
17/04/2025	NATS Safeguarding
22/04/2025	Natural England
22/04/2025	Natural England
28/04/2025	Environment Agency
28/04/2025	London Borough of Tower Hamlets
02/05/2025	Historic England

02/05/2025	Transport For London
02/05/2025	Historic England
05/05/2025	City of London Conservation Area Advisory Committee
06/05/2025	Thames Water
06/05/2025	Thames Water
07/05/2025	London Borough of Camden
12/05/2025	Southwark Council
16/05/2025	Surveyor To The Fabric - St Paul's Cathedral
19/05/2025	Royal Borough of Greenwich
05/06/2025	Westminster City Council
05/06/2025	Thames Water
11/06/2025	London Museum
12/06/2025	Transport For London
13/06/2025	City of London Archaeological Trust
23/06/2025	Greater London Authority

APPENDIX A – Reasoned Conclusions on Significant Effects

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The 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, flexible retail space, a Public Hall, and cultural uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to 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:

1. The development shall provide (all figures GIA excluding plant):
   - Office (Class E(g)(i)) – 34,771sq.m
   - Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 344sq.m
   - Public Hall (Sui Generis) – 596sq.m
   - Cultural Exhibition, Basement Level (Sui Generis) – 478sq.m
   - Public Cultural Space, Level 05 (Sui Generis) – 136sq.m

   REASON: To ensure the development is carried out in accordance with the approved plans.

2. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant), or for use as a drinking establishment, or for use as a hot food takeaway, and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order

1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.

3. The areas within the development marked as cultural floorspace at basement level, and at level 05, as well as the Public Hall, as indicated on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

   REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11. The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and 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 - Policies

Relevant London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views

• Policy HC4 London View Management Framework

• Policy HC5 Supporting London’s culture and creative industries

• Policy G5 Urban Greening

• Policy G6 Biodiversity and access to nature

• Policy SI1 Improving air quality

• Policy SI2 Minimising greenhouse gas emissions

• Policy SI4 Managing heat risk

• Policy SI5 Water Infrastructure

• Policy SI7 Reducing waste and supporting the circular economy

• Policy SI 8 Waste capacity and net waste self-sufficiency

• Policy SL13 Sustainable drainage

• Policy T1 Strategic approach to transport

• Policy T2 Healthy Streets

• Policy T3 Transport capacity, connectivity and safeguarding

• Policy T4 Assessing and mitigating transport impacts

• Policy T5 Cycling

Relevant GLA Supplementary Planning Guidance (SPG):

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

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

• All London Green Grid SPG (March 2012);

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

• Sustainable Transport, Walking and Cycling LPG (November 2022)

• Sustainable Design and Construction SPG (September 2014);

• Social Infrastructure (May 2015);

• Culture and Night-Time Economy SPG (November 2017);

• London Environment Strategy (May 2018);

• London View Management Framework SPG (March 2012);

• London World Heritage Sites SPG (March 2012);

• Social Infrastructure SPG (May 2015);

- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

Emerging City Plan 2040

- Strategic Policy S1: Health and Inclusive City
- Policy HL1: Inclusive buildings and spaces
- Policy HL2: Air quality
- Policy HL3: Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5: Location and protection of social and community facilities
- Policy HL6: Public Toilets
- Policy HL7: Sport and Recreation
- Policy HL8 Play areas and facilities
- Policy HL9: Health Impact Assessment (HIA)
- Strategic Policy S2: Safe and Secure City
- Policy SA1: Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3: Designing in Security
- Strategic Policy S3: Housing
- Policy HS3: Residential Environment
- Strategic Policy S4: Offices
- Policy OF1: Office Development
- Policy OF2: Protection of Existing Office Floorspace

- Policy OF3 Temporary ‘Meanwhile’ Uses
- Strategic Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy RE3 Specialist Retail Uses and Clusters
- Strategic Policy S6: Culture and Visitors
- Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Policy N1 Infrastructure Provision and Connection
- Policy IN1: Infrastructure Capacity
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5: Shopfronts
- Policy DE6: Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Policy VT5: Aviation Landing Facilities
- Strategic Policy S10: Active Travel and Healthy Streets
- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking

- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Policy HE3: Setting of the Tower of London World Heritage Site
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017

- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

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

CS4 Planning contributions

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

CS10 Design

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

CS11 Visitor, arts and culture

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

CS12 Historic environment

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

CS13 Protected views

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

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.

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:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) 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:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.2 Security measures

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

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;
c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

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

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

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;
b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises,

customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and

their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

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

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.
2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

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

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

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

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 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:

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

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in

the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

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

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land and water quality

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

DM16.1 Transport impacts of development

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

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

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

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

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

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

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

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

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

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

DM17.1 Provision for waste

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

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

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:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

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

Policy 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 – Conditions and Informatives

CONDITIONS

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

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

2 (a) Prior to demolition of the development: full details of the pre- demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

(b) Prior to commencement of the development, excluding demolition: a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages reuse and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

3 Prior to the commencement of Phase 1 of the development, a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON: To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM
17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

4 Prior to the commencement of Phase 1 of the development, a Leadenhall Market Plant Rationalisation Study must be submitted and approved in writing by the local planning authority. It must set out:

a. The steps taken to engage with Leadenhall Market regarding potential plant rationalisation within an enclosure attached to the north elevation of 85 Gracechurch as shown as safeguarded on drawing ref P3200 Rev. 5.

b. If applicable, a detailed design of the plant enclosure for approval.

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, DMI0.1, DMI0.5, DM12.2.

5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DMl0.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

6 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.

7 No cranes shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.

REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace

8 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.

9 Prior to the commencement of Phase 1 of the development, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate

measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

10 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

11 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.

12 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.

13 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.

14 Prior to the commencement of Phase 1 of the development, the detailed design of all wind mitigation measures will be 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.

15 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.

16 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.

17 The development shall incorporate such measures as are necessary within the site to resist structural damage and to protect the approved new public realm within the site, 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.

18 Prior to the commencement of Phase 1 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 including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; and
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

19 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 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

20 Prior to the commencement of Phase 1 of the development, details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. 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.

21 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DMl0.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

22 Prior to the commencement of Phase 1 of the development details of the structural design and reduction of embodied carbon emissions of the proposed superstructure shall be submitted to and approved in writing by the local planning authority.

REASON: To ensure whole life-cycle carbon emissions are further reduced in compliance with Policy SI 2 of the London Plan.

23 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 retail uses (Class E and sui generis) and any Class E (office) kitchens. 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 said use takes place and retained for the life of the building.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

24 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level

location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

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

25 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' 2nd Edition dated May 2022 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

26 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.

27 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 be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

28 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing 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.

29 No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement, to include details of material passports for the retained and proposed materials, shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

30 Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

REASON: In order to ensure that the generator does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

31 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

32 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall

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

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

33 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.

34 A post-construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or a minimum rating of 'Excellent' as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.

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

35 No later than 3 months after completion of the building to shell and core and prior to the development being occupied, the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment shall provide an update to the detailed Whole Life-Cycle Carbon Assessment submitted after RIBA Stage 4, including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance, unless otherwise agreed. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their entirety in line with the criteria set out in the latest GLA's WLC assessment guidance.

REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

36 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 399 long stay pedal cycle spaces, and a minimum of 43 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and

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

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

37 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DMI0.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24.

38 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.

REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: TS

39 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 24 showers and 266 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

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

40 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

41 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.

REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

42 Servicing of the premises shall only be carried out between the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings and 21:00-07:00 on Saturday, Sunday and Monday evenings. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

43 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 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.

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

44 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DMl0.8, DM16.2.

45 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DMl 7.1.

46 No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 190

47 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan 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: DMl0.1.

48 With the exception of the public terrace at Level 5, the terraces hereby permitted shall not be used or accessed between the hours of 22:00 (or nautical dusk, whichever is later) 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.

49 No live or recorded music shall be played on the level 5 terrace between the hours of 22:00 on one day and 08:00 on the following day.

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

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

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

51 Live or recorded music shall not be in excess of 65dBA at the Gracechurch Street or Lime Street Passage entrances and the edge of the terrace at level 5.

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

52 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: DMl0.1.

53 The development shall be carried out in accordance with the approved details within the Fire Strategy. Document titled: 85 Gracechurch Street Fire Statement dated 4th March 2025 by ARUP

REASON: To ensure that the development incorporates the necessary fire safety measures.

54 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:

Approved drawings: P-1100 Rev 03, P1100 Rev 03, P-1102 Rev 01, P-1200 Rev 03, P-1201 Rev 03, P-1202 Rev 03, P-1203 Rev 03, P-1204 Rev 03, P-1205 Rev 03, P-1206 Rev 03, P-1207 Rev 03, P-1208 Rev 03, P-1209 Rev 03, P-1210 Rev 03, P-1211 Rev 03, P-1212 Rev 03, P-1213 Rev 03, P-1214 Rev 03, P-1215 Rev 03, P-1216 Rev 03, P-1217 Rev 03, P-1218 Rev 03, P-1219 Rev 03, P-1220 Rev 03, P-1221 Rev 03, P-1300 Rev 03, P-1301 Rev 03, P-1302 Rev 03, P-1303 Rev 03, P-1304 Rev 03, P-1305 Rev 03, P-1306 Rev 03, P-1307 Rev 03, P-2200 Rev 03, P-2201 Rev 03, P-2202 Rev 03, P-2203 Rev 03, P-2204 Rev 03, P-2205 Rev 03, P-2206 Rev 03, P-2207 Rev 03, P-2208 Rev 03, P-2209 Rev 03, P-2210 Rev 03, P-2211 Rev 03, P-2212 Rev 03, P-2213 Rev 03, P-2214 Rev 03, P-2215 Rev 03, P-2216 Rev 03, P-2217 Rev 03, P-2218 Rev 03, P-2219 Rev 03, P-2220 Rev 03, P-2221 Rev 03, P-2222 Rev 03, P-2223 Rev 03, P-2224 Rev 03, P-2225 Rev 03, P-2226 Rev 03, P-2227 Rev 03, P-2228 Rev 03, P-2229 Rev 03, P-2230 Rev 03, P-2231 Rev 03, P-2232 Rev 03, P-2233 Rev 03 P-2234 Rev 03 P-2235 Rev 03, P-3200 Rev 03, P-3201 Rev 03, P-3202 Rev 03, P-3203 Rev 03, P-3204 Rev 03, P-3205 Rev 03, P-3206 Rev 03, P-3207 Rev 03, P-3208 Rev 03, P-3209 Rev 03, P-3400 Rev 03, P-3401 Rev 03, P-3402 Rev 03, P-3403 Rev 03, P-3404 Rev 03, P-3405 Rev 03, and P-3406 Rev 03.

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.

Access

55. Before any works thereby affected are begun, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, flexible uses, including cultural, retail, office and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.

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

56. Prior to the commencement of Phase 1 of the development, and notwithstanding the approved plans, details, including drawings at a scale of no less than 1:20, shall be submitted to and approved in writing by the local planning authority of:
    a) Wheelchair accessible and ambulant accessible toilet and baby changing facilities at basement level within the building hereby approved; and
    b) associated signage

The approved facilities shall be made available to the general public at all times of the operation of the building and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities

onsite, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development.

REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.

57. Before any works thereby affected are begun, details of all proposed internal lifts including the platform lift, shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

58. 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.

59. Before any works thereby affected are begun, the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
    a) Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;
    b) Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;

c) 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) Planting to level 05 public terrace and all office terraces including path widths and seating and demonstrating how unwelcome touch and scent can be avoided;
f) Irrespective of approved drawings landscaping details of spend areas for assistance animal;
g) Details of left and right hand transfer wheelchair accessible WC facilities in the new office building;
h) 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.

60. 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:

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):
d) Step-free entrance points and entrances and lift access
e) Sanitary provision including but not exclusively accessible toilets, ambulant toilets and baby changing facilities.
f) facilities for assistance animals
g) equipment loan
h) assistive listening system and other assistive technology
i) rest and recovery facilities/ quite room
j) room for reflection/prayer
k) plant species
l) Inclusive Entrances Strategy
m) Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering

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
g) 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.

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.

Design and Heritage

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

(a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;

(b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration;

(c) details of the rooftop including details of the sedum roof and plant enclosure;

(d) details of canopies;

(e) typical masonry details, including jointing and any necessary expansion/movement joints for all external and internal elevations ;

(f) details of ground and first floor elevations including all entrances, integrated seating, information boards;

(g) details of semi-internal elevations fronting the ground floor public routes;

(h) full details of the Heritage Walkway, including all elevations, flooring, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;

(i) full details of the Ground Floor Public Hall, including all elevations, flooring, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation, vehicle lifts, roller shutters and any infrastructure required to deliver programming and varied uses including any security infrastructure such as desks, scanners and queuing barriers;

(j) details of soffits, hand rails and balustrades, including those soffits in the Public areas of the ground floor, level 5 and museum;

(k) full details of the museum and learning spaces at basement including: elevations, seating, planters, walkover glazing specifying build-up, flooring, storage and reception areas, all built in display cases, screens and vitrines, lighting and feature stair detail design.

(k) details all party wall treatments;

(l) details of junctions with adjoining premises, including any new or reinstated chimney stacks or other roofline features to the Market;

(m) 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;

(n) details of all drainage, irrigation and rainwater harvesting;

(o) details of the integration of M&E and building services into the external envelope;

(p) details of the enclosure on the north elevation for Leadenhall Market plant equipment.

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, DMI0.1, DMI0.5, DM12.2. DM10.8

62. Before any works thereby affected are begun details of the proposed works to the rebuilt Gracechurch Street frontage including:

(i) methodology for its adaptation
(ii) details of the treatment of existing fenestration
(iii) details of the new fenestration including materiality, 1:10 detailed drawings indicating glazing specification, colour and reflectivity, glazing bars and casements
(iv) details of the enlargement of the main entrance portal including samples of stone selected
(v) details of any requisite cleaning and
(vi) repair works 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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a 241 satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2

63. Before any works thereby affected are begun, details of the proposed interpretation, content and displays of the Public Hall, Museum and the Heritage Walkway, including signage, to interpret and explain the Roman BasilicaForum, the archaeology and history of the site shall be submitted to and approved in writing by the Local Planning Authority demonstrating equitable and accessible design.

    REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.4 DM 10.8.

64. Before any works thereby affected are begun, details of all balustrades to external terrace areas, and associated risk assessment, including any other means necessary to mitigate the risk identified within the risk assessment, shall be submitted to and approved in writing by the Local Planning Authority and the balustrades shall be delivered as approved and retained for the life of the building, unless otherwise approved in writing.

    REASON: To ensure that the Local Planning Authority may be satisfied that there are appropriate safety measures in place in accordance with the guidance in the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) and the following policy of the Local Plan: CS3; and DM3.2.

65. Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.

    REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

66. Prior to the commencement of Phase 1 of the development, All unbuilt surfaces, including the podium, terraces, balconies, roof terrace and new public route and all trees, shall be treated by a landscaping scheme to be submitted to and approved by the Local Planning Authority, including details of:

    (a) Irrigation;

    (b) Provision for harvesting rainwater run-off from road to supplement irrigation;

(c) Spot heights for ground levels around planting pit;

(d) Soil;

(e) Planting pit size and construction;

(f) Tree guards; and

(g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.

All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DMI0.1, DM19.2.

67. Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for:

(a) the cascade of roof terraces and surfaces, to include green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
(b) the incorporation of blue roofs into roof surfaces; and
(c) the landscaping of the 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 and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

68. Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the

approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1.

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

a) lighting layout/s;
b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
c) a lighting control methodology;
d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
e) all external, semi-external and public-facing parts of the building 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; and
f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 , CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036.

70. Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local

Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

(a) A Signage strategy for the retail units within the development shall be submitted;
(b) A Signage strategy relating to the Heritage Walkway shall be submitted and this strategy shall make provision for clear signs to be placed in prominent positions on the development site, including signage indicating the access point for the publicly accessible free space and culture offer; and
(c) The signage relating to the Heritage Walkway and cultural space shall also be included within the overall strategy.

All signage relating to the public spaces including Hall and Walkway, Museum (as approved in the signage strategy) must be erected and in place on the development site prior to occupation of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DMl0.1, DMl0.5, DMl0.8, DM12.1, DM12.2 and DM15.7 .

Air Quality

71. Prior to the commencement of Phase 1 of the development, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. 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 an emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.

    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.

72. Prior to any plant 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 will comply with the City of London Air Quality Supplementary Planning Document and the methodology will be agreed with the LPA. It shall detail how the development will minimise emissions from any proposed plant, and exposure to air pollution during its operational phase. The mitigation detailed in the report shall thereafter be maintained in accordance with the approved assessment for the operational life of the building.

    REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

73. 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.

74. A revised air quality neutral assessment that considers the building and transport emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance and the methodology will be agreed with the LPA.

    REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

75. A revised air quality positive assessment that maximises the developments benefits to air quality must be submitted. The air quality positive assessment must follow the latest air quality positive guidance.

    REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan.

Environmental Health

76. 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.

Flooding/water

77. 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.

78. 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.

79. No development shall be occupied until confirmation has been provided that either:-

    1. Foul water Capacity exists off site to serve the development, or
    2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or
    3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

    Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

80. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

81. No development shall be occupied until confirmation has been provided that either:-

    1. Surface water capacity exists off site to serve the development or
    2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or

    3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

    Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

82. 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

83. Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.

    REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.

84. The development shall provide (all figures GIA excluding plant): REASON: To ensure the development is carried out in accordance with the approved plans.

    - Office (Class E(g)(i)) – 34,771sq.m
    - Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 344sq.m
    - Public Hall (Sui Generis) – 596sq.m

- Cultural Exhibition, Basement Level (Sui Generis) – 478sq.m
- Public Cultural Space, Level 05 (Sui Generis) – 136sq.m

REASON: To ensure the development is carried out in accordance with the approved plans.

85. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant), or for use as a drinking establishment, or for use as a hot food takeaway, and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

    REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.

86. The areas within the development marked as cultural floorspace at basement level, and at level 05, as well as the Public Hall, as indicated on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

87. The proposed development must be carried out in accordance with the approved phasing plan, setting out the phases of development as follows:

- Phase 0: Deconstruction and Archaeological Investigation
- Phase 1: 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.

88. No demolition other than above basement slab level 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. A programme of evaluation in the east of the site to be carried out before removal of the basement slab

B. Production of a programme of construction work which demonstrates how the archaeology to be retained will be managed and protected during the construction phase

C. The programme and methodology for the main site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

D. Procedure for assessing the significance of archaeological remains revealed and where appropriate establishing a strategy for their preservation.

E. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material, including consideration of their relationship to the forum-basilica as a whole and significance to understanding Londinium's development. 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: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

89. Prior to the commencement of the main archaeological site investigation details of an appropriate programme of public engagement with the site's archaeological and historical interest including a timetable shall be submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

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

90. Irrespective of the approved drawings, the final basement configuration would be submitted to and approved in writing with the Local Planning Authority in consultation with Historic England. This shall include details of the basement and foundation design and construction method to protect and where appropriate conserve, interpret and display archaeological remains in-situ. The development shall be carried out in accordance with the approved details.

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

INFORMATIVES

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

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

a full pre application advice service has been offered;

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

2 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.

- to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;

- aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;

- or where the procurement of goods and services is contracted out ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our `Guidance note for developers').

For additional details please refer to the City of London's `Local Procurement Charter' and `Local Procurement - Guidance Note for City Developers'. These documents can be found at

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning

Further guidance can be obtained by contacting the `City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

3 The Mayor of London has adopted a new charging schedule for Community

Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:
Office 185GBP per sq.m
Retail 165GBP per sq.m
Hotel 140GBP per sq.m
All other uses 80GBP per sq.m

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

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

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

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party

is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

4 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.

5 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.

6 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.

7 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.

8 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:

(a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.

(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure

the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).
You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Connections to the local sewerage and surface water system.

(g) Carriageway crossovers.

(h) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

9 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

(j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(k) The control of noise from plant and equipment;

(l) Methods of odour control.

10 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust (a)
The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work.
Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)
Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act l974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act l990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)
Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

Air Quality (e)
Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Boilers and CHP plant (f)
The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NOx emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)
All gas Combined Heat and Power plant should be low NOX technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)
When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread

use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)
Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators (j)
Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)
There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers (l)
Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Ventilation of Sewer Gases

(o)
The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities.
These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level

away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety (p)
Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)
If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

12 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

13 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.

14 The investigation and risk assessment referred to in condition 6 must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:
- human health,
- property (existing or proposed) including buildings, open spaces, service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

15 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification: London Fire Brigade, Fire Prevention Branch 5-6 City Forum
City Road
London EC1N 2NY

(b) Public houses, wine bars, etc.
City of London Corporation
Trading Standards and Veterinary Service PO Box 270
Guildhall
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)
London Fire Brigade, Petroleum Department 5-6 City Forum
City Road

London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:
Borough Integration and Partnerships Transport
for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(e) Works affecting a GLA road:
Borough Integration and Partnerships Transport
for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

16 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.

17 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.

18 Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

19 All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating and The City of London Corporation as Planning

Authority requests early discussion with the Applicant should it appear that the rating is likely to fall below outstanding.

20 As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

21 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.

22 Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all pilling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

23 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

24 Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The 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, flexible retail space, a Public Hall, and cultural uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to 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:

1. The development shall provide (all figures GIA excluding plant):
   - Office (Class E(g)(i)) – 34,771sq.m
   - Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 344sq.m
   - Public Hall (Sui Generis) – 596sq.m
   - Cultural Exhibition, Basement Level (Sui Generis) – 478sq.m
   - Public Cultural Space, Level 05 (Sui Generis) – 136sq.m

   REASON: To ensure the development is carried out in accordance with the approved plans.

2. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant), or for use as a drinking establishment, or for use as a hot food takeaway, and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.

3. The areas within the development marked as cultural floorspace at basement level, and at level 05, as well as the Public Hall, as indicated on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

   REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11. The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and Travel Plan including a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures as required. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions, and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions

Appendix B

Relevant London Plan Policies

• Policy CG1 Building Strong and Inclusive Communities

• Policy GG2 Making the best use of land

• Policy CG3 Creating a Healthy City

• Policy GG5 Growing a good economy

• Policy CG6 Increasing efficiency and resilience

• Policy SD4 The Central Activities Zone (CAZ)

• Policy SD5 Offices, and other strategic functions and residential development in the CAZ

• Policy D1 London's form, character and capacity for growth

• Policy D2 Infrastructure requirements for sustainable densities

• Policy D3 Optimising site capacity through the design-led approach

• Policy D4 Delivering Good Design

• Policy D5 Inclusive Design

• Policy D8 Public realm

• Policy D9 Tall buildings

• Policy D11 Safety, security and resilience to emergency

• Policy D12 Fire Safety

• Policy D14 Noise

• Policy S6 Public toilets

• Policy E1 Offices

• Policy E2 Providing suitable business space

• Policy E3 Affordable Workspace

• Policy E9 Retail, markets and hot food takeaways

• Policy E10 Visitor infrastructure

• Policy E11 Skills and opportunities for all

• Policy HC1 Heritage conservation and growth

• Policy HC2 World Heritage Sites

• Policy HC3 Strategic and Local Views

• Policy HC4 London View Management Framework

• Policy HC5 Supporting London's culture and creative industries

• Policy G5 Urban Greening

• Policy G6 Biodiversity and access to nature

• Policy SI1 Improving air quality

• Policy SI2 Minimising greenhouse gas emissions

• Policy SI4 Managing heat risk

• Policy SI5 Water Infrastructure

• Policy SI7 Reducing waste and supporting the circular economy

• Policy SI 8 Waste capacity and net waste self-sufficiency

• Policy SL13 Sustainable drainage

• Policy T1 Strategic approach to transport

• Policy T2 Healthy Streets

• Policy T3 Transport capacity, connectivity and safeguarding

• Policy T4 Assessing and mitigating transport impacts

• Policy T5 Cycling

Relevant GLA Supplementary Planning Guidance (SPG):

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

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

• All London Green Grid SPG (March 2012);

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

• Sustainable Transport, Walking and Cycling LPG (November 2022)

• Sustainable Design and Construction SPG (September 2014);

• Social Infrastructure (May 2015);

• Culture and Night-Time Economy SPG (November 2017);

• London Environment Strategy (May 2018);

• London View Management Framework SPG (March 2012);

• London World Heritage Sites SPG (March 2012);

- Social Infrastructure SPG (May 2015);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

Emerging City Plan 2040

- Strategic Policy S1: Health and Inclusive City
- Policy HL1: Inclusive buildings and spaces
- Policy HL2: Air quality
- Policy HL3: Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5: Location and protection of social and community facilities
- Policy HL6: Public Toilets
- Policy HL7: Sport and Recreation
- Policy HL8 Play areas and facilities
- Policy HL9: Health Impact Assessment (HIA)
- Strategic Policy S2: Safe and Secure City
- Policy SA1: Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3: Designing in Security
- Strategic Policy S3: Housing
- Policy HS3: Residential Environment
- Strategic Policy S4: Offices
- Policy OF1: Office Development

- Policy OF2: Protection of Existing Office Floorspace
- Policy OF3 Temporary ‘Meanwhile’ Uses
- Strategic Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy RE3 Specialist Retail Uses and Clusters
- Strategic Policy S6: Culture and Visitors
- Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Policy N1 Infrastructure Provision and Connection
- Policy IN1: Infrastructure Capacity
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5: Shopfronts
- Policy DE6: Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Policy VT5: Aviation Landing Facilities
- Strategic Policy S10: Active Travel and Healthy Streets
- Policy AT1: Pedestrian Movement, Permeability and Wayfinding

- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking
- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Policy HE3: Setting of the Tower of London World Heritage Site
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017

• Archaeology in the City PAN,

• Air Quality SPD, July 2017

• Archaeology and Development Guidance SPD, July 2017

• Freight and Servicing SPD February 2018

• City Public Realm SPD (CoL, July 2016);

• Office Use SPD, January 2015

• Open Space Strategy SPD, January 2015

• Tree Strategy SPD May 2012

• Planning Obligations SPD 2021

• Protected Views SPD, January 2012

• City Transport Strategy (November 2018 – draft);

• City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

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

CS4 Planning contributions

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

CS10 Design

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

CS11 Visitor, arts and culture

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

CS12 Historic environment

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

CS13 Protected views

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

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.

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:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) 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:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.2 Security measures

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

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;

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

DM3.3 Crowded places

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

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

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;

b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to

maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

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

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.
2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

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

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

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

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 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:

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

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

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

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining

carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land and water quality

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

DM16.1 Transport impacts of development

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

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

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

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

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

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

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

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

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

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

DM17.1 Provision for waste

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

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

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:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same

development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

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

Policy 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.

Memo

To Department of Planning & Transportation

From Paul Jones
City Operations Division
Environment Department
Telephone [redacted]
Email [redacted]

Date 15 April 2025

Subject GREASE TRAP REQUIREMENT

For action

Application – PT_KC/25/00433/FULEIA

Address: (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street, London EC3V 0AA

Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;

ANY BUILDING PROPOSAL WHICH INCLUDES CATERING FACILITIES WILL BE REQUIRED TO BE CONSTRUCTED WITH ADEQUATE GREASE TRAPS TO THE SATISFACTION OF THAMES WATER UTILITIES LTD OR THEIR CONTRACTORS.

I would be obliged if you could incorporate this in your response to the planning department, regarding this application.

Paul Jones

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 17 April 2025
Our Ref DS/FS25/0019
Your Ref PT_KC /25/00433/FULEIA
Subject (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA

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.

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Ms Hazel Austin
Environmental Health Officer
Environment Department
Telephone [redacted]
Email [redacted]

Date 24 April 2025
Our Ref 25/02778/NPLN
Your Ref PT_KC /25/00433/FULEIA

Subject (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA

Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

This department acknowledges receipt for the above application and have the following comments and observations to make:

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.

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.

Fume extract arrangements:
Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A/E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

Ventilation and 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’ 2nd Edition dated May 2022 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

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

Noise from plant:
(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.

Noise and vibration from mechanical systems or other plant:
Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

Commercial Kitchen Drainage:

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.

Internal noise levels:
All residential premises in the development shall be designed and constructed to attain the following internal noise levels:
Bedrooms- 35dB LAeq (07:00-23:00) , 30dB LAeq,T* and 45dB LAmax not to be exceeded more than 10 times per night), *T- Night-time 8 hours between 23:00-07:00
Living rooms- 35dB LAeq, T* , *T- daytime 16 hours between 07:00-23:00.
A report detailing the sound insulation properties of the building envelope shall be provided and shall include the specification and acoustic data sheets for glazed areas of the development and any complementary acoustic ventilation scheme. Where external noise levels exceed WHO guidelines then provision of acoustic ventilation will need to be considered. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any relevant part of the building.

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: To ensure internal noise standards are met, external noise levels should be determined over a period of time when it would be anticipated that ambient noise levels are likely to be at their highest. A minimum measurement period of 3 days is recommended and should preferably include weekdays and weekend. If I minute measurements of the Lamax are not practical then the 15 minute measurements should be corrected by +2dB to more accurately reflect potential impacts. Post completion testing should be carried out when it would be anticipated that ambient noise levels are likely to be at their highest.

Noise from use Class E / Sui Generis affecting offices / non offices:
The proposed Class E / Sui Generis development sharing a party element with office / non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the existing neighbouring premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

Full Lighting Strategy submission:
Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

Contaminated Land:
Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):
a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the

Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Roof Terrace / Viewing platform Hours:
The viewing platform level 5, balconies, terraces and roof terrace throughout 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.

Hours of servicing:
No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

No music audible outside the premises:
No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Roof Terrace Music:
No amplified or other music shall be played on the roof terraces, balconies or the viewing platform.
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.

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

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

Sewer Vent Condition:
Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

Environment Department
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: [redacted]

[redacted]

-----Original Message-----
From: Verma, Vimal <[redacted]
Sent: 11 May 2025 22:29
To: McCallum, Kieran <[redacted]
Cc: Turner, Lee <[redacted]
Subject: 25/00431/FULEIA - site Known As 85 Gracechurch Street

Hi Kieran,

The proposed waste storage and collection facilities indicated on Drawings No. P-2201 Rev 3 and P2203 Rev 3 and as outlined in the Delivery, Servicing and Waste Management Plan, March 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: 14 April 2025 16:05
To: Verma, Vimal <[redacted], Turner, Lee <[redacted]
Subject: Planning Application Consultation: 25/00431/FULEIA

Dear Sir/Madam

Please see attached consultation for (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Kieran McCallum
Environment Department
City of London

Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Kyri Eleftheriou-Vaus
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 19/06/2025
Your Ref: 25/00433/FULEIA

Subject: 83 - 87 Gracechurch Street, London, EC3V 0AA

Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

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. The site has an existing consent in place through the application reference 22/0115/FULEIA and this application is a re-designed proposal of the consented scheme. The proposal is for the demolition of the existing building with a mixed use, office led, 31 storeys plus ground building.

The proposed development is 'car free' and does not have any car parking spaces. A Delivery Servicing and Waste Management Plan has been submitted which predicts 80 delivery/service vehicles per day. Through consolidation this is assessed to be reduced by at least 50% resulting in an increase of 20-23 vehicle trips per day compared to the existing site.

There are four backup generators proposed, three for life-safety purposes and one 440kW generator proposed for future tenant/business continuity use. The impacts of these were assessed within the submission for the consented scheme and have not been re-assessed even though there have been several design changes and model variables since the 2022 submission. It has been noted that the flue location has changed for all combustion sources and within the assessment under the consented scheme there is no inclusion of a power outage scenario. It is not clear whether the hours of usage provided is solely for testing, and two of the generators are stated as to be operation for greater than 50 hours per year.

The Air Quality Neutral Assessment submitted assesses the development as being air quality neutral, as per GLA guidance. In terms of transport emissions the development is 'car-free' therefore an assessment is not required. It should be noted that as per GLA guidance emissions from service and delivery vehicles are excluded from the assessment. In terms of building

emissions it has been stated that all proposed combustion based backup plant proposed for the development can be excluded from the assessment. As stated above there is plant proposed for business continuity usage and plant predicted to operate for more than 50 years per year. These variables should be included within the assessment therefore a condition has been recommended for a revised assessment to be completed.

The Air Quality Positive Statement submitted was generic and did not include any measures that were not already required through local or London Plan policy or any 'innovation or future proofing' measures. A revised document will be required to ensure that measures to improve the local air quality environment are maximised and that the development pushes beyond compliance.

A number of queries have been raised with the applicant regarding the suitability and accuracy of the air quality assessment documents. Therefore, a number of conditions have been recommended for which the assessment methodology will need to be agreed with the Air Quality Team.

Should the development be approved please attach the following conditions:

Condition M28C amended / Emergency Power Supply

Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. 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 an emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.

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.

Condition M26F

Prior to any plant 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 will comply with the City of London Air Quality Supplementary Planning Document and the methodology will be agreed with the LPA. It shall detail how the development will minimise emissions from any proposed plant, and exposure to air pollution during its operational phase. The mitigation detailed in the report shall thereafter be maintained in accordance with the approved assessment for the operational life of the building.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

Condition 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.

Air Quality Neutral Assessment
A revised air quality neutral assessment that considers the building and transport emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance and the methodology will be agreed with the LPA.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Air Quality Positive Assessment
A revised air quality positive assessment that maximises the developments benefits to air quality must be submitted. The air quality positive assessment must follow the latest air quality positive guidance.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason

To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.
In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

From: [redacted]
To: [redacted]
Subject: Re: Planning Application Consultation: 25/00433/FULEIA
Date: 14 April 2025 08:37:45
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-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]
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: 14 April 2025 16:06
To: ED - Airport Safeguarding/BAA - [redacted]
Subject: Planning Application Consultation: 25/00433/FULEIA

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Dear Sir/Madam

Please see attached consultation for (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kieran McCallum
Environment Department
City of London

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LPA Ref: 25/00433/FULEIA

London City Airport Ref: 2025/LCY/110

Date: 17/04/2025

Dear Kieran McCallum,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's safeguarding criteria.

LPA Reference	25/00433/FULEIA
Proposal	Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.
Location	83 - 87 Gracechurch Street London EC3V 0AA
Borough	City of London
Case Officer	Kieran McCallum

We would also like to take this opportunity to make you aware of the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

where a 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

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.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com.

Kind regards,

Lucy Dale
On behalf of London City Airport

From: [redacted]
To:
Subject: RE: [EXTERNAL] Planning Application Consultation: 25/00433/FULEIA [SG33687]
Date: 17 April 2025 11:56:25
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG33687

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: [redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 14 April 2025 16:07
To: NATS Safeguarding <[redacted]
Subject: [EXTERNAL] Planning Application Consultation: 25/00433/FULEIA

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Dear Sir/Madam

Please see attached consultation for (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kieran McCallum
Environment Department
City of London
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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

Date: 22 April 2025
Our ref: 510191
Your ref: 23/01718/FUL

City of London
PLNComments@cityoflondon.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works
Location: : (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V0AA

Thank you for your consultation on the above dated 14 April 2025 which was received by Natural England on 14 April 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,

Beemal Brahmbhatt
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).

Date: 22 April 2025
Our ref: 510191
Your ref: 25/00433/FULEIA

City of London
PLNComments@cityoflondon.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works
Location: : (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V0AA

Thank you for your consultation on the above dated 14 April 2025 which was received by Natural England on 14 April 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,

Beemal Brahmbhatt
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.

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Annex A – Natural England general advice

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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).

creating a better place
for people and wildlife

Environment Agency

Kieran McCallum
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/138076/01
Your ref: 25/00433/FULEIA

Date: 28 April 2025

Dear Kieran

83 - 87 Gracechurch Street London EC3V 0AA.

Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

Thank you for consulting us on the above application on 14 April, 2025.

Environment Agency Position

Whilst we have **no objections** to this application, we would like to draw your and the applicant's attention to the following advisory comments.

Advice to Local Planning Authority

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in

improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. ‘major’ developments) should achieve the BREEAM ‘excellent’ standard for water consumption (category ‘WAT 01’), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

Development in close proximity to activity regulated by an Environment Agency permit advisory

The proposed development is located within 75m of Medium combustion plant (MCP) comprising of 3 small boilers and one standby generator. New developments within 75m metres of MCP could result in impacts including the nearby community being exposed fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 193 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Demitry Lyons
Sustainable Places Planning Advisor

Email: [redacted]
Telephone: [redacted]

Kieran McCallum
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/25/00704
Your ref: 25/00433/FULEIA

Enquiries to: Holly Ganderton
Tel:
Email: [redacted]

28 April, 2025

Dear Kieran McCallum,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	(site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA
Proposal	Observation requested by City of London for phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above applciation. I would be grateful if you would take the observations set out about into consideration:-

1. The LPA has no observations to make.

If you require any further information please contact the officer named at the top of this letter.

The best of London in one borough

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

Historic England

Mr Kieran McCallum
Environment Department
City of London
Guildhall
London EC2V 7HH

Your Ref: 25/00433/FULEIA
Our Ref: 231978

CContact: Helen Hawkins
[redacted]

01 May 2025

Dear Kieran,

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

83 - 87 Gracechurch Street London EC3V 0AA
Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. (site Known As 85 Gracechurch Street)

Recommend Archaeological Conditions

Thank you for your consultation received on 14 April 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.
Advice on non-archaeological heritage impacts are being provided by Historic England's Development Advice team in a separate letter.

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 desk-based assessment, Environmental Statement archaeology chapter and Cultural Plan accompanied the planning application. Archaeological evaluation was carried out for the site under the previous planning permission and work also took place on the site in the 1930s and 1990s. Therefore there is a good understanding of likely archaeological survival on the site which has been explained very clearly in the desk-based assessment.

Previous work, particularly the most recent evaluation, has established that remains of the first Roman forum-basilica have a good survival on the site, below the current basement slab, although truncation is expected from the current and previous buildings. Remains of the second forum are also likely to be present. A wall belonging to a medieval building called the Garner is also likely to survive in some form on the site and remains of post-medieval date relating to the Spread Eagle Inn are expected. The first forum-basilica and second forum remains are recognised as being nationally important, although they are not designated as a Scheduled Monument as they are not yet fully understood and can be appropriately managed through the planning system.

Conditions attached to the previous planning permission established the principle of retaining the remains of the first forum-basilica within the new basement and the provision of an exhibition and display of the remains. The ES chapter identifies that the retention and display of the remains is a beneficial effect of the development, as is the proposed synthesis and re-examination of all the records previously produced for the forum-basilica. The retention and display focusses on the remains of the first forum as the second forum remains are likely to be more fragmentary and the second forum covered a much wider area.

GLAAS welcomes the applicant's aspirations to provide a world class visitor experience for the site and their redesign of the basement area to accommodate the preservation of the forum-basilica remains.

In order for the building to be constructed safely, some loss of archaeological material will be necessary so that the pile wall can be inserted around the remains, providing support to the deeper basements proposed to the east of the site away from the first forum-basilica and to the main building. The drawings showing this area of loss are provided in the desk-based

assessment. GLAAS understands that it will be very difficult to deviate from the submitted drawings during the new development, but full excavation of archaeological remains in these areas will be carried out. Full excavation of the second forum remains and any other archaeological remains of significance will be carried out in the east of the site where the basements will extend to a greater depth.

We expect that the long-term management of heritage spaces would be secured through a Section 106 agreement and would be happy to assist in its formulation.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

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

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

Recommendations

The development affects a heritage asset of equivalent significance to a scheduled monument, Londinium's Roman Forum, which has two major construction phases.

These are large assets of which only relatively small parts are affected but the first forum Tribunal is a key element of the asset so its loss would in our view have amounted to an unacceptably high level of harm. We are very pleased that this loss has been avoided and now consider the overall harm to be a moderate level of less than substantial harm.

In our view this residual harm would be largely offset by significant public benefits from revealing and interpreting the site's significance.

I recommend attaching conditions as follows:

Investigation

No demolition other than above basement slab level or development shall take place until a

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.

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. A programme of evaluation in the east of the site to be carried out before removal of the basement slab

B. Production of a programme of construction work which demonstrates how the archaeology to be retained will be managed and protected during the construction phase

C. The programme and methodology for the main site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

D. Procedure for assessing the significance of archaeological remains revealed and where appropriate establishing a strategy for their preservation.

E. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material, including consideration of their relationship to the forum-basilica as a whole and significance to understanding Londinium's development. 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.

Public Engagement

Prior to the commencement of the main archaeological site investigation details of an appropriate programme of public engagement with the site's archaeological and historical interest including a timetable shall be submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

Informative: Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

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.

Basement and Foundation Design

Irrespective of the approved drawings, the final basement configuration would be submitted to and approved in writing with the Local Planning Authority in consultation with Historic England. This shall include details of the basement and foundation design and construction method to protect and where appropriate conserve, interpret and display archaeological remains in-situ. The development shall be carried out in accordance with the approved details.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 218.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

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

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.

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.

Preservation

Where archaeological remains are to be preserved within a development there will normally be a requirement to provide details of how this will be achieved. Typically this would involve a design and methods statement for groundworks. Where particularly important or vulnerable features are to be preserved there may also be a requirement to monitor their condition and take remedial action in the event of decay.

Management Plan

Management Plans help pull together an understanding of significance to evidence the conservation and management of heritage assets. From this informed basis, plans are then used to develop programmes of repair, restoration or to draw up proposals for change. Management Plans should be structured to meet the needs of the specific property/site and designed to be used for every day reference by staff managing the site. Management Plans not only pull together and analyse the history of a site or landscape, they can also be an important record in their own right.

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

This response relates solely to archaeological considerations. Historic England's Development Advice Team will be responding separately.

Yours sincerely

Helen Hawkins

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

Sent: 02 May 2025 14:59
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: RE: Planning Application Consultation: 25/00433/FULEIA

THIS IS AN EXTERNAL EMAIL

FAO Kieran McCallum,

25/00433/FULEIA
Location: (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA
Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use
(Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application.

My colleagues in Spatial Planning will respond separately with comments, if any.

This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Mitigating risk - while helping London develop.

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, April 14, 2025 4:02 PM
To: Location Enquiries <[redacted]
Subject: Planning Application Consultation: 25/00433/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning

(Development Management Procedure) (England) Order 2015 for (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kieran McCallum
Environment Department
City of London
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Historic England

Mr Kieran McCallum
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN

[redacted]

Our ref: P01591363

2 May 2025

Dear Mr McCallum

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

(SITE KNOWN AS 85 GRACECHURCH STREET) 83 - 87 GRACECHURCH STREET LONDON EC3V 0AA
Application No. 25/00433/FULEIA

Thank you for your letter of 14 April 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. The Greater London Archaeological Advisory Service (GLAAS) will respond separately regarding the archaeological impacts of the proposals.

Summary

Historic England provided extensive advice on the consented scheme (22/01155/FULEIA), which was informed by our London Advisory Committee. Our concerns are set out in our letter of 30 January 2023 - whilst these still stand, we recognise that the existing consent is now a material consideration.

The discovery of part of the first Roman Basilica beneath the site is exciting and we welcome proposals to retain and display it, and the consequent slight reduction in height of the proposed tall building. This would slightly reduce harm to the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site, to St Michael, Cornhill (grade I) and the Bank Conservation Area, compared to the consented scheme.

However, harm would remain in each case and the harm that would be caused to the Leadenhall Market listed building (grade II*) and associated conservation area, which was the thrust of our objection, would remain largely unchanged.

Since the previous scheme was granted consent, UNESCO's World Heritage Centre requested that the UK Government submit a report about the World Heritage Site's

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.

State of Conservation, because of concerns about the cumulative impact of tall buildings in its setting. The proposals for 85 Gracechurch Street would adversely impact attributes of the Outstanding Universal Value (OUV) of the World Heritage Site, which attracts the greatest possible weight as the most important part of the World Heritage Site's significance. This will need to be taken into account, particularly in the context of the cumulative impact of tall buildings encroaching on the Tower's setting.

Historic England Advice

Significance of the heritage assets

a) Leadenhall Market

The development site is within the Leadenhall Market Conservation Area. This is a small conservation area centred on the grade II* listed market buildings, with tightly drawn boundaries which reflect the predominantly low scale of the characterful historic buildings, which contrast dramatically with larger-scale modern buildings immediately adjacent. The market is a highly valued part of the historic City.

The existing character of the conservation area relies on a delicate balance between the historic street frontages and buildings outside its boundary of a markedly different scale and character. Some of these juxtapositions are positive and others are not, often depending on their proximity and physical relationships.

b) Bank Conservation Area and the Church of St Michael, Cornhill

The western side of Gracechurch Street is within Bank Conservation Area and shares similar characteristics to the Leadenhall Market Conservation Area opposite.

St Michael's Church, Cornhill is Norman in origin and was rebuilt after the Great Fire of London. The upper levels of the tower were completed by Nicholas Hawksmoor in 1722. His rich gothic design finishes the four massive corner turrets with elaborate panelling and finely detailed pinnacles. The church is grade I listed reflecting its exceptional architectural and historic interest.

Due to the enclosed nature of the site, there are few good views of the church or its tower - one good view of the tower is from the public space east of the Royal Exchange, where the viewer is not constrained by the relatively narrow width of Cornhill. The clear sky behind the tower in this view makes an important contribution to the ability to appreciate its significance as a local landmark and its architectural detailing.

c) The Tower of London World Heritage Site

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The Tower's attributes, as defined in the adopted WHS Management Plan (2016), convey its Outstanding Universal Value. They reflect the Tower as a model example of the development of a medieval fortress palace and its role as the site of many significant episodes of European history. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic, architectural and archaeological importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The Statement of OUV (SOUV) adopted by the World Heritage Committee in 2013, notes in the section relating to integrity that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.'

Impact of the proposals

The proposals are for the redevelopment of the site with a tall building of up to 147.9 metres AOD in height. The existing Gracechurch Street would be dismantled and rebuilt, effectively forming a plinth to the new development.

The dramatically different scale of the proposed building to the general scale of the conservation areas, and to that of the multiple heritage assets in whose immediate setting it would stand, would result in harm to their significance. The proposals would detract from the prominence of the listed market buildings and their roofscape, and would overshadow the top-lit arcades.

The upper levels of the proposed development would appear directly behind the pinnacles of St Michael's, Cornhill in the important view, just to the east of the Royal Exchange, described above. The prominence of the church tower and its filigree detailing would become lost against the proposals, harming the ability to appreciate its significance. The strong positive contribution the listed building makes to Bank Conservation Area would also be diminished, resulting in harm to the latter.

The proposals would impinge on the silhouette of the Chapel of St Peter ad Vincula when viewed from the Inner Ward of the Tower of London. This would cause some harm to the surviving medieval remains attribute of OUV. The key components of this attribute are the surviving associated buildings, including specifically the chapel, as the Statement of Outstanding Universal Value (SOUV) describes. The ability to appreciate these buildings, and so the attribute, in part relies on the contribution made by their settings.

Similarly, the proposals would cause some harm to the concentric defences attribute. Their visual dominance (alongside the White Tower) was central to the control of the

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City following the Norman Conquest, during the Middle Ages and as late as the nineteenth century. The way in which the setting of the City is perceived from within and outside of the Tower's boundary is key to appreciating its strategic function.

The sense of encroachment of the Tower's surroundings would contribute to an already significant erosion of its dominance, another attribute of OUV, which would also threaten the integrity of the WHS as the WHS Management Plan warns.

Relevant policy and guidance

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). Amongst these obligations are those under the 1972 UNESCO World Heritage Convention which includes requirements that the UK Government protects and conserves the World Heritage within its territory and ensures that it is transmitted to future generations.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 202 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

Tall Buildings policy (Policy CS14) of the adopted Local Plan indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3) recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

§ Proximity to asset
§ Position in relation to key views to, from and across
§ Prominence, dominance or conspicuousness
§ Competition with or distraction from the asset
§ Dimensions, scale and massing
§ Materials (texture, colour, reflectiveness, etc)
§ Change to skyline, silhouette

Historic England's position

Given the harm that the proposed development would cause to the City's historic

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environment, especially Leadenhall Market, its conservation area, and St Michael's Church, and the local plan's policy to protect the significance of such designated heritage, including by specifically avoiding tall buildings in conservation areas, Historic England maintains its objection to the application proposals.

We continue to raise concerns in relation to the harm to the ability to appreciate attributes of the OUV of the WHS, including its physical dominance, surviving medieval remains and concentric defences. This harm would be less than substantial in the language of the NPPF, and low in the range of such harm, but would contribute to a greater cumulative impact. Though the harm would be less than the consented scheme, it will need to be taken into account.

The status of the Tower of London as a World Heritage Site means that preserving that part of its significance, which comprises its attributes of OUV, as well as its integrity and authenticity, must be given the greatest possible weight. ICOMOS, as adviser to the UNESCO World Heritage Committee, has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (Bury House Technical Review, 20/00848/FULEIA).

We note that ICOMOS's comments in these cases concerned tall buildings at the edge of the cluster close to the Tower, as viewed from the south. The impact of the current proposals would be different and affect a narrower range of views from within the WHS, but would contribute to the overall negative cumulative impact of the cluster as described above. Recently, ICOMOS has indicated concern at proposed buildings that would have a more comparable impact to proposals at 85 Gracechurch Street (No.60 Gracechurch Street, 24/00743/FULEIA, No.70 Gracechurch Street, 24/00825/FULEIA and 47-50 Mark Lane, 24/01044/FULL).

The *Operational Guidelines for the Implementation of the World Heritage Convention* (2024) advise that a Heritage Impact Assessment (HIA) is essential for all interventions, including development projects, that are planned within or around a World Heritage property (paragraphs 110, 118bis). Specific guidance on the HIA process has been produced: UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022). A HIA in accordance with the toolkit, assessing the potential impacts on the attributes which convey the World Heritage Site's OUV, does not form part of the planning submission and is a key requirement.

The World Heritage Centre is already aware of the consented scheme for the site and requested information from the UK State Party to the World Heritage Convention about it in 2023.

Recommendation

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

Historic England objects to the application because of the harm to the conservation areas and listed buildings that it would cause, and the clear conflict with the Development Plan, given that there is no policy support for a tall building in this location. We additionally raise concerns in relation to the harm to the Tower of London World Heritage Site.

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.

Please contact me if we can be of further assistance.

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
[redacted]

cc Helen Hawkins, GLAAS

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.

City of London Conservation Area Advisory Committee

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

5th May 2025

Dear Sir/Madam,

At its meeting on 1st May 2025 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.70 25/00433/FULEIA - (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA
Leadenhall Market Conservation Area/Langbourn Ward. No Ward Club Rep.
Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

Whilst welcoming the slight reduction in height of the proposed building, the greening and the improved heritage offer, the Committee reiterated its objection considering that this proposal represented a significant overdevelopment of a constrained and sensitive site. Members agreed that there would be substantial loss of character in the Leadenhall Market Conservation Area and damage to the setting of nearby listed buildings. Whilst acknowledging the benefits to the Leadenhall Market and the area more generally in increasing the public realm and making provision for heritage display and interpretation on this site, the Committee was unanimous in its view that these benefits did not outweigh the serious damage to the character and appearance of the Conservation Area that would result.

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

Yours faithfully,

[redacted]

Mrs. Julie Fox
Secretary

From: [redacted]
To:
Subject: Full Party Planning Application – 25/00433/FULEIA
Date: 06 May 2025 10:10:16

THIS IS AN EXTERNAL EMAIL

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

Our DTS Ref: 73667
Your Ref: 25/00433/FULEIA

6 May 2025

Dear Sir/Madam

Re: SITE KNOWN AS 85 GRACECHURCH STREET 83-87, GRACECHURCH STREET, -, LONDON, , EC3V 0AA

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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloper%2Flarger-scale-development%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144047534%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=cCQAYaYYLq2Tdf9fc0SBkB7kyTuGukMRtqyTo2y%2F6ZY%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason:- Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. 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.

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 clear 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://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloper%2Flarger-scale-development%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144047534%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=2%2BJ%2FqAhDUWJxxjRbSxcugxvHSSZvvIEP37u8YVU2z0K=%3D&reserved=0 Should you require further information please contact Thames Water. Email developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water are currently working with the developer of application 25/00433/FULEIA to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 447m3 retail space or up to a peak flow of 1.5l/s for your development, but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and at such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 447m2 retail space, until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloper%2Flarger-scale-development%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144089576%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=NvwNuMAEsTFRNJKgcF/pRuiR4AUOHSWXcS8%2BGwy5Nl%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

Supplementary Comments

Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all pilling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

The Developer is also requested to confirm whether they have been in touch with Thames Water to discuss or arrange for the abandonment of any existing assets beneath the development site. Please give a short summary of any correspondence to date and any references they have been provided.

Plans of Thames Water apparatus can be obtained through our website at https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater-propertysearches.co.uk%3Fdata=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144089576%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=JrRs2BjRLLJWuDUJVGUnHFG1JqevrOnEfuGzw8N0zS8%3D&reserved=0. Please see the following reference in all future correspondence: DTS 73667.

Thames Water require a drainage strategy to be provided, detailing points of discharge for foul & surface water, together with expected flow rates and drainage hierarchy for surface water.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ.
[redacted]

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to
devcon.team@thameswater.co.uk
Visit us online https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdata=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144112519%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=yxpfFSeYzDo6MV1UjyFr0koCcoo8oIqDjNq3UQsIjvw%3D&reserved=0 , follow us on twitter https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.twitter.com%2Fthameswaterdata=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144128301%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=v9gJdsZgq0OWAF1wk1t42r2K%2FgNFdvGJ1oHotFBAIs27k%3D&reserved=0 or find us on https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.facebook.com%2Fthameswaterdata=05%7C02%7CPLNCommenets%40cityoflondon.gov.uk%7Cc1383398fe6a475e4d4308ddfbc7dcbe6%7C96e658cdb3cdd0568519222ffa96ebe8%7C0%7C0%7C638821194144169504%7CUnknown%7CTWFpbGZsb3dfeyJFbXBtb1UhcGkiOnRydWUsIlV2IjoiMC4wLjAwMDAwMCIsIkFuIOjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=yyjtOj9Gm1o4mDYRWJE6LvCrGbEgHkUMcY4cTm%2BQOY%3D&reserved=0. We're happy to help you 24/7.

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Corporation of London Department of Planning & Transportation Our DTS Ref: 73067 Your Ref:
PO Box 270 Guildhall London EC2P 2EJ 25/00433/FULEIA
6 May 2025

Dear Sir/Madam

Re: 85 GRACESHURCH STREET 83-87, GRACECHURCH STREET, -, LONDON, -, EC3V 0AA

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

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. “No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the

proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. “No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. 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.

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-

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Thames Water are currently working with the developer of application 25/00433/FULEIA to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 447m2 retail space or up to a peak flow of 1.5l/s for your development, but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 447m2 retail space, until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow

if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

Supplementary Comments
Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all pilling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

The Developer is also requested to confirm whether they have been in touch with Thames Water to discuss or arrange for the abandonment of any existing assets beneath the development site. Please give a short summary of any correspondence to date and any references they have been provided.

Plans of Thames Water apparatus can be obtained through our website at www.thameswater-propertysearches.co.uk. Please use the following reference in all future correspondence: DTS 73067.

Thames Water require a drainage strategy to be provided, detailing points of discharge for foul & surface water, together with expected flow rates and drainage hierarchy for surface water.

Yours faithfully

Development Planning Department

Application ref: 2025/1631/P
Contact: Sarah White
[redacted]
Date: 6 May 2025

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Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
(Known as 85 Gracechurch Street)
83 - 87 Gracechurch Street
London
EC3V 0AA

Proposal:
Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.
Drawing Nos: See City of London planning application ref. 25/00433/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Conditions and Reasons:

Informative(s):

1 Reasons for no objection:

The application site is a significant distance from the London Borough of Camden boundary and any heritage assets within the borough. Due to the distance, siting and nature of the works, the development is not considered to harm the character or appearance of Camden. It is noted that the proposed tower block would be visible in long views from the Borough, however it would not impede any protected or strategic views from the London Borough of Camden, including those towards St Paul's Cathedral.

In respect of impact on the amenity of residents within Camden, given the distance of the works proposed from the borough border it is not considered to give rise to any negative impact. As such no objection is raised.

If planning permission were to be granted, Camden would encourage a construction management plan to be secured in order to limit negative impacts on the vicinity and local vehicular traffic.

Camden would encourage a development of a high quality design and a development of the highest sustainability standards which would have minimal impact on the transport network.

It is advised that London Borough of Camden raises no objection, and the application should be determined under the City of London's planning policies.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully



Daniel Pope
Chief Planning Officer

SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0021

Date of issue of this decision: 12/05/2025

LBS Reg. No.: 25/OB/0021 **Date of Issue of Decision:** 12/05/2025
Your Ref No.:

Applicant City Of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.'

At 83-87 Gracechurch Street London EC3V 0AA

In accordance with your letter received on 15 April 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

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

Kieran McCallum
Environment Department
City of London Corporation
Sent via email only

16th May 2025

Dear Kieran,

Letter of Response: Development at 85 Gracechurch Street (ref: 25/00433/FULEIA)

I write on behalf of the Dean and Chapter of the Cathedral Church of St Paul, regarding the above live planning application.

Many thanks to Officers at the City of London for the additional time and assistance in reviewing this application.

The principal focus of the Cathedral with this particular scheme lies in potential impacts along the Processional Way, along Fleet Street leading to the Cathedral. This is an important and sensitive part of the setting of the Cathedral. The historic route between St Paul's and the Palace of Westminster forms a significant approach to the Cathedral and allows a unique appreciation of its architectural and historic interest.

We note from the submission material that the scheme has been designed to be entirely invisible along the Processional Way. Officers will be well versed in the methodologies and advanced technologies now used to assess the extent of visibility in these kinetic sequences. We request that, due to the sensitivity described above, Officers establish that they are certain that scheme is not visible in this approach – and that even extremely minor visibility, so often called

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technical visibility or impact, is not permitted. We request that this is confirmed for the length and breadth of the Processional Way.

We hope that this is a consultation response that furthers the shared aims of the Cathedral and City of London.

Yours sincerely,

[redacted]

Oliver Caroe; RIBA AABC
Surveyor to the Fabric of St Paul's Cathedral
For and on behalf of Caroe Architecture Ltd

cc: *Tom Nancollas, Deputy Director (Design), City of London*
Rebecca Thompson, Director of Property, St Paul's Cathedral

Directors:
Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:
Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269; Lewis House, Great Chesterford, Essex CB10 1PF

Tel: 020 8921 5222

ROYAL borough of GREENWICH

Kieran McCallum
City of London
PO Box 270
Guildha ll
London
EC2P 2EJ

Directorate of Place and Growth
The Woolwich Centre, 2nd Floor
35 Wellington Street
London, SE18 6HQ

25/1483/K
Y. Ref: 25/00433/FULEIA
19 May 2025

DECISION NOTICE –RAISE NO OBJECTION

Dear Kieran McCallum,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site:	**(site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V**
Applicant:	**C/O Agent**
Proposal:	**Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.**
Drawings	

I refer to your letter dated 14 April 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

Westminster City Council

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref: 25/00433/FULEIA
My ref: 25/02610/OBS

Please reply to: Nikki Mitchell
Tel No: [redacted]
Email:

Kieran McCallum
Environment Department
PO Box 270
Guildhall
London
EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

5 June 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.: 25/02610/OBS **Application Date:**

Date Received: 15.04.2025 **Date Amended:** 15.04.2025

Plan Nos: Letter from City of London Coporation dated 14 April 2025

Address: Development Site (Known As 85 Gracechurch Street) 83 - 87, Gracechurch Street, City Of London, London

Proposal: Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated

with the development including access and highways works.

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.



From: [redacted]
To:
Subject: 3rd Party Planning Application - 25/00433/FULEIA - additional info
Date: 05 June 2025 08:15:01

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

05 June 2025

Our DTS Ref: 73067
Your Ref: 25/00433/FULEIA - additional info

Dear Sir/Madam,

Re: SITE KNOWN AS 85 GRACESHURCH STREET 83-87, GRACECHURCH STREET, -, LONDON, -, EC3V 0AA

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms

should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water 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 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.
https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

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.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Email: [redacted]

[redacted]

From: Gavin McLaughlin
Sent: Thursday, June 12, 2025 7:52:10 AM
To: McCallum, Kieran
Cc: Begolli, Nora ; Paklim Wong
Subject: 85 Gracechurch Street 25/00433/FULEIA - TfL Spatial Planning comments

Hi Kieran

Sorry for the delay in us responding formally to this application:

25/00433/FULEIA | Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works. | (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA

We have the following comments:

The extant consent broadly establishes the acceptability of all transport impacts proposed. We consider recent revisions to the scheme in this re-submission to be relatively minor in strategic transport terms.

Footway widening and a new vehicular access in from Gracechurch Street form part of the agreed package of highway improvements, directly impacting the Transport for London Road Network (TLRN) of which TfL is the highway authority.

The overall servicing arrangement proposed, shown in Figure 2 below, is satisfactory in principle and appears to comply broadly with draft London Plan policy T7 (Deliveries, servicing and construction).

We also request a Section 106 (s106) agreement obligation for the applicant to enter into a Section 278 (s278) agreement with TfL at zero cost to TfL. TfL should agree the scope of TLRN works including during construction in the wording of the s106 agreement before it is signed, and it must specify the works may require strategic modelling to TfL standards at the Owner's expense.

A full Construction Logistics Plan (CLP) must be secured by pre-commencement condition and discharged in consultation with TfL as the highway authority for Gracechurch Street.

The pit lane and temporary crossover arrangement proposed on Gracechurch Street A10, under TfL highway authority as part of the TLRN, is not yet fully agreed in detail by TfL and requires extensive further discussions prior to implementation. An October 2025 commencement as referenced in the Outline CLP may be challenging to facilitate so soon in

terms of non planning consents and therefore seems practically unlikely. Early liaison with TfL to clarify expected access arrangements in particular is strongly urged. TfL is nonetheless happy to accept construction access from the A10 may be required and planning permission can be awarded on this basis by the City Corporation if they wish; the principle is accepted but designs and details must be optimised with full sign-off by TfL at every stage, and impacts on the strategic highway must be minimised as far as possible throughout.
Temporary works to facilitate construction must form part of a separate s278 agreement with TfL and this should also be specified in the planning decision and s106 agreement.

Furthermore, a Stage 1 Road Safety Audit (RSA) needs to be conducted by a TfL-approved suitably qualified and independent safety auditor prior to implementation for both the temporary and permanent s278 works to the TLRN. A Designer's Response to the Stage 1 RSA must also be shared with TfL for approval and further comments prior to commencement, and the highway works may need to be redesigned significantly if they are deemed likely to increase road danger. That would be unacceptable due to sub-section F of draft London Plan policy T4 (Assessing and mitigating transport impacts). TfL's RSA team will assess (as part of the mandatory Auditor verification process) the size and scope of the scheme and whether an equivalent to the Site Visit can be done using online mapping only. This must be agreed with TfL's RSA Team in advance of the Audit being completed. In some cases it will not be possible to complete the RSA without a site visit, in which case the audit will need to be deferred. Any deviation away from SQA-0170 without prior approval from TfL's RSA Team may result in the RSA being rejected and needing to be redone.
Full public access 24/7 along the re-opened pedestrian connection from Gracechurch Street to Lime Street Passage, including for cyclists, should be secured in perpetuity in the s106 agreement.
The proposed delivery and servicing restrictions for access by motorised vehicles to be overnight only in the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings, and 21:00-07:00 on Sunday and Monday evenings, should be secured by condition to enable future planning enforcement if necessary. This must not apply to cargo bikes. The proposed provision of facilities for cargo bikes is very welcome.
The cycle parking proposed, including under-provision against full London Plan standards, and some end of journey facilities and short stay cycle parking on upper floors, is considered acceptable and in sufficient accordance with London Plan policy T5 due to the unique archaeological challenges of the site.
The design and delivery of all cycle parking should be secured by condition and discharged in consultation with TfL. The full Delivery and Servicing (DSP) and Construction Logistics Plans (CLP) must be discharged in consultation with TfL as highway authority for the TLRN and this should also be explicitly acknowledged in the planning decision and relevant condition wording.

Thanks and kind regards,
Gavin McLaughlin MSc; MA; MRTPI
Spatial Planning I City Planning
Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course
M: [redacted]

[redacted]

PLEASE CONFIRM ALL MEETINGS IN MY OUTLOOK CALENDAR

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.



For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services

CoLAT

The City of London Archaeological Trust

Kieran McCallum
Environment Department
Corporation of London

By email only

13 June 2025

Dear Mr McCallum

Archaeology at 85 Gracechurch Street EC3
Ref 25/00433/FULEIA

Thank you for your letter of 14 April 2025 inviting comments on the proposed redevelopment at 85 Gracechurch Street. My apologies for this late submission, but hopefully our comments are not too late. These comments concern the management of the archaeology during rebuilding, and the presentation of the site in the future building.

On the procedures to be adopted during construction, we are satisfied with the work of MOLA and the advice of Historic England. We encourage you to ensure that every aspect of the advice and direction given by Historic England is observed. This will be to the credit of the developer and the Corporation.

The proposed presentation of the archaeology in the future building (as laid out in the MOLA document, their Cultural Plan or Cultural Strategy) is excellent. As proposed in part 5 of this, 'Cultural Vision', the archaeological remains will form an integral and central part of the building, not a sideshow or a display in a corner. A successful predecessor of this thinking was at Crosswall, which is the way to go. CoLAT welcomes the intention to give the archaeology of the City, in this extremely historical location, its proper place. This is necessary for the future well-being of the City.

Yours sincerely

[redacted]

John Schofield
Secretary, CoLAT

The City of London Archaeological Trust (CoLAT) was founded by the City of London and the Museum of London in 1974, to promote and assist all kinds of archaeological work in the City of London and its environs.

City of London Archaeological Trust: Chamberlain's Department, City of London Corporation, Guildhall, London EC2P 2EJ. Website: www.colat.org.uk. Charity No. 268160
Chairman John White Secretary John Schofield, 2 Carthew Villas, London W6 0BS. Email: john@jschd.co.uk

GREATER**LONDON**AUTHORITY

Good Growth

Kieran McCallum
City of London
By Email

Our ref: 2025/0460/S1
Your ref: 25/00433/FULEIA
Date: 23 June 2025

Dear Kieran McCallum

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
83 - 87 Gracechurch Street London EC3V 0AA

Local Planning Authority reference: 25/00433/FULEIA

I refer to the copy of the above planning application, which was received from you on 28 May 2025. On 23 June 2025, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0460/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 58 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Please note that the Transport for London case officer for this application is Gavin McLaughlin email gavinmclaughlin@tfl.gov.uk.

Yours sincerely



John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
James Small-Edwards, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
Theo Barker, Agent, DP9

GREATER**LONDON**AUTHORITY

Planning report GLA/2025/0460

23 June2025

85 Gracechurch Street

Local Planning Authority: City of London

Local Planning Authority reference: 25/00433/FULEIA

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing building and the erection of a 31 storey building comprising office use; flexible retail use, Public Hall; a Cultural Space; and a public exhibition associated with archaeological findings.

The applicant

The applicant is **Hertshten Properties Limited** and the agent is **Woods Bagot**.

Strategic matters summary

Land use principles: The redevelopment of the site within the CAZ for office is supported. The proposed cultural and exhibition uses with public access to the discovered archaeology are strongly supported.

Design and heritage: The proposed height massing and design is supported. A conclusion on policy D9 part C will be made at the decision-making stage. The proposals would result in less than substantial harm to heritage assets, however, the proposed public benefits if appropriately secured would clearly and convincingly outweigh the harm.

Other matters on **Energy**, **Whole Life Carbon** and **Circular Economy** require resolution prior to the Mayor's decision making stage.

Recommendation

That the City of London be advised that the application does not yet fully comply with the London Plan for the reasons set out in this report. Outstanding matters relating to energy, whole life carbon and circular economy should be addressed.

Context

1. On 28 May 2025, the Mayor of London received documents from the City of London notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in issuing his response.

2. The application is referable under the following categories of the Schedule to the Order 2008:

> 1D: "Development which comprises or includes the alteration of an existing building where: (a) the development would increase the height of the building by more than 15 metres; and (b) the building would, on completion of the development, fall within a description set out in

3. Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk

Site description

6. The site comprises an existing ground/basement plus 8 storey building within the Central Activities Zone and within London's Square Mile.

7. The building accommodates retail and storage floorspace at ground level with commercial floorspace on upper levels.

8. The site is located within the Leadenhall Market Conservation Area (LMCA) with the Grade II* listed Leadenhall Market located immediately to the north and east of the site. Bulls Head Passage is located to the south of the site and Lime Street Passage is located to the east (rear) of the site and with Bee Hive Passage directly to the east. The site has a PTAL rating of 6b on a scale of 0 (poor) to 6b (excellent).

Details of this proposal

9. The application proposes the demolition of existing building and the creation of a 31-storey building. The proposed uses would comprise office use (Class E(g)(i));

flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis).

Strategic case history

10. The GLA hosted a pre-application meeting with the applicant team (also attended by the LPA) in February 2025 in respect of proposals to redevelop this site for the demolition of the existing building on site and its replacement with an office-led tower incorporating a public exhibition space at basement level, public market hall at ground level and elevated public terrace and cultural events and exhibition space.

11. The Mayor has previously considered proposals at this site for the '*Partial demolition of existing building (Gracechurch Street frontage adapted) and the construction of a 32 storey (155.70m AOD) building plus basement levels including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); and Heritage Garden and Cultural Space at level 5 (sui generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works'* (GLA ref: 2023/0085 LPA ref: 22/01155/FULEIA). The City of London resolved to approve planning permission and on 23 July 2023 the Deputy Mayor advised the Council it could proceed to determine the application.

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021; and the City of London Local Plan (2015).

13. The following are also relevant material considerations:

    The National Planning Policy Framework and National Planning Practice Guidance; and,

    Draft City Plan 2040

    Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on Optimising site capacity and London View Management Framework which can be found on the GLA's website here.[1]

Land use principles

14. The extant consent granted in 2022 establishes the acceptability of the proposed commercial and cultural uses on site. The proposed development would deliver

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507

34,771 sq.m of office floorspace an uplift of 27,100 sq.m in office use. The proposed uplift in office floorspace would support the strategic functions of the CAZ and is supported.

15. The proposals will also include a 595 sq.m public hall and over 600 sq.m of cultural space. The creation of cultural floorspace would support the enhancement and expansion of London's cultural assets and would accordance with the objectives of policies HC5 of the London Plan.

16. Since the previous application, significant roman archaeology has been discovered beneath the building. As such, the cultural offer would be enhanced through the incorporation of the archaeology within an exhibition space which will be opened to members of the public. The proposed cultural use and space incorporating the roman archaeology is strongly supported. The City must ensure that the use is appropriately secured, as well as a Cultural Plan, Cultural Strategy and Cultural Management Plan along with public access

Urban design

Development layout and public realm

17. The proposals would provide a public hall with market stalls at ground floor level, along with the creation of a new publicly accessible east/west route connecting Gracechurch Street to Lime Street Passage.

18. The spaciousness, quality, and accessibility of the public hall is supported. The public hall will add variety to the public space available in the area. Careful consideration should be given to the curation of the space to maximise use and be inclusive and accessible to all. Consideration should be given to the legibility of the archaeological find and whether there is direct reference within the public hall.

19. The provision of the fifth-floor viewing terrace and its direct connection with the below ground archaeology, both of which will be publicly accessible, is supported. The public access basement cultural and exhibition space and terrace space at level 5 as well as the ground floor hall is strongly supported.

Scale, form and massing

20. The proposal includes a building up to 31 storeys. This constitutes a tall building according to the borough's local definition. The site is identified in the Local Plan as a site which is suitable for tall buildings. Accordingly, the proposals meet the locational requirements of London Plan Policy D9 (Part B).

21. The proposed height and mass of the building is similar to that of the extant consent. However, the built form of the proposals would be rationalised with a simpler and more elegant form.

22. Further consideration has been given to the visual transition from the retained historic building on Gracechurch Street to new building above. The changes have improved the appearance of the transition and is supported.

23. As such the proposals would have an acceptable visual appearance in local, mid-range and long-distance views. The detailed information submitted with regard to the functional and environmental impacts of the tall building will be reviewed by the Council and any necessary local mitigation must be suitably secured as part of any planning permission.

Architectural quality

24. The appearance of the proposed building is of high quality and does not raise concerns.

Fire safety

25. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

26. Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which requires that developments incorporate safe and dignified emergency evacuation for all building users.

27. The application documentation refers to the proposed creation of a green wall. Clarification should be provided that the green wall meets the highest standard of fire safety.

28. Furthermore, the Fire Statement does not contain a statement of compliance with the aforementioned policies as required by the Fire Safety draft guidance.

Inclusive design

29. The application sets out inclusive design matters, which includes consideration of the newly created public realm, step-free access to all parts of the building and terraces. The City of London should ensure that these measures are appropriately secured. The proposals would achieve an inclusive environment and be in accordance with London Plan Policy D5.

Heritage

30. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be

given to the asset's conservation and the more important the asset, the greater the weight should be.

31. London Plan Policy HC1 Part D requires development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Development proposals are required to make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

32. The existing building is overall a positive contributor to the significance of the conservation area. Its full demolition causes harm to the LMCA which is not mitigated by the partial façade replication proposed. This, taken together with the scale of the proposed development is considered to cause a high level of less than substantial harm to the LMCA.

33. This application is a revision of the previously consented scheme, mainly in response to greater clarity around archaeology. The site sits above the eastern (dais) end of the first Roman basilica, forming part of the forum complex. The survival of remains already established is substantial and further remains are anticipated to be found on full excavation. The remains are of national and international importance as clear evidence of the centre of government and administration in Roman London. Such remains are required by NPPF Para 213 footnote 75 to be treated by the planning system as designated heritage assets and this is reinforced by London Plan Policy HC1 Part D.

34. The proposals to excavate, preserve in situ and provide public access to and interpretation of the Roman archaeology are strongly supported. These moves are considered to form a heritage benefit. The proposed revisions to the structural design to reduce impacts on the archaeology are welcomed and supported. Appropriate conditions and Section 106 terms will be required to ensure that the public and heritage benefits are adequately managed and fully secured.

35. GLA officers consider that the proposed development causes the following levels of indirect harm to the significance of designated heritage assets, through change to their settings (in all cases the assessment is based on the cumulative scenario). The scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table of indirect (setting) impacts			
Designated heritage asset	**Category of harm**	**Extent of harm**	**View reference**
Leadenhall Market Conservation Area	Less than substantial	High	Views 1, 2, 3, 4, 5a, 5b, 6, 7, 9

Leadenhall Market and subsidiary numbering, listed building Grade II*	Less than substantial	Middle	Views 1, 2, 3, 4, 5a, 5b, 6, 7, 9
Nos. 81 and 82 Gracechurch Street, listed building Grade II	Less than substantial	Low to middle	Views 1, 2, 6, 7
The Lloyd's Building, listed building Grade I and Nos. 12 and 14-19 Leadenhall Street, listed buildings Grade II	Less than substantial	Low to middle	Views 9, 22, 23, 24, 25, 26, 29
Lime Street group: Nos. 37 and 39 Lime Street and The Ship Tavern, listed buildings Grade II	Less than substantial	Very low	None
Bank Conservation Area	Less than substantial	Low to middle	1, 2, 6, 9, 22, 26, 29, 30, 31, 32
Gracechurch Street North Group: Church of St Peter, listed building Grade I and associated gateway and Nos, 7 and 9 Gracechurch Street, listed buildings Grade II	Less than substantial	Low	Views 2 and 6
Church of St Michael, Cornhill, listed building Grade I	Less than substantial	Middle	Views 22, 26, 29, 32
Cornhill East Group: Nos. 39, 48 and 50 Cornhill, listed buildings Grade II	Less than substantial	Low	View 32
Cornhill and Lombard Street West Group: Royal Exchange and Church of St Mary Woolnoth, listed buildings Grade I; Nos. 15 to 22 Cornhill, listed buildings Grade II*; No. 1 Cornhill and Nos. 13 and 14 Cornhill, listed buildings Grade II	Less than substantial	Low to middle	Views 29, 30, 31
Bishopsgate Group: Lloyds Bank, Nos. 7 and 9 Bishopsgate and Royal Bank of Scotland, listed buildings Grade II	Less than substantial	Low	View 1
Gracechurch Street South Group: Credit Lyonnais and No. 2A Eastcheap, listed buildings Grade II	Less than substantial	Low	View 1
Philpot Lane Group: Nos. 7 to 8 Philpot Lane, listed building Grade II* and Nos. 23 and 25 Eastcheap, listed building Grade II	Less than substantial	Very low	None

The Monument, listed Grade I	No harm	No harm	Views 8, 11, 14, 15, 16, 17, 23, 25, 26, 29, 35, 39
Tower Bridge, listed building Grade I	Less than substantial	Low	Views 14, 15, 23, 29, 39
Cathedral Church of St Paul, listed building Grade I	Less than substantial	Very low	Views 9, 14, 16, 22, 24, 25, 26, 27a, 27b, 27c, 28, 35, 36, 37, 38, 39, 40
Tower of London Group including the World Heritage Site, multiple listed buildings Grade I, II* and II and the Conservation Area	Less than substantial	Low	Views 10, 11, 12, 13a, 13b, 13c, 14, 15, 16, 17, 29

36. As harm has been identified, the proposals do not comply with London Plan Policy HC1. However, in accordance with the provisions of the NPPF, the harm must be weighed against the public benefits. There are several identified heritage and public benefits, including the uncovering and public display of roman archaeology, exhibition space and public hall. GLA officers consider that the proposed public benefits have the potential to clearly and convincingly outweigh the harm to heritage assets. A final balancing exercise will be undertaken at Stage II once the public benefits package is secured.

Transport

Transport assessment

37. The proposed footway widening and a new vehicular access in from A10 Gracechurch Street directly impact the Transport for London Road Network (TLRN). The overall servicing arrangement proposed is satisfactory in principle and appears to comply broadly with draft London Plan Policy T7. The works will be covered in a S278 agreement which must be secured within the legal agreement.

38. A full Construction Logistics Plan (CLP) will be secured by pre-commencement condition and discharged in consultation with TfL as the highway authority for Gracechurch Street.

39. Though acceptable in principle, the pit lane and temporary crossover arrangement proposed during construction requires further discussions with TfL prior to implementation through the s278 process, to ensure detailed design and management is optimised and impacts on the strategic highway are minimised as far as possible throughout. Temporary works to facilitate construction will also

require a separate s278 agreement. A Stage 1 Road Safety Audit (RSA) must be conducted prior to implementation for all s278 works, both permanent and temporary, and on both City and TfL highway.

40. Delivery and servicing restrictions on access by motorised vehicles have been agreed outside the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings, and 21:00-07:00 on Sunday and Monday evenings. The proposed provision of facilities for cargo bikes is welcomed.

41. The cycle parking proposed, including under-provision against full London Plan standards, and some end of journey facilities and short stay cycle parking on upper floors, is considered acceptable due to the constraints of the site.

42. A final Delivery and Servicing (DSP) and Construction Logistics Plans (CLP), and Travel Plan should be appropriately secured.

Environment and sustainable infrastructure

Energy strategy

43. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

    - Be Lean – further exploration of energy efficiency measures for the non-domestic element;

    - Be Green – demonstration that renewable energy has been maximised, and further details of the proposed air source heat pumps;

    - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;

    - Energy infrastructure – further details on the problems with the design of district heating network connection is required

Carbon savings

44. For the non-domestic element, the development is estimated to achieve a 18% reduction in CO2 emissions compared to 2021 Building Regulations.

45. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. This is below policy expectations and the carbon savings should be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has

been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

46. The applicant has submitted a whole life-cycle carbon assessment, as required by London Plan Policy SI2. The WLC assessment does not yet comply with London Plan Policy SI2. Further technical information is required on evidence of the modelling review process and material quantities and assumptions.

47. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions, suggested condition wording is available on the GLA website[2].

Circular economy

48. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with London Plan Policy SI7. Further information is required on construction waste factors for modules A and B.

49. A waste management plan that meets requires of London Plan policy must be appropriately secured. A condition should be secured requiring the applicant to submit a post-construction report, suggested condition wording are available on the GLA website[3].

Urban greening and biodiversity

50. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.33 which exceeds the target score of 0.3. The Council should secure all greening measures to ensure the specified target is met.

51. The applicant has set out that there would be a biodiversity net gain of 5476% which complies with the London Plan. Measures to secure the biodiversity net gain should be secured by the Council.

Flood risk, sustainable drainage and water efficiency

52. GLA officers have reviewed the Flood Risk Assessment (FRA) in terms of pluvial (surface water), groundwater and sewer flood risk. The site is considered to be at low risk from flooding.

53. The sustainable urban drainage strategy generally complies with London Plan Policy SI13, and the SUDS strategy should be appropriately secured by condition.

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

54. The proposed development would meet the requirements of London Plan Policy SI5 relating to water efficiency and consumption, and this should be secured by condition.

Air quality

55. The site falls within the City of London Air Quality Management Area. The applicant has provided an air quality assessment which concludes that the scheme would be air quality neutral and identifies that the proposed development would not require mitigation measures other than during the construction phase of the development. The Council should identify all appropriate mitigation and appropriately secure these as part of any future planning permission. An Air Quality Positive Assessment has been undertaken and concludes the proposed development would likely not lead to adverse impacts on local air quality and conditions for future occupiers.

Local planning authority's position

56. The City of London's planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in July 2025.

Legal considerations

57. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Conclusion

58. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

> **Land use principles**: The redevelopment of the site within the CAZ for office is supported. The proposed cultural and exhibition uses with public access to the discovered archaeology are strongly supported.
>
> **Design and heritage**: The proposed height massing and design is supported. A conclusion on policy D9 part C will be made at the decision-

making stage. The proposals would result in less than substantial harm to heritage assets, however, the proposed public benefits if appropriately secured would clearly and convincingly outweigh the harm.

Other matters on **Energy**, **Whole Life Carbon** and **Circular Economy** require resolution prior to the Mayor's decision making stage.

For further information, contact GLA Planning Unit (Development Management Team):
Matthew Woodhead, Principal Strategic Planner (case officer)
email: [redacted]

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

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From: [redacted]
To:
Cc:
Subject: 25/00433/FULEIA - Planning Objection
Date: 14 May 2025 10:10:21
Attachments: [redacted]

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I am writing to formally object to planning application **25/00433/FULEIA** in the City of London.

Please find attached our detailed objection letter outlining our concerns, and our request to speak at the planning committee.

Kindly confirm receipt of this email at your earliest convenience.

Yours sincerely,
Will Ryan
[redacted]
On behalf of the residents of 4 Bulls Head Passage (Will Ryan, Emma Baylis and Mann Vergan)

This objection letter is also available for download from here:
https://www.dropbox.com/scl/fi/rd514n3clpwrbhmiiun1o/85-Gracechurch-Street-objection-from-the-residents-of-4-Bull-s-Head-Passage-May-2025.docx?rlkey=pqhollmz0w78swveskk2644yp&dl=0

Comments on planning application ref 25/00433/FULEIA – 85 Gracechurch Street

These comments are submitted on behalf of the owners of three residential properties situated at 4 Bull's Head Passage, EC3V 1LU:

Flat A – Mann Vergan
Flat B – Emma Baylis
Flat C – Will Ryan

The flats are situated immediately adjacent to the proposed development and would share a party wall with the completed development. As owners and some of the closest neighbouring properties, we have a considerable interest in the development.

We **object to the proposed development** and previously lodged objections to the earlier application under reference 22/01155/FULEIA.

Please let us know when a planning meeting is convened as we intend to apply to speak at Committee.

Grounds for objecting

Our objections are on several grounds:

Amenity – noise, disturbance & construction risks
Character & appearance – impact on the historic environment/conservation area
Policy & use – planning policy

Elaborating on each:

Amenity – noise, disturbance and construction risks

As mentioned above, our residential properties are just metres away from the proposed development which will generate considerable disturbance to our properties, lives and livelihoods both during the development and upon its eventual completion.

The Health Impact Assessment submitted does not adequately address our considerable concerns with the impacts on our health as a consequence of living so close to the development site with significant disturbance to be expected from noise, vibration and pollution amongst other things.

At p16 (table 4.1) although it is noted that the residents were included in the consultation process, we have consistently raised concerns throughout the last three years and remain extremely worried to see that our health concerns have not been addressed. We are particularly surprised to see that it is deemed that *"no additional mitigations or recommendations are required*" despite the sheer proximity of our residential properties to such a large scale development.

Whilst a meeting with the developer's representatives was held in January 2025 at which we again raised our concerns about the proximity of our properties to the development and following which, at the developer's request, we granted access to our properties, we have yet to receive any further information or assurances as to how we will be kept safe during the demolition and development. By way of example, we raised concerns about the oversailing of large cranes and construction materials immediately above our properties – Flat C would be particularly exposed in the event of any falling materials with the roof of our historic property offering little protection.

We are further concerned to read the letter from the Environment Agency on 28 April 2025 setting out the potential risks of emissions and pollutants from vehicles and machinery used in close proximity to residential or commercial developments. As will be appreciated, such matters will be extremely concerning for us given our residential properties are extremely close to the development.

Character & appearance – impact on the historic environment/conservation area

In addition to our considerable concerns related to the amenity issues in relation to the development, Leadenhall Market is a historic and characterful attraction, comprising a listed building in a wider conservation area.

The character of the area is based in the historic frontages and low buildings in the conservation area. The addition of a 32 storey skyscraper is out of keeping with the character of the area, as confirmed by both Historic England and the City of London Conservation Area Advisory Committee. As residents, we remain concerned that these two leading authorities on the subject have raised objections which have not been addressed.

Policy & use

Furthermore, the construction of a 32 storey skyscraper is contrary to the London Plan Tall Buildings policy which states that:

"*proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area. Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it*"

Historic England have confirmed their view that the proposals result in harm to Leadenhall Market and the surrounding heritage assets. The plans are contrary to the adopted Local Plan which states that tall buildings should be avoided in conservation areas.

From: [redacted]
To:
Cc:
Subject: Objection to planning application 85 Gracechurch Street EC3
Date: 03 June 2025 15:36:37
Attachments: [redacted]

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Objection to Planning Application
85 Gracechurch Street EC3

1. Ref. No: 25/00433/FULEIA | Status: Pending Consideration
2. Ref. No: 25/00548/LBC | Status: Pending Consideration

3/6/25

Dear Sirs

I wish to object to these two applications. I understand that the developer has asked that theyshould be put before the Planning Committee at the same meeting. If I understand correctly, this will not be before the public consultation period for the second application is complete

1. I am the freeholder of 2-4 Bulls Head Passage EC3V 1LU. Hertshten Properties (the 'Applicant') owns 85 Gracechurch Street which abuts our property. The rear of our property overlooks their large lightwell, and we have several windows and ventilation openings in our rear wall which open up onto this lightwell
2. The present drawings submitted with the applications show that these openings would be closed during the building work
3. However, there is a Boundary Dispute between our properties, along with the associated dispute on the nature and extent of any party wall rights that the Applicant may have. This dispute is dated from 9/4/25, approximately 2 weeks before the second application.
4. I had originally informed the Applicant of these openings on several occasions, the first time at least 1 year ago, but it is only recently that discussions have started, after Ashley Patience of DPR, for the Applicant, served a draft Heads of Terms.
5. Ashley Patience and I met on 29/5/25 to discuss these matters and find a route forward that will avoid closure of these openings. From our discussions yesterday, I am hopeful that we can find a route forward, hopefully before the public consultation period for these applications ends. Ashley Patience and I are working at pace to find a resolution.
6. This route forward will require amendments to their plans presently submitted as part of their application.
7. I thus request that these applications are not sent to the Planning Committee till after agreed revised plans are submitted to you, so that we can resolve this matter

and withdraw this objection

Dr Chris Blatchley

Freeholder 2-4 Bulls Head Passage EC3V 1LU

WordDoc attached for ease of reading

Blatchley & Petrie

4 Bulls Head Passage, London EC3V 1LU

[redacted]

Objection to Planning Application
85 Gracechurch Street EC3

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2. Ref. No: 25/00548/LBC | Status: Pending Consideration

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This route forward will require amendments to their plans presently submitted as part of their application.

I thus request that the date that these applications are sent to the Planning Committee is delayed till after agreed revised plans are submitted to you, so that we can resolve this matter and withdraw this objection

Dr Chris Blatchley

Freeholder 2-4 Bulls Head Passage EC3V 1LU

LONDON MUSEUM

Kieran McCallum
City of London Corporation
Department of Planning and Transportation
PO Box 270, Guildhall
London
EC2P 2EJ

11 June 2025

Dear Mr McCallum,

London Museum and the 85 Gracechurch Street project (ref. 25/00433/FULEIA)

The London Museum was pleased to be approached in 2022 by Shaw Corporation, on behalf of Hertshten Properties (UK) Limited, regarding the planned redevelopment of the 85 Gracechurch Street site. Since then, we have been engaged in a positive and detailed dialogue about the opportunity to collaborate on the site's proposed Cultural Plan. Following the granting of planning permission in 2023, subsequent archaeological investigations uncovered the remains of the first Roman London Basilica—an extraordinary and historically significant discovery. The London Museum remains committed to working closely with Hertshten Properties to help curate a public exhibition that celebrates and shares this remarkable find with Londoners and visitors alike.

This partnership will be centred on the enhanced cultural offer now proposed for 85 Gracechurch Street, which has evolved significantly since 2023 following the extraordinary archaeological discovery on-site. At the heart of the revised plans is the in-situ display of the remains of the first Roman London Basilica, located at basement level 01. This space is set to become the centrepiece of a new immersive experience for London. The display will be complemented by innovative digital technologies, such as projection, allowing visitors to visualise and engage with the historic environment, including the rare opportunity to stand virtually on the stage of early Roman London.

LONDON MUSEUM

In addition to the Basilica display, the proposed ‘Heritage Garden’ on Level 05 will offer a publicly accessible outdoor space and heritage walkway, with open views across the rooftops of Leadenhall Market. Together, these elements create a unique setting to explore the origins and evolution of London. The site will also include bookable facilities, enabling schools and groups to access training and educational experiences rooted in one of the city's most historically significant locations. In our view, the benefits of such a partnership to the museum’s audiences and the wider public, in both the short and long term, are very exciting.

We are enthusiastic about the long-term partnership with Hertshten Properties and strongly support the 85 Gracechurch Street Cultural Plan. This collaboration offers significant short- and long-term benefits for the London Museum’s audiences and the wider public, contributing meaningfully to the local area around our future home in Smithfield and the broader Cultural offer for visitors to the City. Subject to further agreement, we intend to provide consultancy on both the in-situ exhibition at basement level, and the viewing terrace on the 5th floor. The site will offer authentic insights into Roman London, telling the stories of the craftspeople, merchants, and communities that once shaped this historic centre.

We look forward to continuing this conversation and working with Shaw Corporation, Hertshten Properties (UK) Limited, and our close partners in the City of London.

Yours Sincerely,

[redacted]

Alec Shaw
Director of the New Museum Project & Estate
London Museum

cc. Paul Davies, Head of Corporate Partnerships, London Museum

Blatchley & Petrie

4 Bulls Head Passage, London EC3V 1LU

[redacted]

Objection to Planning Application
85 Gracechurch Street EC3

1. Ref. No: 25/00433/FULEIA | Status: Pending Consideration
2. Ref. No: 25/00548/LBC | Status: Pending Consideration

16/6/25

Dear Sirs

Dalton Petrie and I ("we") are the freeholders of 2-4 Bulls Head Passage EC3V 1LU. Hertshten Properties (the "Developers") owns 85 Gracechurch Street which abuts our property.

Following our first objection on 3/6/25 related to Rights to Light, I wish to make a second objection to these tied applications on the grounds that they cannot meet Building Regulations K 5.4 that windows "should be safely accessible for cleaning":-

1. The Developers have submitted plans for a 30-story building which, for commercial reasons, occupies their freehold directly up to our freehold boundary. This would require that they oversail our freehold with a service cradle to clean their windows.
2. This oversail requires our permission, and without our permission they would trespass our freehold rights.
3. This can easily be avoided because the Developers have a clear choice to set back their building to ensure their service cradle remains within their freehold space
4. We were not aware that their plans for oversailing our freehold till recently.
5. We have made it clear to the Developers in writing on 11/6/25 that we do not grant permission to oversail our freehold property with their cradle and have asserted our legal rights as freeholders not to be trespassed.
6. It appears that the Developers intend in the future to rely upon the Access to Neighbouring Land Act 1992 ("the Act") to gain access to clean the windows once the building has been completed. However the Act cannot be used either to build a new property or for later access to service such a property.

Since Planning Consent should not generally be granted for applications where Building Regulations cannot be met, this Planning Application should either be rejected or put on hold till the Developers are able to amend their application so that they can show that they can meet the Building Regulations

Dr Chris Blatchley

Freeholder 2-4 Bulls Head Passage EC3V 1LU

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Committee:	**Date:**
Planning Application Sub-Committee	08 July 2025
Subject: Planning Application 23/01322/FULMAJ is to be referred back to the Planning Applications Sub-Committee in order to provide an update and to consider a potential amendment to Recommendation 3 of the resolution approved by the Sub-Committee on 11 June 2024. Application 23/01322/FULMAJ: *Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary). Re-consultation: Due to amended details (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).*	**Public**
Ward: Farringdon Without	**For Decision**
Registered No: 23/01322/FULMAJ	**Registered on:** 01 December 2023
Conservation Area: Chancery Lane	**Listed Building:** No

Recommendation

The third recommendation agreed at Planning Applications Sub-Committee 11 Jun 2024 be amended (as shown in italics) to read:

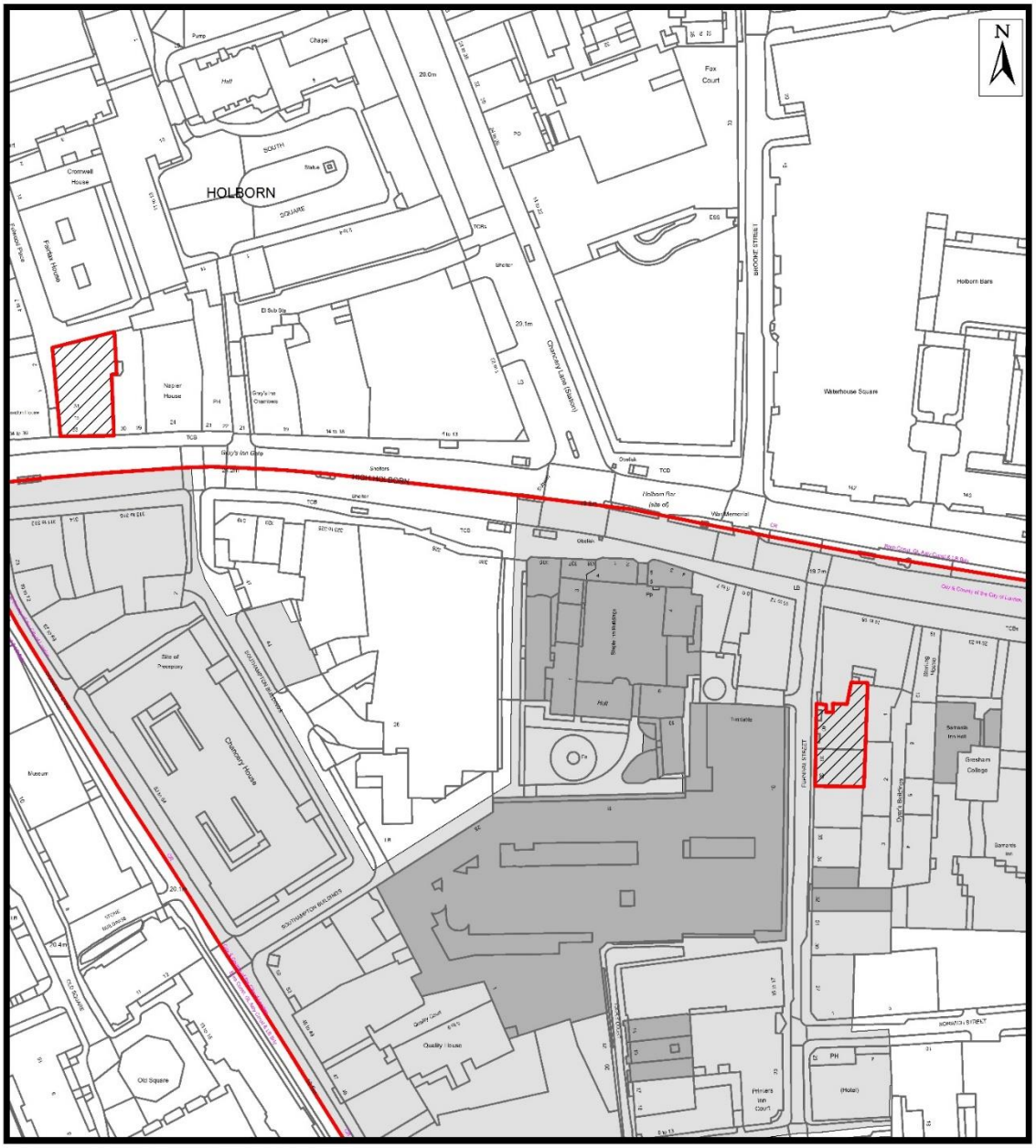
1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading ‘Planning Obligations’ the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule;

2. That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report;

   Or;

3. In the event that a legal agreement satisfactorily securing cross boundary obligations is not completed within *18 months of the date of the resolution delegated authority be given to the Planning & Development Director to* REFUSE permission for the substantive reason that the scheme fails to mitigate the adverse impacts noted within the officer report and is therefore contrary to the policies contained within the Development Plan.

Site Location Plan



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ADDRESS:
38-41 Furnival Street & 31-33 High Holborn

CASE No.
23/01322/FULMAJ

SITE LOCATION
LISTED BUILDINGS
CONSERVATION AREA BOUNDARY
CITY OF LONDON BOUNDARY

CITY OF LONDON
ENVIRONMENT DEPARTMENT

Main Report

Background of the Application

A full planning application at 38 - 41 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX was submitted on 1st Dec 2023 for the following proposal:

Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Under the proposals a secondary pedestrian entrance to the deep-level tunnels is to be located at 31-33 High Holborn via Fulwood Place (falling within London Borough of Camden) and upgraded to form the main entrance to the proposed bar and an additional emergency exit.

The National Planning Practice Guidance details that where a site, which is the subject of a planning application, straddles one or more local planning authority boundaries, the applicant must submit identical applications to each local planning authority. Therefore, at the same time as the above, a duplicate application was submitted to the London Borough of Camden as the site area extended across the borough boundary.

Each planning application falls to be assessed under the Town and Country Planning Act 1990 and both planning applications are assessed independently by each LPA, with each being entitled to reach its own decision on the application in the usual way.

Planning Applications Sub-Committee, Tuesday, 11th June 2024

The Sub-Committee considered a report by the Planning and Development Director concerning the proposed development at the Planning Applications Sub-Committee on Tuesday, 11th June 2024. The report was subject to the following recommendations:

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading ‘Planning Obligations’ the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule;

2. That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report;

   Or;

3. In the event that a legal agreement satisfactorily securing cross boundary obligations is not completed within 12 months of the date of the resolution officers be instructed to REFUSE permission for the substantive reason that the scheme fails to mitigate the adverse impacts noted within the officer report and is therefore contrary to the policies contained within the Development Plan.

As per the minutes of the of the Sub-Committee, given the complexity of cross-boundary developments, Officers endorsed a clause within the above Recommendation (point 3) that prevented the application gaining approval should the London Borough of Camden (LBC) duplicate application fail to gain approval at their Planning Committee. Had this been the case then the proposal would have essentially become undeliverable, by virtue of the lack of an appropriate legal agreement, and as such the clause would allow Officers to refuse the application on this basis.

The proposal has since gained a positive recommendation from the City of London and LBC at the respective planning committees and to date Officers continue to work on securing an appropriate execution of a legal agreement under Section 106 of the Town and Country Planning Act 1990.

However, given the complexities of the cross-boundary negotiations between the two local planning authorities, Officers are continuing to negotiate and are not yet in the position to finalise the legal agreement. Any agreement will therefore now be after the date recommended above in point 3 of the original Recommendation (i.e. after 11th June 2025).

Therefore it is recommended that, under these unique circumstances, additional time (6 months) be given for Officers to negotiate and execute the legal agreement under Section 106 of the Town and Country Planning Act 1990 and in the event that a legal agreement satisfactorily securing cross boundary obligations is not completed within 18 months of the date of the resolution, delegated authority be given to the Planning & Development Director which will permit further extension of time to negotiate the legal agreement if required due to its complexities or to REFUSE permission for the substantive reason that the scheme fails to mitigate the adverse impacts noted within the officer's report and is therefore contrary to the policies contained within the Development Plan.

Background Papers

As per 23/01322/FULMAJ report present at Planning Applications Sub-Committee, Tuesday, 11th June 2024 10.30 am (Item 5.).

APPENDIX A: Minutes of Meeting of Planning Applications Sub-Committee, Tuesday, 11th June, 2024 10.30 am (Item 5.):

Minutes: The Sub-Committee considered a report of the Planning and Development Director concerning the change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works. (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

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

Officers presented the application, stating that this was an application for the change of use of the existing tunnels, formerly known as the Kingsway tunnels, to a visitor and cultural attraction. Kingsway tunnels were located approximately 32 metres below ground, underneath the Central line. They ran beneath High Holborn and extended beyond the City of London’s northwest boundary over to the London Borough of Camden. The tunnel network offered approximately 8,000 square metres of subterranean floor space and included two tunnels of 5.1m diameter known as the North and South Streets which ran beneath High Holborn, and four large tunnels of 7.2 metre diameter to the south, known as the avenues.

Members were shown a diagram which highlighted the portion of the tunnels that fell outside the City's boundary line and was within Camden and the portion which fell within the City's boundary and represented 65% of the overall tunnel network.

The Officer advised that a duplicate application had been submitted to Camden Council which would be considered by their Planning Applications Committee on the 11 July 2024. Officers had been in discussion with Camden Officers to ensure coordination of all planning matters in line with both local planning authority requirements. The planning application was assessed independently by each local

planning authority, with each being entitled to reach its own decision on the application.

Members were informed that the streets were built during the Second World War as shelters. However, they were never used as intended. Instead, they were converted to reserve government headquarters. Once the General Post Office took their possession in the early 1950s, the avenues were constructed. Subsequently, the tunnels became a telephone exchange and by 1990 their function came to an end. BT currently managed and maintained the infrastructure.

The Officer stated that today, there were only two remaining soft access points to the tunnels, one located at 31-33 High Holborn, in Camden and accessed by 1 Fulwood Place and one at 38-39 Furnival Street, located within the northwest side of the of the City. Members were shown an image of the above ground works including the existing access points in the City and Camden, and the building at 40-411 Furnival Street, which was adjoining to 38-39.

The Officer stated that the site in the City sat within the Chancery Lane Conservation Area. The Kingsway tunnels had been identified as a non-designated heritage asset due to its history and rarity.

Members were shown an image of the relationship between the bulk ground structures and the tunnels. Members were shown an image of the late 1990s, 6 storey office building with a basement level. Its architecture and setting were not considered to be a positive contributor to the conservation area. Members were shown an image of the building which formed part of Kingsway tunnels. It housed a round shaft which was built for a goods lift to serve the east side of the tunnels historically and was currently not in operation.

Members were shown views of the site facing south towards Furnival Street and north towards Holborn. For completeness, but not for consideration by the Sub-Committee, Members were shown an image of the site in Camden which was currently the only access point to the tunnels.

In order to enable the creation of a principal entrance and ancillary spaces to the proposed large underground cultural exhibition space, the existing buildings at Furnival Street would be demolished and reconstructed. The reason for demolition arose from the requirement to enlarge the existing shaft and provide escape routes and from the demand for plant space that needed to be accommodated in the basement levels. The loss of office space at 40-41 Furnival Street was considered to be acceptable in policy terms.

Members were informed that in line with City's guidelines, an optioneering study had been undertaken. It assessed the options of retention, the extension requirements for ventilation and cooling equipment in order to bring high number of visitors to the tunnels as well as the need to meet the fire safety requirements for the site. The conclusion was the new build option.

The Officer stated that at ground level, the building line was set back in alignment with the neighbouring building to activate the principal site entrance facing north towards Holborn. Members were shown how the building layouts had been combined to provide sufficient space for the main entrance of the proposed cultural use with the necessary facilities provided at ground level.

Members were shown a diagram of the visitor entrance sequence. The arrival experience had evolved to consider the need to ensure security alongside the constant flow of people to ensure there was no queueing on the street. Members were shown the arrival route down into the tunnels and the exit route by the gift shop as well as the fire escape routes. Toilets were provided across the site and a changing place toilet was provisioned within Camden.

Members were shown a CGI of the main entrance which visualised the presence of the site on the street.

Three basement levels would be provided with ancillary space for the operation of the site e.g. refuse storage areas. A gift shop would be provided at first floor level with a mezzanine level right above. These areas would be accessible to all visitors at the end of their experience.

The third floor would be the plant room and would only be accessible by staff. The fourth level would be staff accommodation, provide end of trip facilities and a roof terrace for the use of staff only. Conditions had been secured for the hours of operation of the roof terrace. Green roofs would also be provided.

The Sub-Committee was shown the main elevation of the site. The proposed massing and height of the new structures would largely recreate the existing building proportions, whilst maintaining the urban grain of the east side of Furnival Street.

The brick façade of 38-39 Furnival Street would be reinstated and would include the existing concrete ventilation panel. The original metal work, which had been lost,

would be replicated and reinstated on the building with a methodology conditioned. The proposed buildings would be recessed.

Members were shown a map showing the residential premises to the west and south of the site.

Members were informed that loading would occur on Holborn between 8pm and 10pm. This location had changed over the course of the application and had been moved away from residential properties. Conditions had been recommended to restrict the hours of servicing.

Improvements to the public realm would be secured under the legal agreement. The plan showed the maximum extent of the Section 278 works, which aligned with the Healthy Streets Plan for this location and this was subject to further consultation.

A daylight sunlight assessment had been undertaken as part of this application. Overall, the impact on neighbouring properties was considered to be acceptable due to the high level of BRE guideline compliance.

Members were informed that in relation to vertical movements, there would be double decker, twin lifts, with maximum capacity of 60 people. These would provide access to the tunnels and the gift shop at the upper levels. In the case of an emergency evacuation, firefighting lifts and evacuation stairs would be available at both ends, with fire protected lobbies at the entry points and the secondary entrance in Camden would act as an emergency escape. This arrangement had been reviewed by building control and considered to be acceptable in compliance with the relevant policies. Accessible evacuation routes had been designed at both exit points in the City and in Camden.

In terms of sustainability, the proposed development employed a highly efficient and full electric HVAC system, heat pumps, cooling towers and water-cooled chillers with heat recovery, which helped reduce carbon emissions. Greening would be provided wherever possible at roof levels. The application secured a carbon offset contribution alongside an obligation to explore possible options for beneficial rejection of waste heat.

Members were informed that it was proposed to provide a cultural exhibition space in the majority of the tunnels. This area would be accessed from the proposed buildings in Furnival Street, and fell within both local authorities, with the majority being within the City. Members were shown images of the space and the pre-existing bar known to be the deepest bar in London would be recreated at the very west side of the

tunnels. The entirety of the bar floor space fell within Camden. Access and exit to the bar would be from Camden only. Members were informed that 71% of the total proposed area would sit within the City.

In terms of capacity, the exhibition areas had been designed to accommodate up to 750 people per hour, and the capacity for the bar would be 160. These figures were capped to ensure the site was safe.

The cultural use visitors would enter and exit from the City, whilst programmed school visits would enter and exit from Camden to allow for separate, safer and more efficient school tours. Members were advised that school visits would occur at least twice a week.

Members were shown images of the cultural exhibition space area which would be divided into areas of permanent and temporary nature. The permanent exhibition space would take place in the streets and Members were shown a diagram showing the circulation route. This area would make references to the historic timeline of the tunnels. A dedicated medium term exhibition would revolve around the character of James Bond deriving from the author's references to the tunnels in his books. It was intended to incorporate key elements of the heritage infrastructure within the exhibition space and Members were shown images of the equipment. It was intended that historic narratives would be brought to life through immersive use of large-scale audio-visual and digital interactivities to make the experience unique and stimulate interest.

In the three avenues it was proposed to create a temporary cultural exhibition space. Members were shown CGI images of the proposed immersive space for cultural exhibitions around art, science and nature. Opportunities for co-creation on the content of this area would be provided through partnership programmes. Up to 12 special events were expected to take place in the avenues over the year. Members were shown images of examples of these. Members were informed that Officers had secured by obligation, a public access and events management plan. The head of exhibition space would curate the history of the site in a most interesting and interactive way.

The Officer stated that the development would secure free school visits and discounted entrance tickets to certain groups of people and create opportunities to engage with local communities on the cultural content.

Inclusive procurement exploration for waste heat transfer Section 278 works and improvements to the public cycle infrastructure were also secured by this development.

In conclusion, the Officer stated that the proposal would include the provision for permanent and temporary cultural exhibition spaces to bring a new dynamic to the City and facilitate a 7-day and evening City, increasing footfall in this area and helping to revitalise the local economy. The proposal would assist in achieving the City's aspirations for Destination City that focused on enhancing the leisure and culture offer and cultural enrichment in the square mile and to increase its appeal to different audiences. Officers therefore recommended that the application be approved, subject to conditions and obligations as stated in the report.

The Clerk stated that there were no speakers registered to object to the application.

The Chairman then invited the applicant to speak.

Mr Angus Murray stated he was the CEO and major shareholder of this project which was conceived four years ago. His background was in finance around Macquarie Bank in the United States, as a regulated fund manager.

Mr Murray informed Members the tunnels could be seen in the model in the committee room. He stated that the four avenues were each about 78-80 metres long. The majority of the project already existed, and was built by the British to defend Europe during the Second World War but it was not used for that purpose. There were seven other tunnels which were not as large. The project was the restoration of an existing asset and saving the asset was part of the inspiration four years ago. The project would bring the story alive which would add to London, and also the City of London.

Mr Murray stated the project fitted in with the City Plan and the Destination City programme. He stated the tunnels would tell the story of the London Blitz and the 43,000 British people, who died during that period of time. He added it also then had the Special Operations Executive and there would need to be a partnership with an official museum to bring that content alive and tell the story of the 13,000 people, 3000 women who fought through that time.

Mr Murray stated that Ian Fleming had been inspired to describe the tunnel as Q branch in James Bond. He commented that the tunnels were used as the reserve war room to the cabinet war rooms and then as a telecommunications exchange after the war. After the war, they were expanded to the current size. There were enough construction shafts from the surface to the tunnels to ensure people could access and leave the site safely which was critical.

Mr Murray stated the tunnels would potentially add up to two million people into the City of London and Camden each year. It had been calculated that there were 60 to 80 million people annually into the Fleet Street retail area and also into Cheapside depending on the pathway that people walked. Three tunnels, 80 metres long each, would create a cultural experience within, that should have the backing of British artists.

The global media showed the tunnels would attract people and be a benefit to London as a whole and the City of London. Media coverage included CNN TV and the New York Times.

Mr Murray stated he was aware of the need to respect neighbours and minimise noise. He was also aware that this site was 30 metres below the ground, so it had a different set of safety measures. He added that the City had lots of tunnels, subways and tube stations so there were lots of qualified people to make the tunnels as safe as possible.

Mr Murray stated that the story being told was in part about military history. It had to be accessible for people of all ages and all abilities.

The Chairman asked Members if they had any questions of the applicants.

A Member asked how people would be evacuated if there was a power cut. Mr Michael Trousdell, WSP stated the building services had been designed to have two independent power supplies to provide a level of resilience into the scheme. In addition, there was the provision for generator backup for just for life safety systems, so that the steer pressurisation system, emergency lighting and equipment required to evacuate safely could be maintained in the very rare event of both power supplies failing.

A Member asked how the figure of two million visitors per year had been calculated. The applicant stated that this number was based upon the available square meterage inside the tunnel system. The number of people that could be accommodated on an hourly basis, was between 550 and 750 as a peak. That would not be all the time but gave an indication of a realistic number relative to the number of people per square.

In response to a Member’s question about visits of school children, the applicant responded that the proposal was to allow school children to visit for free and they would attend in groups of up to 40 children. If the applicants were able to, in time, the number of children could be increased.

In response to a question about the management of people entering and leaving the tunnels to prevent noise nuisance, especially noise aggregation in the street and congestion, the applicant stated that after clearing security, the aim was to move people into the system as quickly as possible, and in the lifts down to the tunnels. Afterwards people would leave into what was a busy area. The hours of operation were 9am-7pm so there should not be noise outside of these hours. The applicant stated that people would buy tickets online and would arrive in a certain block of time. Visitors would be brought inside as quickly as possible to give them the greatest amount of comfort. There would also be toilets inside.

In response to a Member's question as to whether there would be ambassadors in the street helping people disperse after their visit, the applicant stated that there would be staff helping visitors with their onward journeys.

A Member asked about the lift capacity and how long the security process would take as they were concerned about bottlenecks. Mr Robbie Arnold from WSP Transport stated that to gain access to the tunnels, there was a lift system, The lifts would accommodate 60 people so there would be staggered ticket times. On arrival visitors would enter the venue, go through security checks and into a lift. The lifts would take about five minutes to take people down and return. Using the staggered booking system, 750 people could be on site in an hour.

Visitors would visit the exhibitions in the tunnels and then exit through the gift shop. Overall, there could be 750 people on site. A dynamic legion model which was a pedestrian model, had tested 1,500 people per hour coming in and out, so 750 in and 750 people out and that demonstrated there would be no queues on the highway. Even a 20% uplift to 1800 people, demonstrated there would not be any queuing on the highway but that figure started to cause some internal queuing. Two million people per year was the maximum capacity. It was recognised that the busiest days would be weekends and bank holidays and during weekdays there might be slightly reduced numbers on site. To inform the assessment within the transport assessment, a dynamic legion model of Chancery Lane Station had been undertaken to look at the capacity of the gate lines, stairwells and the corridors in the station. This was undertaken for the 2023 date of the assessment and was informed by TfL data from 2023. It was also undertaken for 2041 and the uplift was taken into account. The same assessment was undertaken for pedestrian comfort level, which looked at the footways in the crossings of the local area to see what the uplift and the impact of all the assessments would be. It concluded that there would not be a significant impact. This was repeated with a 100% uplift to four million per year and the impacts on the local area were not shown to be significant. The detail was contained within the transport assessment and had been agreed with TfL and Officers.

A Member asked about the cultural offer including the immersive experience and partnerships with cultural providers. Mr Murray stated that there would be the story of the London Blitz with images of the history of London. This would be a digital, interactive experience. There would then be a section which would be a memorial to the people who perished during the London Blitz, 23,000 civilians in London itself, and 43,000 people in Britain who died during that period of time. There would then be the Special Operations Executive section and there would be a partnership with an official military museum, and the interactivity with physical real objects. Mr Murray stated that the James Bond theme had been written about in the media and the story could be brought alive. He further stated that the telecommunications equipment in the tunnels would be reactivated, not in terms of communication but to show the lights. Mr Murray stated that projectors and mirrors would be used in the immersive experience and he used Atelier des Lumieres, Digital and Immersive Art Centre in Paris, Team Lab in Tokyo and Moco Museum in Amsterdam as examples of the type of cultural space that would be created.

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

A Member asked a question in relation to fire safety. She asked for reassurance that the Fire Brigade's recommendation that a Qualitative Design Review process take place, would be undertaken. An Officer stated that there were several fire safety measures secured for the site e.g. people to be safety on the street within the required timeline. The London Fire Brigade had some concerns around several matters. The qualitative design review process was to be undertaken with the London Fire Brigade. It was expected that they would be consulted as a key stakeholder and this process would be undertaken post-planning and fell within the remit of Building Regulations. Members were advised that Officers had responded to the London Fire Brigade concerns and one of those concerns related to the firefighter access and the means of escape. Officers had recommended an access management plan to be secured by obligation and the emergency evacuation strategy and procedures would be requested to be reviewed by Officers. The developers would be required to go through the normal legal process of building control.

A Member asked what would happen if the City of London approved the planning application but it was not approved by Camden Council. The Chairman stated that the approved planning application would then fall. An Officer stated that Paragraph 3 of the recommendation explained that if a Section 106 agreement could not be entered into, which would be the case if Camden did not grant the planning permission, Officers would be instructed to refuse permission.

A Member asked for clarification on the servicing arrangements. An Officer stated that the expected number of deliveries on a daily basis would be about eight and these

would be on Holborn as Furnival Street was smaller and not suitable. Refuse would be collected from Furnival Street. Deliveries would take place out of hours.

A Member asked if scenario planning had taken place for a flood caused by a Thames Water failure. An Officer stated that a flooding evacuation plan was submitted as part of the application and had been reviewed by building control and climate resilience Officers. The management plan requested details of the evacuation procedures. The Officer stated that the site was located in Flood Zone One which had a very low risk of flooding and added that the water table ran beneath the tunnels. A flood evacuation strategy had been secured that would be further reviewed by building control. The Officer added the Local Flood Authority had raised no objections to the subject of the conditions that were attached to the recommendation and Thames Water had also made their comments, not objecting to the application subject to a groundwater risk permit being provided.

A Member asked if taxis would be restricted on Furnival Street and how this would work. An Officer stated that work had taken place with the applicant on this. One option to mitigate the impact of the proposal was to look at restricting vehicle access along Furnival Street, which would prevent taxis from pulling up on Furnival Street. The Officer stated that there would be a significant Section 278 contribution to look at improving the road to ensure the additional footways to accommodate pedestrians and look at preventing taxis from using Furnival Street whilst maintaining access for the existing premises. Refuge collection would be from there and there was a crossover opposite the site as well for a main delivery. There would be a further consultation with local businesses, residents and key stakeholders and a design phase and the fundamentals of mitigating the impact had been agreed with the applicant.

A Member raised concern for the occupiers along Furnival Street in relation to the impact on the servicing, the vehicles and the noise and the queuing outside. She also asked, if there was a problem which meant a delay getting inside the building or if there was an evacuation, where people would be contained. An Officer stated that an operational management plan had been secured and this would include how people were dispersed. Work had taken place to ensure that the evacuation from the tunnels was sufficient in terms of fire and flooding and where the people would go next would be part of the operational management plan which was also secured in the legal agreement.

A Member stated that people should be attracted to come to the exhibitions using public transport because there was less of an impact on the transport network and the streets but the nearest station was Chancery Lane and whilst there were escalators to get down to the platform, there was a flight of stairs to get out of the station. She stated that this was not accessible given the level of visitors the attraction hoped to bring into the area and stated that the developer should be required to help fund step-free

access at Chancery Lane Station. An Officer stated that an assessment was undertaken with the applicant to look at the flow of pedestrians through the site and into and out of the site and also through Chancery Lane Station to ensure there was capacity there. There was a discussion with TfL to see if they were in agreement and step-free access was discussed. The Officer stated this was not something they wished to pursue as part of this application.

A Member stated that she considered the number of free school places for children to be insufficient and asked whether more could be conditioned in order to increase the public benefit. An Officer stated that there would be two school trips per week with a maximum capacity of 40 children each so there would be 80 free school places per week. There was a cultural implementation strategy secured by obligation, which would explore the educational programmes and the applicant had committed to a minimum of two school trips per week. An Officer confirmed that Officers considered the minimum of two school trips per week was proportionate to the proposal. There was no identified heritage harm and therefore this was not a public benefit to outweigh that harm. This was a public offer that had been negotiated with the applicant. The applicant had indicated that on the appointment of the cultural operator, which would be confirmed through the cultural management plan, it would be intended to expand on the number of school trips and this would be through negotiation with Officers at that time.

A Member stated that the monument to commemorate people who lost their lives in the Second World War, outside St Paul's had disappeared from view. He asked if this could be incorporated into the scheme. Officers stated they could look into this.

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

A Member commented that she considered that with over 5,000 visitors per week, there could be more than two free school trips per week.

MOTION - A motion was put and seconded that the number of school visits be increased to one school trip per day each week.

The Chairman stated he would not support the motion as the Sub-Committee did not have the plans on the details of the safety requirements of schoolchildren or the safeguarding provisions made underground. He stated there had been negotiations between the applicant and Officers on reaching the proposed number.

A Member commented that the number of visits seemed small and one trip could be required as a minimum per day.

A Member raised concern about setting a precedent with a motion which had financial implications for the applicant and stated this was not a function of the Sub-Committee. A Member commented that the Sub-Committee had previously increased the number of school visits for a number of attractions to increase the public benefit e.g. the Tulip and the Sky Garden.

A Member suggested that motions should be case specific and stated that if the financial implications of increasing the number of school trips to five per week would result in the failure of the business, the business was not going to succeed.

A Member stated that the Sub-Committee should not be setting requirements on how the business should be run.

A Member stated that the Sky Garden was not the commercial part of the building. The commercial part of the building was leasing office floors so this was different. This would have a direct position on the profit and loss of the business which was not the case for the Sky Garden.

The Planning and Development Director stated that both the Sky Garden and the Tulip were policy, non-compliant and caused heritage harm. Therefore, the paragraph of the NPPF was activated in which public benefits were needed to outweigh the harm. In this instance, the application was policy compliant, with or without school groups.

A Member stated that Officers had previously negotiated more access to rooftop terraces and gardens and with the Tulip, the applicant was encouraged to increase the number of school visits per week. As part of Destination City, children should be encouraged to visit the City. The whole exhibition was about education, especially in relation to the Second World War and the only way to educate was to ensure that there were free spaces for children. She stated that she had concerns that not all of the issues above ground had been mitigated and therefore the free child spaces would be a public benefit.

A Member asked if the Sub-Committee could ask the applicant to agree to one free school trip of 40 children per day. The Chairman stated this was not protocol and the applicant would not be asked to enter into a negotiation during the meeting as this would not be fair.

Having debated the motion, the Sub-Committee proceeded to vote on the motion that the number of school visits be increased to one school trip per day each week.

Votes were cast as follows: IN FAVOUR – 6 votes
OPPOSED – 7 votes
There was 1 abstention.

Following the vote, a Member queried the votes cast. To clarify, the Chairman asked for votes to be cast again.

Votes were cast as follows: IN FAVOUR – 7 votes
OPPOSED – 7 votes
There was 1 abstention.

The Chairman using his casting vote, voted against the motion and it therefore fell.

[Deputy Michael Cassidy, Anthony Fitzpatrick, Jaspreet Hodgson, Deputy Edward Lord, Deputy Henry Pollard and Shailendra Umradia, who had not been present for the item, did not vote.]

Having fully debated the application, the Committee proceeded to vote on the recommendation before them.

Votes were cast as follows: IN FAVOUR – 15 votes
OPPOSED – None
There were no abstentions.

The recommendations were therefore carried unanimously.

[Deputy Michael Cassidy, Anthony Fitzpatrick, Jaspreet Hodgson, Deputy Edward Lord, Deputy Henry Pollard and Shailendra Umradia, who had not been present for the item, did not vote.]

RESOLVED -

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading ‘Planning Obligations’ the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule;

2. That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report;

Or;

3. In the event that a legal agreement satisfactorily securing cross boundary obligations is not completed within 12 months of the date of the resolution officers be instructed to REFUSE permission for the substantive reason that the scheme fails to mitigate the adverse impacts noted within the officer report and is therefore contrary to the policies contained within the Development Plan.

APPENDIX B: 23/01322/FULMAJ Committee Report and Addendum

Committee:	**Date:**
Planning Application Sub-Committee	11 June 2024
Subject: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary). Re-consultation: Due to amended details (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).	**Public**
Ward: Farringdon Without	**For Decision**
Registered No: 23/01322/FULMAJ	**Registered on:** 01 December 2023
Conservation Area: Chancery Lane	**Listed Building:** No

Summary

Existing site

The site is located in the northwest of the City to the south of High Holborn. It comprises below and above ground level elements. The underground element of the application site consists of a network of tunnels (formally named the Kingsway Tunnels) that run underneath High Holborn and cross the City of London and the London Borough of Camden boundaries. The tunnels are managed by British Telecom who are responsible for their maintenance. Above ground, the application site comprises three buildings. Two buildings are located within the City of London boundary at 38-39 and 40-41 Furnival Street and the third is located in the London Borough of Camden at 31-33 High Holborn, accessed via Fulwood Place.

The existing building at 38-39 Furnival Street forms part of the tunnels access, hosting a goods shaft and various ventilation ducts serving the eastern part of the tunnels and is currently not in use given the vacant nature of the application site. The building at 40-41 Furnival Street is in office use.

Proposals

The application proposes to change the use of the existing deep-level subterranean tunnels (Sui Generis) to a visitor and cultural attraction (Use Class F1 (b),(c)) including a bar (Use Class Sui Generis). The demolition and reconstruction of the existing vacant building at 38-39 Furnival Street and offices at 40-41 Furnival Street is being proposed in order to link the two buildings internally and use the ground floor as the principal entrance to the cultural attraction. The new buildings would also provide ancillary retail space, including a gift shop at the first and second floor levels and ancillary office accommodation, at the fourth level, to be used by staff. Public realm improvements, including a shared surface and widening of the pavement in front of the principal entrance at Furnival Street are proposed.

A duplicate application has been submitted to the London Borough of Camden as the site area extends across the borough boundary. A secondary pedestrian entrance to the deep-level tunnels would be retained at 31-33 High Holborn via Fulwood Place (falling within LB Camden boundary) and upgraded to form the main entrance to the proposed bar and an additional emergency exit.

The existing and proposed floorspace for different parts of the site is set out in the following table:

Schedule of Areas			
Building	sqm (GIA)		
	Existing	Proposed	Difference
38-39 Furnival Street (City of London)	194	942	+ 748
40-41 Furnival Street (City of London)	1,229	1,525	+ 296
31-33 High Holborn (Camden)	329	329	0
Tunnels Complex (City of London & Camden)	7,829	7,829	0
Total	**9,581**	**10,625**	**+ 1,044**

The following table provides the proposed GEA (Gross External Area) and GIA (Gross Internal Area) figures split between the two Local Planning Authorities. Approximately 71% of the site area created by the proposed development belongs within the City's boundaries.

	GEA	GIA		
Level	m2	m2	COL (GIA)	Camden(GIA)
38-41 Furnival Street	3,020	2,467	2,467	0
Fulwood Place	386	329	0	329
Tunnel Network	9,828	7,829	5,111	2,718
TOTAL	13,234	10,625	7,578	3,047

Consultations

On the 10th January 140 letters were sent to residential properties in addition to site notices posted on different locations around the proposed main and secondary entrances to the site. Following some minor updates and amendments to the proposed scheme a 14 days re-consultation round was carried out in April 2024.

A total of 57 letters of support have been received supporting the efforts of the proposal to utilise existing infrastructure by embracing and preserving the history of Kingsway Tunnels, boosting the local economy by bringing footfall in the area, creating new jobs and overall, creating a benchmark development of national importance.

A total of 24 letters of objection have been received, with the key themes of objections being residential and business amenity, traffic and highways, and the harm to the conservation area.

Two neutral responses have been received with comments made about noise and traffic.

A total of 12 statutory responses have been received none of which were objecting to the proposed development. Given the somewhat unique nature of the site, the subterranean layout and the long underground distances London Fire Brigade have indicated various measures that would need to be considered post planning stage. While there is no formal objection to the scheme under the Planning Act, it has been considered that further details of the fire strategy would only be known at the Qualitative Design Review (QDR) processes and therefore the applicant has made commitments to actively consult with London Fire Brigade and other emergency services to addresses all matters raised post planning application stage (i.e. under Building Regulations).

From the above, nine were received during the first round of formal public consultation. The second round of public consultation was carried out following receipt of amendments to the proposals, mainly with updates to the transport assessment and servicing plan. Only one new representation has been received following the proposal updates from the Transport for London Spatial Planning team which did not raise any objections to the proposed development.

The representations holding planning material consideration have been addressed in the report and relevant conditions have been recommended wherever necessary.

Loss of office

The planning application proposes the loss of office space at 40-41 Furnival Street in order to provide additional ancillary space for the operation of the proposed cultural use. In addition to the submitted Planning Statement supporting information for the proposed loss has been provided over the course of the application. While limited Viability Assessment documentation has been submitted as part of the proposal, the loss of the modest office has been weighed against the exceptional re-use of the adjoining heritage asset (38-39 Furnival Street and the existing tunnels), the inherent requirement of 40-41 Furnival Street for access/ancillary space and the wider economic benefits the cultural use would bring to the City as a whole. Whilst the Local Plan generally resists the loss of office floorspace, the scale of the loss on this site (1,229sqm) would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock for which there is demand or longer-term viable need. The proposed cultural and visitor use would not compromise the primary business function of the City as it would provide alternative complementary activities to the City's business function offering a unique experience for its workers, residents and visitors, and add a significant cultural supply

to the City's stock meeting Destination City's aspirations. It is considered that the loss of office floorspace would therefore be acceptable in this instance.

Cultural Use

The Local Plan and London Plan supports the delivery of cultural uses. The proposal would include the provision for permanent and temporary cultural exhibition spaces to bring a new dynamic to the City and facilitate a 7/7 City, increasing footfall and becoming an inclusive destination. The proposal would assist in achieving the City's aspirations for Destination City that focuses on enhancing the leisure and cultural offer in the Square Mile and increase its appeal to existing audiences by creating fun, inclusive, innovative, and sustainable ecosystems. The proposed permanent 'Heritage Experience' would directly reference the historic tapestry of the City and the flexible exhibition spaces, known as 'The Streets', would provide a unique and distinctive space for cultural events within the Square Mile. The proposed bar would further facilitate a 7/7 City and represent a complimentary use to the City's main function although it is noted that this element is located with the London Borough of Camden.

In addition to the above, the development would also bring about a series of social benefits including the provision of enhanced access for disabled people, free school trips, discounted tickets for special groups, training programmes, and opportunities to engage with the local community to shape the design of the exhibitions. Is considered to be an enhancement to the City's cultural provision and provide significant public benefit to residents, workers, and visitors.

Design and Heritage

The disposition of the final massing and bulk has followed a design-led approach considering macro and local townscape impacts with multiple pre-application negotiations to mitigate adverse impacts on surround heritage assets. In respect of massing, height and materiality, the distinctive sense of separate buildings, materials, the celebration of industrial heritage and intended quality would introduce a well-considered, refined, neighbourly architectural set piece. The bold architectural expression would reflect the unique cultural use of the buildings and the subterranean tunnel network.

The proposal would preserve the historic and rarity interest of the Kingsway Tunnels as a non-designated heritage asset and any harm which arises as a result of the development would be mitigated by the improvement to the accessibility and visibility of this currently unknown heritage asset to a wide public audience.

Public Access and Inclusivity

The tunnels form an existing infrastructure which the proposed development seeks to utilise. Accessibility standards were not included in their design at the time of their construction given the original intent of the structures. The proposal seeks to retain and restore the infrastructure without any construction works taking place in the tunnel network other than general fit-out works. Providing a highly accessible environment

for the site therefore comes with its own challenges. The proposed cultural use would offer step-free access along the site and provisions have been made for ground level accessible cycle space and a parking space for staff arriving on outdoor scooters. Large passenger lifts would provide access to the cultural space and the gift shop at the first and second floors and separate lifts would serve the upper levels including the staff accommodation at level four which is designed with accessible standards. The arrival to the site has been also considered, with improvements to the public realm focusing on pedestrian environment and capacity of the street. Details of the accessibility and inclusivity of the cultural development as well as the operational details for the site would be secured by conditions and Section 106 obligations to ensure highest levels of accessibility would be applied.

Public Realm

The proposal aims to deliver public realm works to improve the pedestrian environment and the capacity of Furnival Street. It sets the building line of No. 40-41 Furnival Street back to provide an inside foyer and increase the footway width of the main entrance. The original submission has been revised following Transport Officer's comments to align with the City's Healthy Steet scheme, specifically under the Fleet Street Area, Healthy Steets Plan which incorporates Chancery Lane neighbourhood improvements including Furnival Street. Improvement works would be subject to a design scheme by the Highways Authority which should take into consideration a shared surface along Furnival Street, parking arrangements and cycle lane revisions, provision of accessible seating available along the approaches to the development, repair works and greenery. Under the Healthy Streets initiative, the Local Authority would potentially consider time closures of Furnival Street to restrict vehicle access and create a more welcome and safer environment for pedestrians as well as maximising the capacity of the local street for the increased footfall generated by the proposed development, however this would be subject to further consultation with residents and local occupiers.

Transport

In term of public transport provision, the site has the highest level of Public Transport Accessibility Level (PTAL) of 6B. The submitted Transport Assessment (TA) in support of this application, included details on the trip generation and modal splits. The proposal aims to mitigate its impacts by including various public realm improvement works along the Furnival Street, in conjunction with the City of London's Healthy Street aspirations for the area, as discussed above. The general aim of the Healthy Street plan for Furnival Street is to redesign the street and manage access to make streets more accessible, engaging and providing safe places for people to walk, cycle and spend time. These highway improvements are to be secured through S278 works and its scope via the S106 legal agreement.

The proposal includes a compliant number of 12 long stay cycle parking spaces for the proposed cultural use and an additional 2 spaces for the bar should be provided, however short stay cycle parking for visitors would have to be provided on the public

highway given the constraints of the site. Considering the London Plan and Local policy, officers consider that for this type of use, short cycle parking spaces standards are of a provision of 1 space per 100sqm, thus 125 cycle parking spaces would be required. Due to the constraints of the development located on the Furnival Street and the large number of spaces required, it is not possible to provide these spaces within the development itself. Nevertheless, the application includes a S106 legal agreement to secure the provision of cycle parking spaces on the public highway, including improvements of the cycle infrastructure in the vicinity of this development. Over the course of the application, it was agreed to split the visitor cycle parking between the two LPAs, with LBC agreeing to provide 20% of the total requirement in their highways.

Finally, the Construction Logistics Plans (CLP) and Delivery and Servicing Plans (DSP) are proposed to be developed in accordance with TfL guidance and the latest standards and as such both plans would be monitored throughout the demolition and construction phase and thereafter when the development becomes operational.

Daylight/Sunlight and Lighting Scheme

With regard to daylight sunlight impacts, the surrounding residential and commercial buildings have been assessed against the existing and proposed massing of the proposed buildings. In particular 1 to 6 Dyers Buildings, residential properties immediately to the east of the site, have been assessed with other properties surrounding properties being given a lesser weight in the assessment due to their non-domestic nature and windows not orientated within 45 degrees of the uplift of the proposed development. 1-3 Dyers Building assessment results demonstrate a moderate to high level of BRE compliance. Where there are technical breaches of the BRE guidelines, these can be attributed to the low existing levels of daylight currently received by the neighbouring residential properties assessed, which would be sensitive to proportionately higher percentage reductions. 4 –6 Dyers Buildings have been included in later responses on daylight sunlight assessments and showed BRE compliance similar to that of the above.

While the application proposes to demolish the existing buildings at Furnival Street, the proposal seeks to redevelop the buildings in-line with the existing massing and height. This has been intentionally designed as such to ensure a limited impact on the amenity of surrounding neighbours and this is reflected in the very modest alterations to daylight/sunlight within the submitted assessment.

Overall, the daylight and sunlight available is considered to be sufficient and appropriate to the context, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with any of the relevant development plan policies.

Sustainability

The Local Plan and London Plan requires development to support environmental, economic, and social sustainability. The Plans also require that developments are

designed to maximise operational efficiency and minimise associated carbon emissions throughout the buildings' lifetimes.

The proposed development is a retrofit led proposal to bring a historic and well-storied asset, currently under-utilised, back into common usage of high cultural value. Demolition is mostly limited to Furnival Street where the practicalities of construction and accommodating services required make retention unviable. This proposed change of use does come with its own challenges. Built as air-raid shelter and telephone exchange, the tunnels were not designed for ease of access or extended occupation by large numbers of people. The access, ventilation, and cooling requirements to facilitate the proposed visitor numbers have been carefully designed to optimise energy efficiency and minimise waste heat but still come at a high carbon cost with large amounts of equipment, spanning the full length of the tunnels. The potential audio-visual equipment associated with the immersive cultural offering has been demonstrated to increase the carbon impact of the development significantly. However, the new building at Furnival Street has been designed following circular principles, with future flexibility, maintenance and disassembly in mind.

CIL and Planning Obligations

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

Conclusion and Recommendation

The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e., the London Plan and Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

It is almost always the case that where major development proposals come forward there is at least some degree of non-compliance with planning policies, and in arriving at a decision, it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up to date development plan without delay.

In this case, the proposals are considered to be in accordance with the development plan as a whole. In addition, the Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

It is the view of officers that as the proposal complies with the Development Plan when considered as a whole and taking into account all material planning considerations, it is recommended that planning permission be granted subject to all the relevant

conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

Recommendation

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading ‘Planning Obligations’ the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule;

2. That your officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report;

   Or;

3. In the event that a legal agreement satisfactorily securing cross boundary obligations is not completed within 12 months of the date of the resolution officers be instructed to REFUSE permission for the substantive reason that the scheme fails to mitigate the adverse impacts noted within the officer report and is therefore contrary to the policies contained within the Development Plan.

Site Location Plan

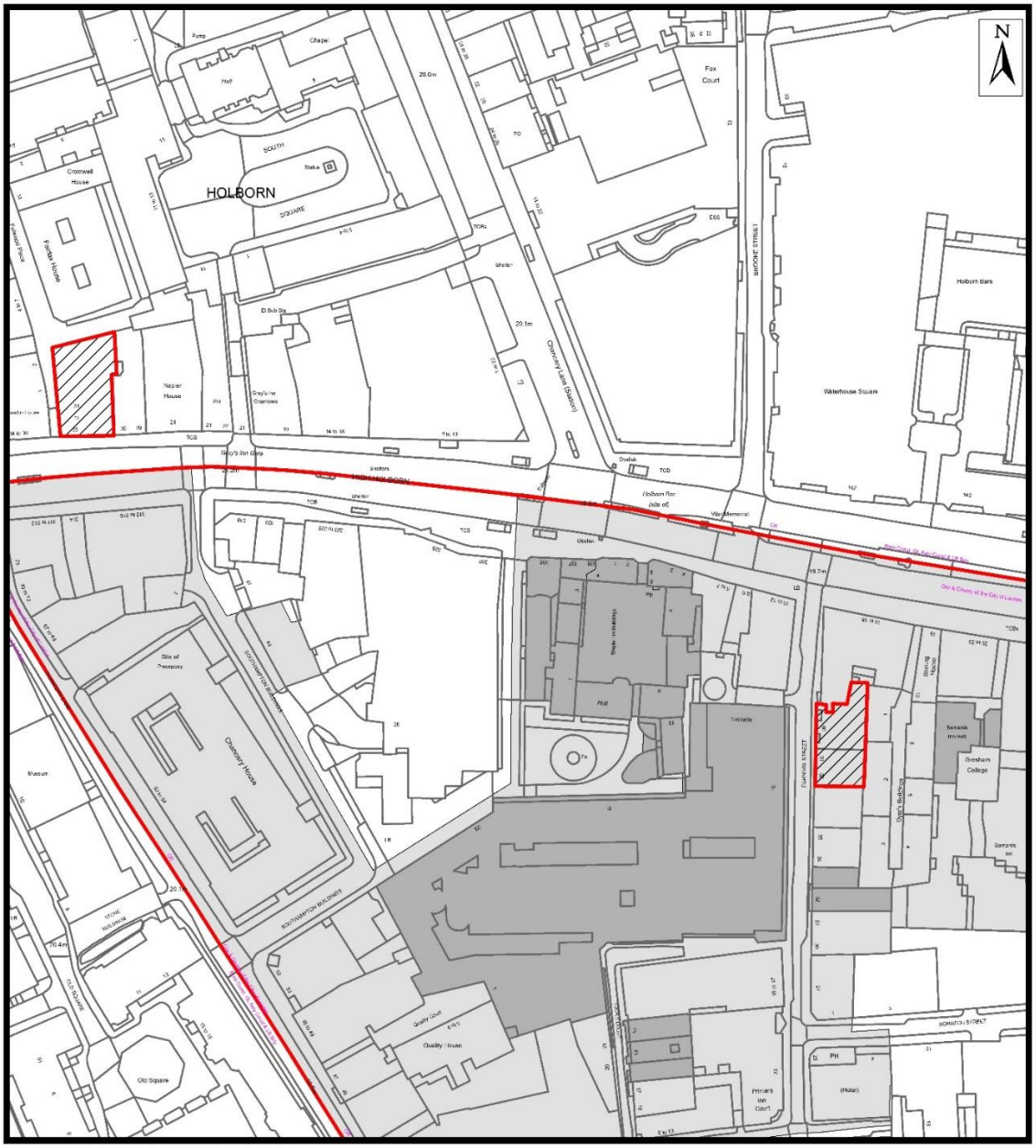

N
HOLBORN
SQUARE
Fox Court
Holborn Bars
Waterhouse Square
Furnival Street
Gresham College
Old Square
Museum
Observatory House
Site of Prerectory
Prudential
Prudential Assurance Co Ltd
Prudential Assurance Co Ltd
City & County of the City of London
Chancery Lane (Station)
Shelter
Holborn Flor (site of)
War Memorial
Fountain
Statue
Hall
Chapel
Pump
Cromwell House
Fairfax House
Nassar House
Greylime Chambers
Gray's Inn Gate
Shelter
Shelter
Shelter

Image 1: View looking north down Furnival Street



Image 2: View looking north across High Holborn towards 31-33 High Holborn



Image 3: Existing equipment with in the Kingsway Tunnels



Image 4: Existing canteen with in the Kingsway Tunnels



Image 5: Visual of proposed development looking south



Image 6: Visual of proposed Furnival Street entrance



Image 7: Visual of proposed heritage exhibition



Image 8: Visual of proposed bar



APPLICATION COVER SHEET

38-41 Furnival Street

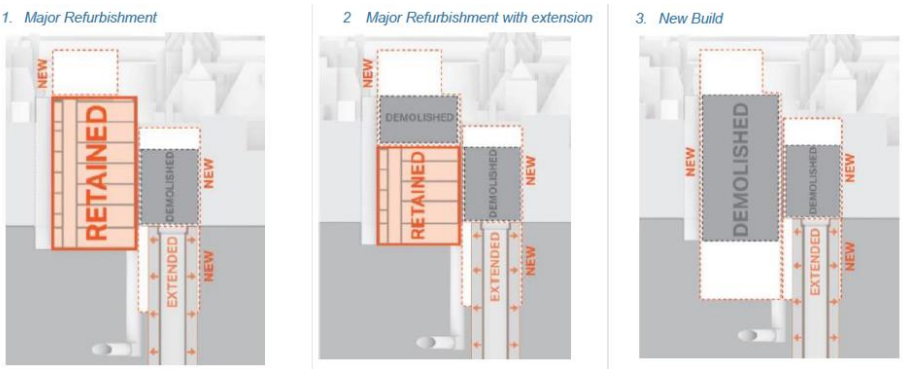
TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	AOD Heights: 39 Furnival Street: +32.25 AOD 40 Furnival Street: +43.89 AOD Fulwood Place: +49.09 AGL Heights: 39 Furnival Street: 12.4m 40 Furnival Street: 24m Fulwood Place: 27.5m		AOD Heights: 39 Furnival Street: +35.63 40 Furnival Street: +41.75 Fulwood Place: +49.09 AGL Heights: 39 Furnival Street: 15.8m 40 Furnival Street: 21.95m Fulwood Place: 27.5m	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Class F1 (Visitor Attraction)	0	10,341	
	Sui Generis (Bar)	0	248	
	Sui Generis (Tunnels)	8,352	0	
	Class E (Office)	1,229	0	
	TOTAL	9,581	TOTAL:	10,625
			TOTAL UPLIFT:	1,044
3. OFFICE PROVISION IN THE CAZ	Existing: 1,229 sqm Proposed: 0 sqm Office uplift: -1,229 sqm			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	Circa. 65		Circa. 85	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0

	Accessible car parking	1	Accessible car parking	1
	Cycle long stay	0	Cycle long stay	14
	Cycle short stay	7	Cycle short stay	125
	Lockers	0	Lockers	Staff: 18 small lockers Visitors: 9 large object lockers / 18 small lockers
	Showers	0	Showers	Staff: 2
	Changing facilities	0	Changing facilities	Staff: 2 Visitors: 1
6. HIGHWAY LOSS / GAIN	No loss or gain of highway proposed.			
7. PUBLIC REALM	S278 agreement to secure improve pedestrian environment and capacity of Furnival Street, to include a shared surface.			
8. STREET TREES	EXISTING		PROPOSED	
	0		0	
9. SERVICING VEHICLE TRIPS	EXISTING		PROPOSED	
	N/A		8 deliveries on a typical day and up to 14 vans during times when exhibition set up is required.	
10. SERVICING HOURS	All delivery activity will take place outside of opening hours and predominantly between 20:00-22:00.			
11. RETAINED FABRIC	90% of total site by area (Furnival St., Tunnels, & Fulwood Place) 0% of Furnival Street by area 14.2 m3 of brick, 1.4m3 of precast louvres (subject to condition)			

12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 41.4% (30.7 tCO2) GLA requirement: 35 %
13. OPERATIONAL CARBON EMISSIONS	B6 & B7 = 1,090 kgCO2e/m2 11,582,588 kgCO2e Based on medium scenario as set out in Sustainability section
14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA RETAIL BENCHMARKS (No benchmarks available for cultural buildings)

TOTAL kg CO_2e/m^2 GIA	Module A1-A5 (Excluding Sequestered Carbon)	Modules B-C (Excluding B6 & B7)	Modules A-C (Excluding B6 & B7; Including Sequestered Carbon)
Medium Scenario	745	914	1,652
GLA Benchmark	<850	<200	<1050
GLA Aspirational Benchmark	<550	<140	<690

Total upfront embodied carbon 7,911.8 tonnes CO_2e /
745 kgCO_2e per sqm

15. WHOLE LIFE-CYCLE CARBON EMISSIONS	Total whole life-cycle carbon emissions**:** 29,137 tonnes CO_2 Whole life-cycle carbon emissions per square meter: 2.742 tonnes CO_2/sqm
16. WHOLE LIFE-CYCLE CARBON OPTIONS	

Furnival Street Options	Option 1 Major refurb	Option 2 Major refurb with extension	Option 3 Redevelop-ment
1. Gross Internal area (GIA) m²	1979	2125	2589
2. Increase in GIA (over existing)	10%	35%	60%
3. Substructure % retained by mass	100%	100%	0%
4. Superstructure % retained by area (*frame, upper floors, roof, stairs, ramps*)	55%	35%	0
5. Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA)	666	616	818
6. In-use & End of Life Embodied Carbon (B-C) ($kgCO_2e/m^2$ GIA) *excl. B6 & B7*	464	461	453
7. Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	1,130	1,077	1,271
8. Fuel source	Electricity	Electricity	Electricity
9. Operational Energy Use (B6) of the Tunnels + Furnival St. (divided by GIAm^2 of Furnival St. only) ($kWh/m^2/yr$ GIA)	424	395	324
10. Estimated Whole Building Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	883	822	675
11. **Total WLC Intensity** (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) *Module B7 is not considered*	**2,026**	**1,918**	**1,977**

	12. Upfront embodied carbon (A1-A5) (tCO_2e)	1,318	1,309	2,118
	13. In-use embodied carbon (B-C, excl. B6 & B7) (tCO_2e)	918	980	1,173
	14. Operational carbon for building lifetime (B6) Tunnels + Furnival St. (tCO_2e)	1,747	1,748	1,746
	15. **Total WLC** (incl. B6 and pre-demolition) (tCO_2e) *Module B7 is not considered*	**4,009**	**4,077**	**5,117**
17. TARGET BREEAM RATING	Targeting a high-score “Very Good” BREEAM rating.			
18. URBAN GREENING FACTOR	0.13			
19. AIR QUALITY	As there are no anticipated operational emissions associated with the Proposed Development it is considered to be Air Quality Neutral.			

Main Report

Assessing a cross-boundary planning application

1. The application site straddles the City of London and the London Borough of Camden boundaries.

2. The National Planning Practice Guidance provides that where a site, which is the subject of a planning application, straddles one or more local planning authority boundaries, the applicant must submit identical applications to each local planning authority.

3. Each planning application falls to be assessed under the Town and Country Planning Act 1990. S70 provides that in dealing with a planning application the local planning authority should have regard to the development plan, any local finance considerations and any other material considerations. Planning and Compulsory Purchase Act S38 (6) provides that where regard is to be had to the development plan the determination should be in accordance with the development plan unless material considerations indicate otherwise.

4. Duplicate planning applications for the proposed *'Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works'* have been submitted to the London Borough of Camden (LBC) and the City of London (CoL) Local Planning Authorities (LPA). Each LPA will determine the application in accordance with the considerations below. Each planning application is assessed independently by each LPA, with each being entitled to reach its own decision on the application in the usual way.

5. The majority of the application site would fall within the City of London, with the northern 31-33 High Holborn site, providing the primary access to the bar and secondary emergency access to the tunnels, falling within the LBC's administrative area. However, the Planning Applications Sub-Committee is

required to consider the application as a whole and not just those elements which are within the City of London.

6. In considering this application the development plan comprises the City Local Plan 2015, the London Plan 2021 and other policies which apply in the City as referred to in this report. The emerging draft City Plan 2040 is currently in consideration. CoL officers have been in continuous liaison with LBC officers over the course of the application process, having shared the planning material considerations of the development and the assessment taken by each LPA to ensure any concerns or objections have been adequately addressed to the satisfaction of both LPAs. The application submitted to the LBC is due to be determined by its planning application committee on the 11th of July 2024.

7. If both authorities grant planning permission, each authority will grant permission in so far as it relates to land in their respective administrative area.

Site and Surroundings

8. The application site is 0.9ha in size of which approximately 0.7ha is subterranean and extends along two Local Planning Authorities, the City of London Corporation (CoL) and the London Borough of Camden (LBC). The underground element consists of a network of tunnels (formally named the Kingsway Tunnels) that run underneath High Holborn and Holborn, parallel and below the London Underground Central Line, and to the south below Staple Inn Buildings and Took's Court.

9. The Kingsway Tunnels were built in the early 1940s underneath Chancery Lane tube station with the purpose of sheltering 10,000 people during WWII. The original tunnels offered approximately 7,000 sqm of internal floor space including two 5.1m diameter tunnels known historically as 'North' and 'South' 'Street' that run parallel and below the Central Line beneath High Holborn. While originally constructed and intended to be used as a deep-level shelter, the tunnels were instead used by the British government as a secret telecommunications centre, including use by the Special Operations Executive (SOE). In 1949 the tunnels were given to the General Post Office (GPO). The two-tunnel shelter was extended by the addition of four tunnels of 7.2m diameter, known as the 'Avenues', at right-angles to the originals and a perpendicular service avenue of the same diameter connecting to all four. The additional tunnels were completed by 1954, and in 1956 it became the termination point for the first transatlantic telephone cable - TAT1. From the 1960s until the early 1980s, Kingsway Trunk Switching Centre (as it became known) was a trunk switching centre and repeater station with Post Office engineering staff totalling over 200 at its peak. At that point, the tunnels were closed following findings of large quantities of blue asbestos on the site. The

tunnels are currently not accessible by the public. British Telecom has a maintenance team accessing the tunnels via Fulwood Place.

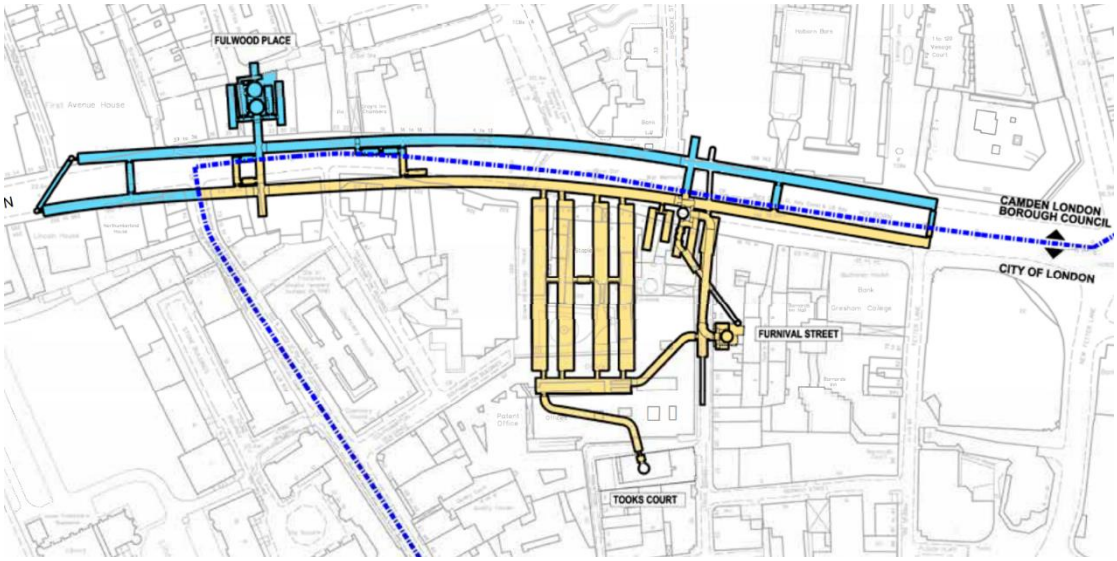


Figure 1. Tunnels network – light-blue portion in LB Camden, yellow portion in City of London

10. The original public access to the shelters was from Chancery Lane tube station and the historical entrance was located at 31-33 High Holborn. When the tube station moved to its present location, the original connection to the tunnels was blocked off, leaving only two access points at 38-39 Furnival Street (City) and at Fulwood Place (Camden) which were not designed for public use.

11. Currently the tunnels include historic elements such as mechanical equipment, a canteen, a games room, a bar, and other historic remains. Much of the historic equipment, such as the telecommunications board, are stored elsewhere.

12. Above ground, the site comprises of three buildings. Two buildings are located in the City of London boundary at No.38-39 and 40-41 Furnival Street and the third is located in the London Borough of Camden at 31-33 High Holborn, accessed via Fulwood Place.

13. The buildings at No.38-39 and 40-41 Furnival Street are located approximately 60m to the south of Holborn and they are bounded by Furnival Street to the west, the building at 36-37 Furnival Street to the south, 1-6 Dyer's Buildings to the east and 14-18 Holborn to the north. They are also located in the Chancery Lane Conservation Area which has a recognisable network of street from the 17th century, Southampton Buildings, Furnival Street, Cursitor Street, Took's Court and others. Within the north of the Conservation Area a great number of narrow building plots survive as originally set out in the medieval period, such as at 38-41 Furnival Street.

14. The building at 38-39 Furnival Street comprises of three storeys above ground and forms the east entrance to the tunnels, which is currently closed. It is seen to have a positive contribution to the conservation area as it offers a strikingly industrial aesthetic to the street, contrasting with the refined architecture of No.10 opposite. It combines concrete tiles at ground level and red brick at the upper levels. The two sides of the building step away from the neighbouring buildings creating a sense of a utilitarian brick block sitting on a concrete wall. Another unique element of the building is the louvred large concrete ventilation grille section in the middle of the brick 'block' on the front elevation. Internally the building houses a goods shaft and ventilation ducts serving the eastern part of the tunnels.

15. No.40-41 Furnival Street, is a late '90s six-storey office building including a basement level. It is one of the tallest buildings on Furnival Street and has a commercial appearance of its time. It has beige bricks at the ground levels, a glazed section in the middle of the upper levels with red bricks at either side and it gradually steps in at the uppermost levels. Contrary to No.38-39, the character of No.40 is out of keeping with the prevailing architectural aesthetic of Furnival Street due to its large bow front and is not deemed to be a positive contributor to the conservation area.

16. Together Nos 38-39 and 40-41 offer an area of 1,423 sqm.

17. Furnival Street comprises a mix of residential and commercial occupiers. There are residential premises near the site, with the closest being the adjoining 36-37 Furnival Street (Aston House), 34-35 Furnival Street and the Dyer's Buildings to the east. The premises across the street and immediately to the north of 40-41 Furnival Street are in commercial use.

18. Holborn is a prominent broad thoroughfare with a variety of uses and active frontages at ground level. It has a mix of historic and contemporary building stock with larger modern offices dominating parts of the street. Holborn serves a dual carriageway with double lanes for cars and bus routes. It has wide pavements and regular crossings, near the site, with a central island running along the street hosting cycle and motorbikes parking at locations towards the east side of the site. Bike lanes run along the edges of each carriageway offering east and west connections. Holborn extends to High Towards the west of Holborn is 31-33 High Holborn, the west entrance to the tunnels, comprising an area of 364 sqm with a mix of office and residential uses on the upper levels.

19. Chancery Lane Underground Station, Farringdon Station and City Thameslink are the nearest transport facilities to the site's entrances. The nearest public cycle parking spaces are located in High Holborn and Took's Court.

20. The site is located in the Chancery Lane Conservation Area. No.38-39 Furnival Street building, as an original part of Kingsway Tunnels, is considered to be a non-designated heritage asset due to its rarity and historic interest. The development site does not contain any statutory listed buildings. The nearest listed buildings and scheduled monuments to the site are 32 & 33 Furnival Street (Grade II listed), 10 Furnival Street and 25 Southampton Buildings (all Grade II* listed), and Barnard's Inn Mercers' School Hall (Scheduled Ancient Monument).

Relevant Planning History

21. This section is only relevant to the planning history of the part of the site located in the City of London.

22. The building at 38-39 Furnival Street is one of the original assets of the Kingsway Tunnels which was built in the 1950's to ventilate the tunnels. There is no planning history linked to this asset.

23. The existing building 40-41 Furnival Street was built by virtue of planning permission 1205D granted on 2nd December 1988 for the demolition of the previous buildings at 40-41 Furnival Street and construction of a new office (B1) building.

24. There is no additional relevant planning history to the site.

Proposal

25. Planning permission is sought for:
- The use of the Kingsway Tunnels as a visitor and cultural attraction (Use Class F1(b)(c)), including a bar (Sui Generis);
- The demolition of 38-39 Furnival Street and reconstruction of the building with four-storeys above ground and an outdoor amenity space to the roof level;
- The demolition of 40-41 Furnival Street and erection of a five-storey building with plant room to the roof level;
- Use of the new building at 38-41 Furnival Street as ancillary to the tunnels/cultural attraction including a principal entrance at the ground floor, hosting of MEP and plant equipment, ancillary retail (gift shops) and staff accommodation;
- Creation of a secondary entrance at 31-33 High Holborn via Fulwood Place (only relevant to London Borough of Camden);
- Provision of ancillary cycle parking, substation, servicing and plant; and

- Public Realm works on Furnival Street.

26. The following table provides the proposed GEA (Gross External Area) and GIA (Gross Internal Area) figures split between the two Local Planning Authorities. Approximately 71% of the site area created by the proposed development belongs within the City's authority boundary.

Table 1. Proposed GEA and GIA figures between CoL and LBC

	GEA	GIA		
Level	**m2**	**m2**	**CoL (GIA)**	**Camden (GIA)**
38-41 Furnival Street	3,020	2,467	2,467	0
Fulwood Place	386	329	0	329
Tunnel Network	9,828	7,829	5,111	2,718
TOTAL	13,234	10,625	7,578	3,047

27. The overall uplift in space would be 1,044sqm of GIA floorspace created by the redevelopment works at Furnival Street. There is no other uplift in floorspace in the tunnels or at the London Borough of Camden entrance.

Table 2. Schedule of Areas

Schedule of Areas			
Building	**sqm (GIA)**		
	Existing	**Proposed**	**Difference**
38-39 Furnival Street (City of London)	194	942	+ 748
40-41 Furnival Street (City of London)	1,229	1,525	+ 296
31-33 High Holborn (Camden)	329	329	0
Tunnels Complex (City of London & Camden)	7,829	7,829	0
Total	**9,581**	**10,625**	**+ 1,044**

28. The uses of the proposed development would comprise:

Table 3. Breakdown of proposed areas floorspace

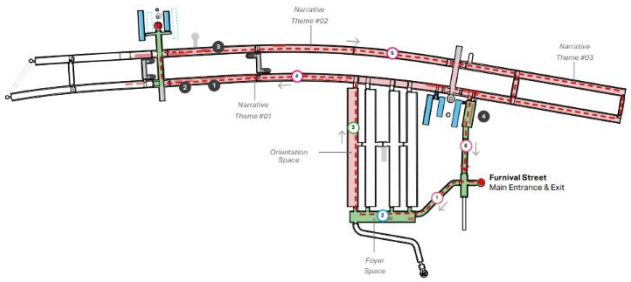
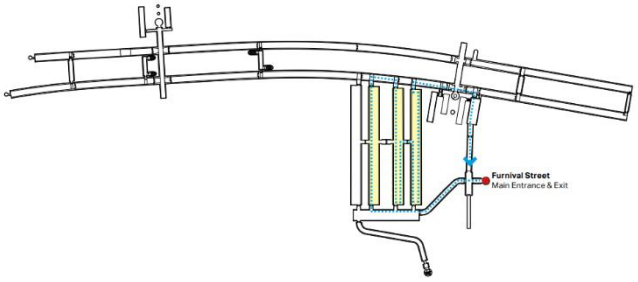
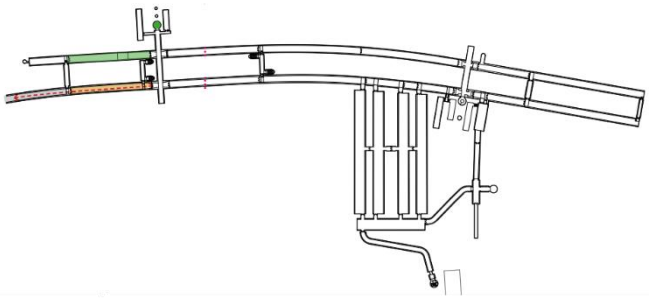
Use	Floorspace (GIA)
Bar (Sui Generis)	**284 sqm**
Visitor Attraction (F1) includes tunnels (excl bar), above-ground areas, and ancillary uses	**10,341 sqm**
Ancillary Office – Staff Office Space (F1)	58.2 sqm
Ancillary Retail – Gift Shop, Storage & Stair (F1)	227 sqm
Total Floorspace	**10,625 sqm**
Camden	*3,047 sqm*
City of London	*7,578 sqm*

29. The height of the proposed development would be 41.75m AOD at its highest part. The demolition of the buildings at 38-41 Furnival Street is being proposed instead of retention to allow an open excavation and enlargement of the existing lift shaft at 38-39 Furnival Street. The new buildings would share the same floorspace but their external appearance would indicate their individuality by articulating two facades. 40-41 Furnival Street would maintain its commercial aesthetic by featuring translucent glass bricks on the façade, whilst the brick façade and concrete louvre at No.38-39 would be reused and/or replicated to ensure the continuation of the building's historical character.

30. The ground floor elevation at 40-41 Furnival Street will be recessed to allow for more external space and a sheltered area at the proposed principal entrance. The ground floor of the combined building would provide step-free access to the underground cultural spaces via a round lift shaft which follows the form of the existing historic shaft at the same location. A reception check-in desk would be located next to the entrance and an X-ray scanner would be placed in the corridor that leads to the waiting lobby area to securely let people in the building.

31. The tunnels would be split into three different areas. These are described in the following table and depicted in the plans below.

Table 4. Proposed areas in the tunnels

Heritage Exhibition (shared between CoL and LBC – red area) – Permanent exhibition area focusing on the history of the tunnels and the people who occupied them. Integrates a mix of immersive experiences with the use of technology and the exhibition of historic remains. Main exhibition area: 'Streets' the two longest horizontal sections of the tunnels.	
Cultural Exhibition (solely in CoL – yellow area) – Temporary exhibition area using cutting-edge technology that creates fully immersive environments. To be adaptive for multiple cultural events. Main exhibition area: 'Avenues' the three parallel avenues that run in the southern part of the tunnels.	
Bar (solely in LBC – orange area) – The deepest bar in the UK. Accessed via Fulwood Place. The green area above the bar has been marked as a **multifunction space** which could be used as an Orientation/Classroom space during school trips.	

32. The Heritage Exhibition space makes up approximately 53% (1,965sqm of 3,713 sqm) of the total exhibition area (excluding front and back of house, ancillary uses, toilets, lobbies), and the Cultural Exhibition space makes up approximately 47% (1,748sqm of 3,713 sqm).

33. The Heritage and Cultural Exhibition spaces would be accessed via the new Furnival building, whereas the secondary entrance via Fulwood Place forms the main access point to the new deep-level bar. The exhibition spaces in the tunnels have been designed to accommodate a peak occupancy of 750 visitors at any given time which is only expected to occur 20 days (the busiest days) of the year. The typical occupancy is estimated at 490 people per hour in the tunnels (760pp/hr across the site) who are anticipated to spend one hour and twenty minutes in the exhibition areas. The technical occupancy of the tunnels (defined by evacuation, fresh air supply, and fire strategy) has been designed to exceed the occupancy numbers.

34. At the first and second floor levels of the new Furnival building ancillary retail space would be provided, to allow for a gift shop (on level one) and a gallery (on level two mezzanine) in connection with the cultural experience as the last part of the visitor's journey. Level three would be used to house mechanical equipment and would not be accessible to the members of the public. A staff room would be provided at level four with access to a roof terrace, utilising the roof of the new 38-39 Furnival Street building. The roof of the new 40-41 Furnival Street would be used as a plant room to host equipment that serves the tunnels which requires natural ventilation. Most of the plant equipment would be located above ground to facilitate its maintenance and accessibility. Two separate lifts would be provided at the rear of the building, one to be used by the members of the public leaving the gift shop area and the other for staff and goods transfer across all levels. Evacuation lifts, dedicated Fire-Fighters lifts, and evacuation stairs would be provided at each shaft (at both Camden and City entrances).

35. There would be three basement levels mainly used as plant rooms, including other facilities such as refuse storage and housing the new round lift shaft to the south side. Visitors would be taken to basement level three from where they enter the tunnels and begin their tour. The diagram below shows the visitor route in the exhibition areas.

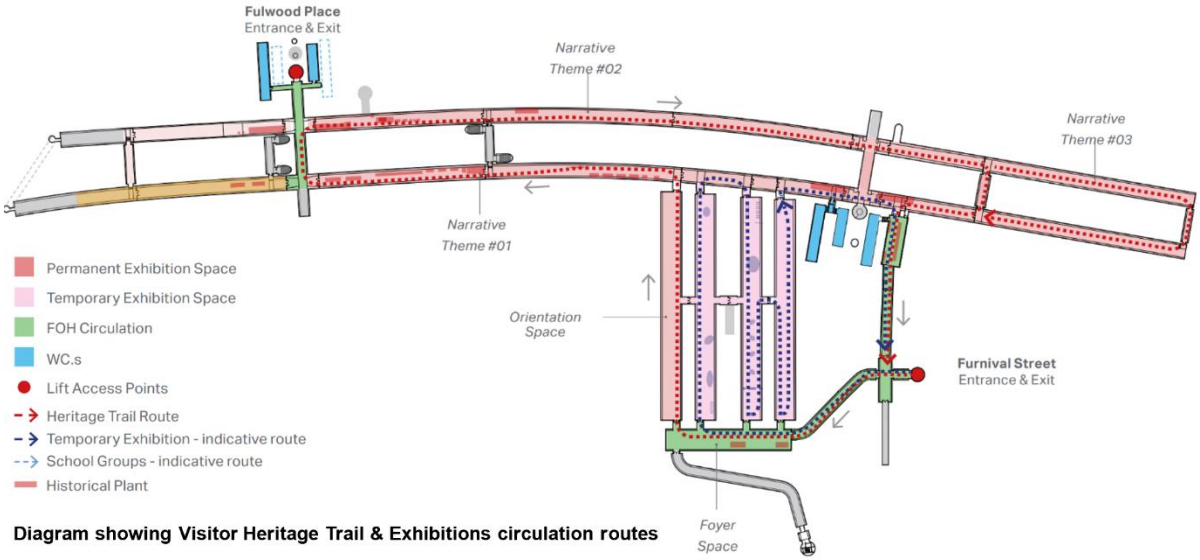


Figure 2. Diagram showing Visitor Heritage Trail & Exhibitions circulation routes

36. A total of 12 long-stay cycle parking has been proposed for the entire cultural use to be split across the ground floor and basement level, including an accessible space, accessed through the south side emergency exit. Visitor cycle parking is proposed off-site. Sperate cycle parking is proposed in Fulwood Place, Camden.

37. The proposed development would also provide public realm improvements to mitigate the impact on the public highway from the increased traffic and provide a safer welcoming pedestrian environment.

Consultations

Statement of Community Involvement

38. The Applicants have submitted a Statement of Community Involvement (SCI) outlining their public engagement with stakeholders including: a traditional public exhibition held in October 2023; a consultation website (www.thelondontunnels.com); special preview events; 4,473 newsletters posted to local addresses around the site including residents, businesses and community groups; a social media campaign was held alongside a further organic promotion to reach international coverage.

39. The public exhibition lasted for a calendar week and was held on Saturday 7th, Tuesday 10th, Thursday 12th and Saturday 14th of October 2023 at St Albans Centre, Leigh Place, Baldwin's Gardens, London, EC1N 7AB. The exhibition invited people to go to St. Alban's Centre and see the detailed design proposals

in person and meet with the team. In total 119 members of the public attended all six consultation events including key stakeholders and local residents.

40. A Ward Member Preview Event took place on Thursday 5 October 2023 and the Local Neighbour Preview Event on Saturday 7 October 2023. A list of stakeholders' names, their organisation and type/day of engagement is provided in full in the SCI.

41. 222 surveys were completed from the online and in-person engagement of which 99% were either positive or neutral about the proposal. The social media and website consultation also generated 48 emails and phone calls which have helped to inform the proposed development evolution.

42. The main areas of focus on consultation responses were accessibility, historic value and preservation, art and culture, technology and construction impact. The applicant sets out that consultees would like to see a highly accessible development that is inclusive for everyone not only physically but also financially, specifically ensuring the attraction remains open and accessible to a wide group of people. The history of the site has intrigued many consultees who would like to see it preserved and celebrated by retaining its authenticity and heritage/cultural value. Proposals from consultees to use technology for sustainability achievements were made that focus on climate change solutions and renewable energy but also a way to educate people on that field. Concerns were raised as to the increased footfall to the local area, causing disturbance and how that would be managed and mitigated by the development. Similarly, other concerns focused on the construction impacts affecting local traffic and noise levels along Furnival Street.

Consultation and notification

43. Following receipt of the application, it has been advertised on site on 21st December 2023 and in the press on 9th January 2024. Residents near the two entrances were included in consultations. On 10th January 2023, 140 letters were sent to residential properties, in addition to the publicity carried out as set out above. The relevant statutory consultees have been consulted following the validation of the application.

44. Following consultation feedback, the applicant made some design and highways amendments and updates on the accessibility and daylight sunlight reports. These were received on the 2nd April 2024. Accordingly, a 14-day re-consultation has been undertaken. On 23rd April 2024, re-consultation letters were sent to the same residential properties to inform them on the minor amendments to the scheme. Copies of all representations are appended in full and appended to this report at Appendix A. A summary of the representations received and the consultation responses is set out in the tables below.

45. The applicant has provided detailed responses to matters raised in consultee responses. The applicant's responses should be referenced as background papers at Appendix A.

46. The views of other City of London departments have been taken into account in the preparation of this report and some detailed matters are addressed by the proposed conditions and the terms of the S106 agreement.

Statutory Consultation

47. A total of 12 statutory responses have been received which are summarised in the following table.

Table 5. Statutory consultation responses

Consultee	Summary of comments
GLAAS	The comments make reference to the submitted archaeological desk-based study submitted as part of the current application. GLASS comments that remains of the late 17th Century were excavated on the southern half of the site which may have removed any evidence for the earlier inn. All archaeological remains have likely been removed from 40-41 Furnival Street. In relation to excavation works at 38-39 Furnival Street, it is likely that some archaeological potential remains and therefore further archaeological work is recommended in advance of the excavation of the new basement. Despite limited works being proposed for the tunnels, GLAAS notes that the tunnels are of high heritage interest and recommends that historic building recording for the site is carried out for them in advance of development. A condition has been recommended along these lines. In accordance with NPPF paragraph 205 the applicant should record the significance of any heritage assets that the development harms. Applicants should improve knowledge of assets and make this public. GLAAS advices that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. It is considered a two-stage archaeological condition comprising firstly of evaluation to clarify the nature and extent of surviving remains and followed, if necessary, by a full investigation.

	Officer response: The matter is addressed in the Archaeology section of the report.
Historic England (Inspector of Ancient Monuments)	HE has commented on designated heritage assets only. It has been noted that the development site sits close to the scheduled monument of Barnards Inn. The proposed development does not physically affect the Inn. However, Barnards Inn is encapsulated within a mass of more recent buildings, experiencing overshadowing. The proposed development would not compromise the setting of the Inn any further, although HE notes that care should be taken to ensure access to it remains easily navigated and signage is not impacted. As long as the application would not materially change, HE would not need to be re-consulted. **Officer response**: The proposed buildings' height and mass remained the same over the course of the application. Therefore, HE has not been re-consulted.
TfL (Infrastructure Protection)	TfL (Infrastructure Protection) has no objection to the proposed development in principle. The consultee has however set out a number of potential constraints linked to the proximity of the development site with London Underground railway infrastructure. A set of conditions have been recommended that require consultation with TfL Infrastructure Protection through submission and approval by the LPA. **Officer response**: Conditions are recommended.
TfL (Spatial Planning)	<u>Pedestrian Comfort</u> TfL (Spatial Planning) deems the pedestrian comfort levels submitted acceptable. <u>PT Impact</u> TfL suggests that wayfinding measures in the station would help people exiting the station more easily will help offset this impact (and improve their experience of the venue), as would wayfinding on the street to help people find the destination, and on return raise awareness of proximity to other destinations and public transport, improving their experience. <u>Cycle Parking</u> TfL advises that further work should be carried out to improve the long-stay cycle parking design and access. <u>Car Parking</u> Subject to both LPA's deeming the location and operation of the blue-badge bay being acceptable, TfL consider this

	appropriate. However, the applicant is encouraged to identify blue badge locations on the Camden access point. Taxi and Coach Access TfL requests for more clarity on how or if taxi's/ private hire vehicles would be restricted from accessing Furnival Street. They request a more robust coach management plan is provided. The TfL Coach team have highlighted that a current plan could lead to illegal parking on street which in turn would impact safety and operation of Holborn. It has been suggested that coaches could use Bedford Row as an official parking bay or consider the provision of a bay on northbound element of Kingsway. Further discussion on this element should be provided and the relevant review mechanisms in the travel plan and operational strategy should be put in place to allow amendments where deemed necessary. Delivery and Servicing TfL have concerns over the feasible operation of the Delivery and Servicing Plan particularly on Furnival Street and clarification is sought on how this will be managed. The final DSP should be secured by condition and should also consider when the needs of the occupier may change for special events etc. Construction Logistics TfL acknowledge the Outline Construction Logistics Plan, but has serious concerns over the proposed management, operation and feasibility of carrying out this plan. This should have the earliest engagement in order to provide suitable mitigation as this may impact pedestrian, bus operations and London Underground Infrastructure. TfL recommends that the access proposal is supported by a road safety audit, also that for pedestrian and cycle routing during construction, these should subject to detail assessment in accord with Construction Logistics and Community Safety standard and appropriate pedestrian comfort levels. The final Construction Logistics Plan should be provided in accordance with TfL guidance and discharged in consultation with TfL. Wayfinding A Wayfinding Strategy is recommended to be secured by condition. This should include updates to wider Legible London Signage and the provision of additional signage where appropriate on street and potentially within LU Stations. Travel Plan

	TfL welcome the provision of the revised travel plan which includes a range of soft and hard measures. Suggested additional measures which may form part of their travel plan could be the provision of a wayfinding strategy which would encourage people to walk from key transport nodes and to reduce pedestrian congestion in key locations. Another measure which could be included as part of the plan and/or upon review of the plans, could be to incorporate Santander Cycle Hire with tickets. TfL offer innovative ways to work with business to provide sustainable transport options such as this. Given the site is well served via cycle hire and cycling infrastructure, this could be a suitable option. <u>Operational Management Strategy</u> TfL advises that the applicant should provide an operational management plan which should be secured via condition. This should provide sufficient mechanisms and proposals which can be adapted once the venue is operational. <u>Dockless Bikes</u> TfL request the City of London and the LB of Camden work with the dockless bike providers to provide a no parking zone surrounding the access locations. Whilst this is not within the control of the future occupier, the reason behind this request is due to the constraint nature of the access points and potential implications of the bikes being in these inconvenient locations. <u>Cycle Hire</u> On this occasion TfL are not requesting a cycle hire contributions given the expect impact of the development will be outside of peak hours when the system experiences most pressure. However, measures mentioned above via the Travel Plan should be secured appropriately. **Officers response**: The comments are taken into consideration – the Transport and Highways section of this report addresses the above matters. Conditions have been recommended.
Thames Water	Thames Water has raised no objections and has requested conditions to be included to require a piling method statement. Thames Water advises that any significant work near their sewers must minimize the risk of damage. Works should be guided in accordance with the Thames Water ‘guide working near or diverting our pipes’.

	As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. They would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . With regard to the COMBINED WASTE WATER network infrastructure capacity, Thames Water would have no objection based on the information provided. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. They have requested an informative to be included to advise on the requirement for a Groundwater Risk Management Permit from Thames Water for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. They would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Thames Water would advise that with regard to water network infrastructure capacity, they would not have any objection to the above planning application and have requested to include an informative to advise that Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1

	bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains and have requested to include a condition for 'no construction shall take place within 5m of the water main.' The condition requests details of how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, to be submitted to the Local Planning Authority in consultation with Thames Water. Thames Water advises works have the potential to impact on local underground water utility infrastructure. They would like the developer to read their guide 'working near our assets' to ensure the works will be in line with the necessary processes the development needs to follow if considering working above or near Thames Water pipes or other structures. There are water mains crossing or close to the development. Thames Water do NOT permit the building over or construction within 3m of water mains. If the developer is planning significant works near Thames Water mains (within 3m), Thames Water will need to check that the development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services they provide in any other way. The applicant is advised to read Thames Water 'guide working near or diverting our pipes.' Thames Water has requested an informative to be included to advise that Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. **Officers response**: Conditions and informatives are recommended.
Environmental Agency	No comments – Environmental Agency has advised that the planning application is consulted upon with the Local Authority's Environmental Health department. **Officer response**: City of London Environmental Health team have been consulted on the proposed development.
Health & Wellbeing Policy	No comments to date.

Development Manager	
Lead Local Flood Authority	Conditions are recommended requiring further details of SuDs system and flood prevention measures. **Officer response**: Conditions are recommended.
Counter-Terrorism Security Advisor (CTSA)	CTSA has visited the site and read through the submitted Security Report. Separate advice has been provided to the applicant that does not require any planning conditions to be imposed, however, the applicant is advised to consult CTSA as the plans evolve. Details of the security measures for the site are confidential, and not available in the public domain. **Officer response**: An informative has been added.
City of London Police (Design Out Crime Officer)	City of London officers have been consulted and commented on their requirements for the external security of the venue and recommended alternative options/standards that would be of their satisfaction if adopted at the more detailed design stage. A comment was made about the constraint nature of the existing lifts at Fulwood Place for emergency services access. It has been clarified that the proposal seeks to enlarge the existing lifts increasing the capacity of people by 3 times which has been deemed acceptable at this stage. A point was made about the ability to close the tunnel system to afterhours drinkers in reference to the proposed bar in Camden. The agents have responded that the area outside of the bar will be physically locked off to prevent bar patrons getting access to any area outside of the bar space. CoL Police Officer has found this approach acceptable. They have noted that subject to any matters that the CTSA's may raise, they are satisfied with the response and the fact that other issues can be resolved at the detailed design stage. **Officer response**: An informative has been added to consult CoL Police at detailed design stage.
Conservation Area Advisory Committee (CAAC)	Officers presented the proposed scheme to the CAAC on the 15th of February 2024. No objections were raised with a formal non-objection letter submitted to the application on 1st of March 2024.
London Fire Brigade	<u>General fire safety design approach and consultation with key stakeholders</u> London Fire Brigade (LFB) understands that it is proposed that the methodology outlined in BS 7974:2019 will be applied and they support this approach. As part of this methodology, LFB advises that a Qualitative Design Review (QDR) process

	should be undertaken and LFB would expect to be involved in this process as a key stakeholder, both in their capacity as an emergency response agency for fires and other emergencies but also as the future enforcing authority for The Order. However, they emphasise that it cannot be assumed that following any particular methodology, in and of itself, automatically leads to acceptable solutions or outcomes. The detail of any risks identified, and decisions made, may need revision throughout the design and construction phases as previously unknown circumstances arise, and may not be easily or suitably resolved. LFB advise that caution is taken if applying the recommendations of BS 9992 to tunnels that do not form part of railway infrastructure, whilst some of the recommendations of the code of practice may be applicable, the assumptions made for sub-surface railway infrastructure in particular are quite different than those for other types of purpose group/occupancy. LFB expects – subject to the outcome of the performance-based design process and associated stakeholder engagement – that suitable smoke ventilation/control systems will be provided, in conjunction with suitable and compatible automatic fire suppression systems. <u>Critical fire safety design issues that LFB would expect to be addressed as the design is developed</u> LFB wish to highlight a number of fire safety design issues that we would expect to be addressed as the fire safety design process progresses. This is not intended to be exhaustive. - *Extended travel distances for occupant means of escape and firefighter access/intervention;* - *Inclusive design and means of escape for persons with relevant protected characteristics;* - *Radio communications coverage for firefighters and other emergency responders;* - *Electric Powered Personal Vehicles;* - *Construction phase fire safety.* LFB informs that it is not possible to advise if London Plan Policies D12 and D5 can be considered to have been met without assurances being sought that the design will progress in consultation with LFB and other emergency services. **Officer response**: Noted – these comments are addressed in the Fire Statement section of the report.
British Telecommunications	No comments to date.

City of Westminster	No objection.
London Borough of Camden	Duplicate planning applications have been submitted to the City of London and LB of Camden for the proposed development. LB of Camden has made no comments regarding the proposed works taking place within the City of London, however, their Committee Report recommendations form material considerations in the report's assessment.

Letters of Representation

Support

48. A total of 57 letters of support from the public have been received over the course of the planning application. Among them, there were two Business Improvement Districts, local residents and business owners, as well as people from around London, Britain and the globe. The topics of support for the proposed development have been summarised as follows:

- Embracing and preserving the history of the Kingsway Tunnels;
- Educational Opportunities providing visitors of all ages with opportunities to learn and engage through interactive exhibits, guided tours and educational workshops.
- Public-private partnerships, collaboration between public agencies, private investors and community organisations;
- Cultural Enrichment;
- Seven-day destination in line with City's destination vision;
- Revitalise/Boost the local economy with positive effect to businesses and communities;
- Facilitates post-pandemic recovery of the local area;
- Increase tourism;
- Potential to bring growth in the area;
- Creation of new jobs;
- Repurposing of existing redundant infrastructure;
- Provision of accessible spaces;
- Design and Sympathetic to its surroundings;
- Provision of innovative and attractive environments;
- Creation of a benchmark development;
- Help London to continue being perceived as a world-class city and adds to its competitiveness.

Central District Alliance

49. Officers received an email from the Central District Alliance (CDA), Business Improvement District comprising of Holborn, Clerkenwell, Farringdon, Bloomsbury, and St Gile, which informed they have submitted comments and a letter of support to Camden Council on the parts of the development which impact their footprint. CDA is supporting the proposed development coming forward, which consequently includes City's application, and the wider economic benefits it brings *'rejuvenation of local business, increased tourism, and educational engagement, projecting an economic uplift of £60-£80 million annually for the area*'. The letter of support refers to the proposed development as *'a significant opportunity for economic, cultural, and historical enrichment in our community'* and urges the LPA to recognise the '*transformative potential'* of the development to bring '*lasting benefits to their district, fostering a vibrant, culturally rich, and economically robust economy*'.

50. CDA's email states: "*The area of Holborn is well placed to guide visitors to and from main transport hubs located on the tri-borough boundary and to cater for footfall to and from the attraction. We are dedicated to see economic growth in this particular part of central London and welcome this as a new cultural venue in the area."*

Fleet Street Quarter

51. A comment was made by a representative of Fleet Street Quarter (FSQ), a BID with footprint in the western part of the City of London. FSQ recognises the need for a visitor attraction at this part of the City to create a destination to a part of London that has been suffering due to lack of competitive offer compared to other more prestigious attractions in London such as St Paul's Cathedral and Covent Garden. FSQ considers that the proposed cultural scheme would complement and support the needs of workers and along with the Museum of London they would *'put the area on the map'.* The anticipated number of visitors is welcomed by FSQ as it would strengthen the retail offer along Holborn and support other retail businesses in the area and boost the weekend economy to a much needed business district.

Objections

52. A total of 24 objections have been received over the course of the planning application including a letter of representation prepared by Daniel Watney consultants, on behalf of the neighbouring commercial occupiers at 10 Furnival Street (Chancery Exchange), comprising of transport (by Haskoning DHV) and daylight and sunlight (by Joel Michaels Reynolds) comments about the submitted information. Officers have fully reviewed all the objections and

selected key themes as summarised below. Some comments are referenced in full where necessary.

Table 6. List of objections and officer responses

Issues	Number of objections relating to this issue	Officer responses including paragraph of report where issues are addressed
Noise linked to demolition, construction of the proposed development (detrimental to residential and others amenity)	14	Impact on the amenity Transport and Highways
Noise/Disturbance linked to operation of the proposed development (detrimental to residential and others amenity) - main sources: increased footfall, external queuing, anti-social behaviours, operational traffic/servicing, hours of operation	16	Impact on the amenity Transport and Highways
Litter and dirt in the local area caused by increased footfall	2	Conditions have been recommended for the operational management of the development.
Noise linked to late evening activities and/or bar (detrimental to residential and others amenity)	4	Impact on the amenity
Vibration	2	Impact on the amenity
34-35 Furnival Street have flats extend under the private area of the pavement with vulnerable pavement lights	1	This comment is not clear. The proposed development shares no boundaries with No.34-35, flats on this address will be protected from works.
Incompatible with area's Character (residential/pedestrian character and Conservation Area)	8	Principle of cultural use Transport and Highways Accessibility Design and Heritage
Design/Visual Appearance & Heritage (negative impact on the conservation area and settings of historical buildings)	4	Design and Heritage
Increased traffic and congestion generated by the proposed development. Chancery Lane and	4	Transport and Highways

Holborn are characterised as already congested areas.		
Delivery/Servicing and parking, including taxi drop-offs, would be of high demand when the proposed development comes to operation which would impact traffic flow as cars would park outside the premises with long delays blocking the whole width of the street and causing stress to local network.	7	Transport and Highways
No provision for vehicle access by residents and businesses is apparent in the proposal. Loss of vehicle access would be a hardship and detrimental for residents and businesses who rely on service deliveries and building maintenance services.	1	Transport and Highways
Damages to the (conservation) local area mainly due to construction works	1	Transport and Highways
Loss of existing cycle lane	1	Transport and Highways
Blue Badge space would be lost with no additional spaces proposed	3	Transport and Highways
No on-site visitor cycle parking – proposed location at High Holborn central reserve would increase the barrier to pedestrian movement across the street.	1	Transport and Highways
Physical incapacity of Furnival St to accommodate development	8	Transport and Highways Accessibility
Impact of the proposed kerb build out along the site frontage to the surrounding area.	1	Transport and Highways
Human Safety - issues are connected with the proposed evacuation strategy, queuing on the streets and servicing vehicles at the same time along Furnival Street; and asbestos airborne particles	4	Transport and Highways Accessibility Proposed contamination conditions
Emergency services access	3	Transport and Highways Accessibility
Security and terrorism	2	Security and Statutory Consultation

Structural damage to adjoining properties	2	Party Wall Agreements do not fall under the legislative framework relevant to the assessment of planning applications. Nevertheless, Structural Assessments have been submitted that address the issue.
Daylight Sunlight impact on opposite commercial building at 10 Furnival Street (Chancery Exchange).	1	Daylight and Sunlight
Light Pollution	1	Light Pollution
Air Quality	3	Air Quality
Drainage and Ventilation	2	Sustainability
Precedent with respect to land use	2	Any future planning application would be assessed on its own merits and against the most up-to-date national, London and local plan policies.
Principle of Development: Land Use (loss of office and provision of conflicting uses to the local context)	2	Principle of development
Principle of Development: Bar	1	The proposed bar is located in LB Camden and will be accessed only via the secondary entrance in High Holborn. The relevant Local Planning Authority would be assessing the principle of the bar use against their own policies, however, pubic concerns would be shared with LB Camden officers.
Fire Safety (risk of explosion in pressurised areas)	2	Fire Statement
Waste Management (provision for further disposal; plans do not show access and refuse collection from below ground levels)	3	Waste Management
The development needs to be balanced against the interests of local residents and the preservation of the conservation area	1	Heritage and Design Human Rights Act 1998 The Public Sector Equality Duty (section 149 of the Equality Act 2010)

32 & 33 Furnival Street have listed cellars that run under the road and pavement areas along Furnival Street which could be damaged	1	It is acknowledge there are listed basements to 32 and 33. Officers would expect localised vaults under the pavement and road but would not expect these to extend beyond the immediate context and significantly along Furnival Street. Please also refer to Archaeology section and relevant conditions.
The proposal fails to convince that the area would benefit from such tourist attraction	1	Cultural Use and Cultural Strategy
The development would have a negative impact on the local economy and would be detrimental to the social fabric of the community.	1	Cultural Use and Cultural Strategy
Not preserving the historic environment/tunnels	3	Please refer to the Proposal, Cultural Use and Cultural Strategy. The proposed development seeks to preserve the heritage element and make it accessible.
Impact on keeping or finding new tenants	1	Not a material planning consideration.
Compliance with planning policies	2	Please refer to the assessment part of the report and the Conclusions. Officers have assessed the application against the adopted and emerging development plan policies.

53. It is noted that all material planning considerations raised in the representations above are addressed within this report.

Neutral

54. Three neutral comments have been received including one from a local businessman who supports the application and requests mitigation measures to be considered in relation to construction traffic, increase number of visitors leading to demand for parking and the preservation of the historic features in the tunnels. The second neutral comment requests to know more about the

expected noise levels of the concrete acoustic louvre. In both cases, relevant assessment has been undertaken and conditions have been recommended for further details and mitigation measures when deemed appropriate.

Policy Context

55. 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.

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 very limited weight and will not be referred to in this report. The draft City Plan 2040 was published for Regulation 19 consultation in April 2024 which is expected to end on 17th June 2024. It is anticipated that the draft City Plan 2040 will be submitted to the Secretary of State in Autumn 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The draft City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

57. Government Guidance is contained in the National Planning Policy Framework (NPPF) September 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.

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".

National Planning Policy Framework (NPPF)

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 48 states that "*local planning authorities may give weight to relevant policies in emerging plans according to:*
a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."

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

63. 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.

64. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

65. Paragraph 101 states that planning decisions should promote public safety and should take into account wider security and defence requirements by:
a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate… and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area."

66. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 states that *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a*

genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health".

67. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

68. Paragraph 117 states that "*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed*".

69. Chapter 11 of the NPPF seeks to achieve effective use of the land. Paragraph 123 advises that "*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*."

70. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 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*."

71. 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.

72. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

73. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

74. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

75. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

76. Paragraph 203 of the NPPF advises, "In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness."

77. Paragraph 205 of the NPPF advises "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*."

78. Paragraph 208 of the NPPF states "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*".

79. Paragraph 209 of the NPPF states "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

80. 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

81. 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 Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

Main Considerations

82. 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).

83. Account has to be taken of the documents accompanying the application, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.

84. The principal issues in considering this application are:
a) The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.

b) The principle of development and proposed uses.
c) The loss of office floorspace.
d) The impact of the proposed development on the amenity of nearby residential and other occupiers.
e) The impact of the proposal on public safety and security in the City.
f) The economic impact of the proposal.
g) The impact of the development on the character and appearance of the conservation area and the design of the building itself.
h) The impact of the development on designated and non-designated heritage assets.
i) The impact of the development on public realm.
j) The impact of the development on ecology.
k) The accessibility and inclusivity of the development.
l) The impact of the development on any potential archaeological assets beneath the site.
m) The impact of the development on highway and transportation terms.
n) The impact of the development in terms of energy, sustainability and climate change.
o) The impact of the development on air quality.
p) The impact of the development on health and wellbeing.
q) The impact of the development on fire safety.
r) The impact of the development on flood risk.
s) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010).
t) The Human Rights Act 1998.
u) The requirement of financial contributions and other planning obligations.

Principle of Development

85. The NPPF places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.

86. Paragraph 96 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places and provide social, recreational and cultural facilities and services the community needs.

87. The Local Plan Core Strategic Policy states that when considering development proposals, the City Corporation will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

88. 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.

89. 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.

90. London Plan Policy SD4 outlines that within the Central Activity Zones (CAZ) a mix of strategic functions and local uses should be promoted and enhanced. Cultural, arts, entertainment, night-time economy and tourism functions are some of these functions.

91. London Plan Policy D3 states that a site's capacity is optimised by a design-led approach that requires going through an optioneering process of the most appropriate form of development for the site considering its context and capacity for growth including its infrastructure capacity form and layout, experience and quality and character. Higher-density developments should be located in areas with well-connected jobs, services, infrastructure and public/sustainable transport.

92. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs.

93. Strategic Objective 3 in the City of London Local Plan 2015 is to promote a high-quality heritage environment with supporting and continued development of the City as a cultural destination. The Local Plan envisions the continuity of

cultural and leisure destinations in the City for workers, residents and visitors with equal opportunities, accessibility and involvement for everyone.

94. Strategic Objective 5 in the City of London Local Plan 2015 is to ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities, aiming for continuous improvement in the City's rating in satisfaction and quality of life surveys. The Local Plan seeks to ensure high quality training and learning opportunities are accessible to all. City and City fringe residents will develop the skills needed to enter careers in the City and benefit from the City's prosperity.

95. 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.

96. The Strategic priorities of the emerging City Plan 2040 also focus on maintaining and enhancing the City's cultural, leisure and recreational offer, visitor experiences and infrastructure and the City's evening and weekend economies to position the Square Mile as a key cultural and leisure destination. To do so the emerging policies seek to encourage cultural placemaking and creation of inclusive places contributing to residents, workers and visitors' experiences; develop cultural, leisure and recreation facilities that offer unique experiences across the City and during the whole day and week; protect and enhance existing areas of cultural significance; provide accessible and inclusive infrastructure and facilities that complement the cultural uses; place heritage ay the heart of cultural placemaking and create cultural offer that celebrates the City's rich history; and encourage public realm improvements to accommodate cultural events.

97. The above aims are reflected in the 'Destination City' vision for the future of the Square Mile as a world-leading destination for workers, visitors and residents. This initiative aims to create fun, inclusive and innovative spaces and places that attract people and investment to the City.

Loss of Office Floor Space

98. The proposed development seeks to repurpose the existing historic tunnels (formerly known as the Kingsway Tunnels) with the main focus being the provision of a large subterranean heritage exhibition space that would curate the history of the tunnels. The re-use of the tunnels coupled with high-end technology is proposed to provide a unique learning experience for the visitors along with the display of historic findings in a highly interactive environment.

99. A flexible exhibition space would also be provided in the tunnels with a temporary nature for various exhibitions to take place independently of the historic exhibition area, as well as the proposed repurposing of the historic bar.

100. As the main cultural spaces would be situated below ground. The development requires the formation of a ground level entrance that would be appropriate for this unique cultural use. There are currently two existing entry points to the tunnels. On Furnival Street (located within the City of London) the building at number 38-39 forms part of the historic tunnels, it offers 194sqm floorspace and currently houses a goods shaft that leads to the eastern part of the tunnels, forming one of the existing access points. A secondary existing access shaft to the tunnels is situated at 31-33 High Holborn (London Borough of Camden). This is located beneath residential and commercial accommodation and is accessed via a narrow alley. The latter access point has very limited flexibility given the constrained nature of the building/access and is therefore proposed to work as the secondary entrance to the tunnels development. Therefore, the principal visitor entrance is proposed to be located on Furnival Street.

101. The tunnels complex that runs along the City and Camden boundaries measures approximately 7,829 sqm in floorspace which would be restored and preserved. The proposed submission estimates that the cultural use would attract approximately two million visitors annually, with a maximum capacity of 750 people being in the tunnels at any hour of a peak day. Because of the capacity of visitors, the tunnels could accommodate, the building at 38-39 Furnival Street would not currently be able to provide a sufficient floor area for the required ground floor facilities (reception, lobby, toilets, etc) and for the provision of a highly accessible ground floor entrance on its own due to the constricted space. The proposal therefore includes the adjacent building, 40-41 Furnival Street, into the development in order to create larger floorplates and create the required primary access to the tunnels.

102. The following figure shows the existing ground floor layout of the two buildings to demonstrate the limitation in floor space at 38-39 Furnival Street and the additional floor area to be embedded from the inclusion of the adjacent building into the proposal.

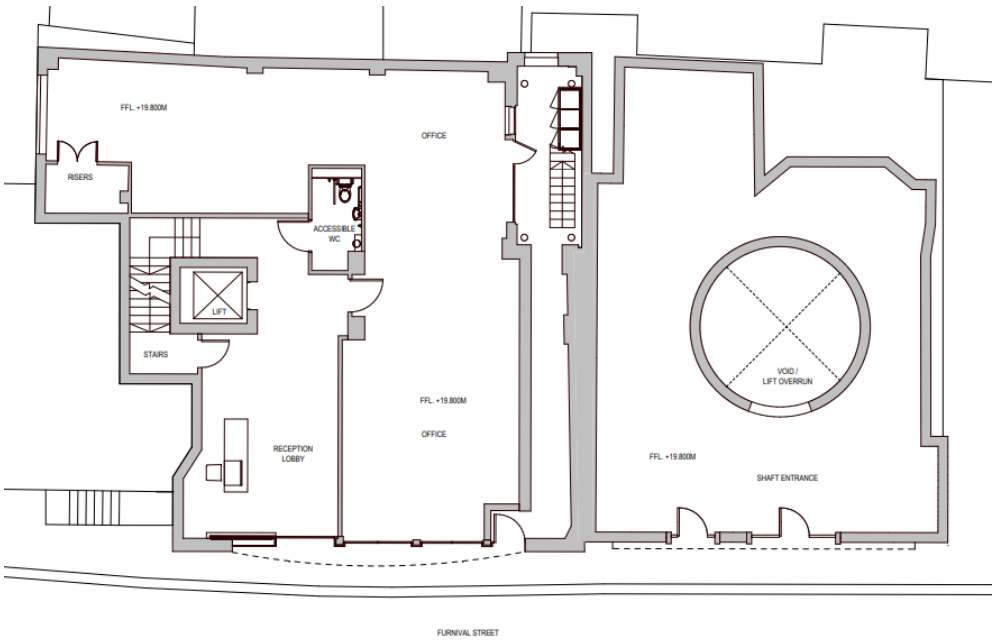


Figure 3. Existing Ground Floor Layout Plans

(40-41 Furnival Street left, 38-39 Furnival Street right)

103. No.40-41 Furnival Street forms a late 90s office building of higher scale than the other buildings on the street and is currently occupied. It offers 1,229 sqm (GIA) of office space and ancillary floorspace arranged over the basement, ground and 6 upper floors.

104. The proposed development seeks to demolish the buildings at both 38-39 and 40-41 Furnival Street and redevelop a building with a combined layout. The new conjoined building would provide ancillary uses (such as staff accommodation and gift shop) and form the principal entrance to the proposed cultural attraction to take place in the existing tunnels. This application would therefore result in the loss of 1,229sqm (GIA) of existing Class E(c) office floorspace.

105. London Plan Policy E1 supports the increase in current office stocks especially within the central London office market. The City of London Local Plan 2015 and the Emerging City Plan 2040 promote the delivery of a world class business city and the protection and provision of office floorspace. Local Plan policies CS1 and DM1.1 and Emerging City Plan 2040 policies S4 and OF2 seek to protect existing office accommodation.

106. Local Plan Strategic Policy CS1 and Policy DM 1.1, require applications for loss of office accommodation to other uses be refused where the site is suitable for

long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Inappropriate losses are measured by any the following reasons:

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

107. The supporting text (paragraph 3.1.8) to Local Plan Policy DM1.1 and the Office Use SPD indicates that proposals for the change from offices will normally be refused if the building or site is considered suitable for long-term viable office use. Paragraph 3.1.8 of Policy DM 1.1 however goes on to state that "*Exceptionally, the loss of individual office developments to other commercial or infrastructure uses may be acceptable, where the proposed alternative use meets the wider objectives of the Local Plan*".

108. Local Plan Policy DM1.3 promotes small to medium enterprises in the City and encourages the continued use of existing small and medium sized units which meet occupier needs.

109. Local Plan Policy DM1.5 promotes a mix of commercial uses in office developments that support the city's workers, residents, and enterprises while also adding to its economy and identity. Supporting text (paragraph 3.1.20) of the same policy defines complementary uses as retailing, leisure, education and health facilities and states these should support the prominent office environment of the City by providing supporting activities and services.

110. Emerging Policies S4 and OF2 of the draft City Plan require the protection of existing office stock from being lost to other uses where the existing floor space would be viable in the longer term or where the loss would cause harm to the primary business function of the City. Paragraph 6.3.9 of the emerging Policy OF2 states that when a change of use from offices to other complementary uses which meet the policy priorities of the City Plan is proposed, then a viability assessment may not be required. The paragraph continues to define complementary uses as those that meet the needs of City workers, residents and visitors and help make City buildings much more open and welcoming to all. The change of use of offices at ground and lower ground levels would also include the provision of improved vibrancy including active frontages and permeability. Sustainable development is also a priority to reduce carbon emissions and retain embodied carbon.

111. The Office Use Supplementary Planning Document (SPD) sets out the evidence required to support the loss of office floorspace. Paragraph 20 of the SPD states that when a change of use application provides complementary uses to the City's business function, the LPA may accept the development without the need to demonstrate the viability of the office site.

112. Emerging Policies S6 and CV2 promote opportunities for new cultural and leisure facilities offering unique experiences in the City's evening and weekend economies that support the City's role as a visitor destination. Policy CV2 also encourages the use of historic buildings for the provision of such uses that would contribute to the enjoyment, appreciation and understanding of the City's heritage in an inclusive, accessible and welcoming for all way.

113. The submitted evidence report for the proposed loss of office considers that the commercial building at 40-41 Furnival Street, due to its modest scale and location, makes very limited contribution towards the City's office stock and the primary business function of the City and would not have the potential for large office development in the future. However, officers acknowledge that the building is considered a viable office as it is currently occupied. Policy DM 1.3 (Small and medium sized business units) in particular encourages the continued use of existing small and medium size units that meet occupier needs. Despite the strong policy focus on larger office developments in strategic locations, having a variety of sizes and scales of offices within the City and in different areas is important for the business function of the City and its reputation as a global business centre as well as for attracting a diverse workforce.

114. The existing office, while occupied, is generally not of high quality or located within a building of particular architectural or historical merit. Given the dated and somewhat constricted layout of the existing building officers consider that there is likely a restriction on useability, limited sustainability measures and inadequate cycle storage or shower facilities. Following the global pandemic there is greater demand for cycling facilities and buildings with good air circulation which would therefore likely decrease the desirability of the building. It is therefore considered that the office would be a poor competitor to other buildings in better locations.

115. The proposed cultural and visitor use is considered to fall within the definition of a complementary use to the City's business function and proposes to offer a unique cultural experience in accordance with the Emerging Policies S6 and CV2. While limited Viability Assessment documentation has been submitted as part of the proposal, the loss of the modest office is to be weighed against the exceptional re-use of the adjoining heritage asset, the inherent requirement of

40-41 Furnival Street for access/ancillary space and the wider economic benefits the cultural use would bring to the City as a whole.

116. The tunnels have been identified as a non-designated heritage asset due to their historic value. Their retention and repurpose to provide a cultural exhibition space, that would be dedicated to being appreciated by visitors through a playful and joyful interactive learning experience, would be in line with Emerging Policy CV2. It is noted that the heritage benefits and repurposing of existing infrastructure have been identified in comments received from members of the public as a significant and unique benefit of the development.

117. The additional proposed floorspace by utilising 40-41 Furnival Street would achieve accessibility and fire safety standards by providing the necessary facilities at ground level such as better circulation space, an increased number of lift shafts, emergency exits and cycle storage as shown in the figure below, as well as creating ancillary areas at upper levels such as gift shop, staff accommodation and MEP storage.

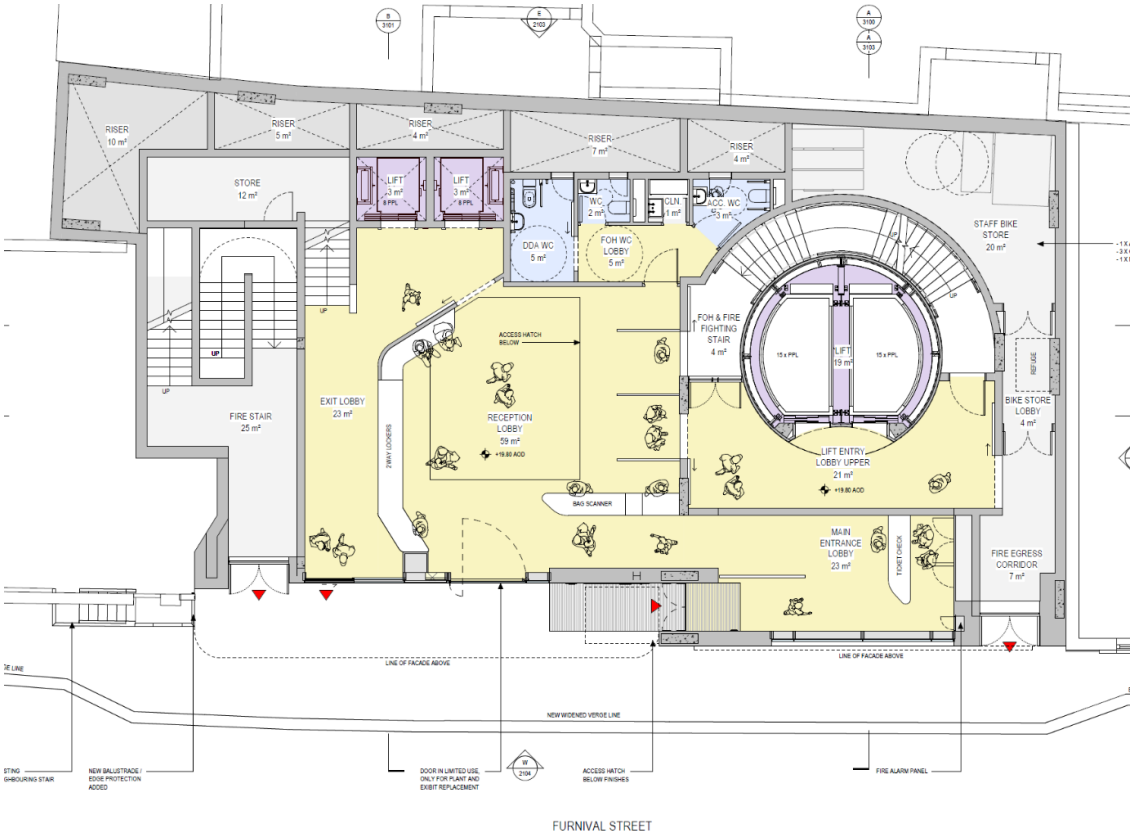


Figure 4. Proposed Ground Floor Plan 38-41 Furnival Street – combined floorspace

118. It is considered that the scheme would help create new jobs and significantly revitalise the local economy by attracting visitors every year outside working

hours, during evenings and weekends, meeting the strategic objectives of the City in order to sustain and complement its business function. Approximately 85 new full-time jobs are anticipated to be required to function the permanent exhibition space in addition to extra staff that would be needed for the special events space focusing on local recruitments. The proposed bar would operate separately and would therefore employ its own staff. The application has received 57 letters of support from the public the majority of which point out the benefits the development would bring to the local economy in an area that has suffered deprivation and fights to recover from the pandemic. Among them, Fleet Street Quarter strongly supports the introduction of a much needed visitor destination to this area. This would provide a transformative revitalisation of the High Holborn area and as such has also been supported by the Central District Alliance. Increased footfall by the development has been heavily supported on that basis.

119. The supporting text in Local Plan Policy DM1.1 (Protection of office accommodation) confirms that exceptional losses of individual office developments to other commercial or infrastructure uses may be acceptable, where the proposed alternative use meets the wider objectives of the Local Plan. The high-quality, unique cultural use will contribute towards diversifying the City's visitor infrastructure, adding vibrancy and activity for seven days per week and contribute significantly to the achievement of the City Corporation's Destination City ambitions and align with the City Corporation's wider ambitions for a post-Covid City. Furthermore, as highlighted above, the proposed use would bring about a wider economic benefit to the City, providing 85 (FTE) local jobs, up to 2 million visitors to the City per annum and the restoration of a heritage asset. In this case therefore, while the proposal would reduce the amount of potentially viable office space, the proposal is considered to fall within the 'exceptional' category of complimentary uses and as such acceptable in principle.

120. Whilst the Local Plan 2015 resists the loss of office floorspace, it is considered the scale of the loss on this site (1,229sqm) would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock for which there is demand or longer-term viable need.

121. Overall, whilst there would be a loss of existing office floorspace, this would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The proposed development would contribute to the support of the City's business function offering a unique experience for its workers, residents and visitors, and add a significant cultural supply to the City's stock meeting Destination City's aspirations. It is therefore identified as complementary use

that meets the wider objectives of the Local Plan in accordance with adopted Policies DM 1.1, DM 1.3, DM1.5 and emerging Policies OF2 and CV2. The loss of office floorspace at 40-41 Furnival Street is considered acceptable on that basis.

Cultural Use (Use Class F1 (b) (c))

122. The proposed development seeks to change the use of the existing Kingsway Tunnels to a cultural and visitor attraction (exhibition space), including a bar. The tunnels are not currently publicly accessible and are not in use.

123. The site falls within the CAZ and London Plan Policy SD4 outlines that within this area the unique concentration and diversity of cultural, arts and tourism functions should be promoted and enhanced.

124. The London Plan Good Growth objectives GG1 and GG5 are considered applicable to the provision of community and cultural use (Heritage and Cultural Exhibition) within development proposals.

125. London Plan Policy E10 states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

126. Policy S1 of the London Plan seeks to ensure that the social infrastructure needs of London's diverse communities are met.

127. Policy HC5 of the London Plan recognises that the continued growth and evolution of London's diverse cultural facilities and creative industries should be supported.

128. Local Plan Policy CS11 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. The supporting text for Policy DM11.1 goes on to state that the international reputation and high quality of this cultural activity are acknowledged as having a critical part to play in the vibrancy of the working environment of the City.

129. Emerging Strategic Policy S6 of the draft City Plan 2040 outlines that the City of London will support and encourage access to and development of a wide range of creative and cultural spaces and facilities across the City. Destination City, the City Corporation's flagship strategy, seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

130. Emerging Policy CV2 (Provision of Arts Culture and Visitor Facilities) of the Draft City Plan 2040 encourages the provision of facilities that meet the needs of visitors in new cultural developments. In particular by encouraging the provision of arts, culture and leisure facilities in historic buildings and spaces where this would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming and accessible for all.

131. A Cultural Plan has been prepared by Future City and submitted as part of the application which sets out the cultural vision, the development's offer, the delivery strategy and the future steps. The Plan envisages the activation of the existing tunnels infrastructure to provide cultural exhibition spaces and opportunities for programming and partnerships.

132. The proposals do not involve construction in the tunnels. The cultural mapping has been made following the tunnels layouts and based on the historical significance of each area. As mentioned earlier in the report, the tunnels were built in phases and were used for different purposes during historic times. The first phase (1942-1945) includes the construction of the 'Streets' that run parallel to each other accessed by the former Chancery Lane tube station at 31-33 High Holborn. No.38-39 Furnival Street was built to make way for a goods lift shaft. Originally built to serve as deep-level shelters but actually used for 'Citadel' accommodation housing telecommunications rooms where one of the first Trans-Atlantic calls were made. A plan of 'Chancery Lane Deep Tunnels' is shown below demonstrating the various government departments in 1944. This area is considered to hold the most important historic interest linked to World War II period.

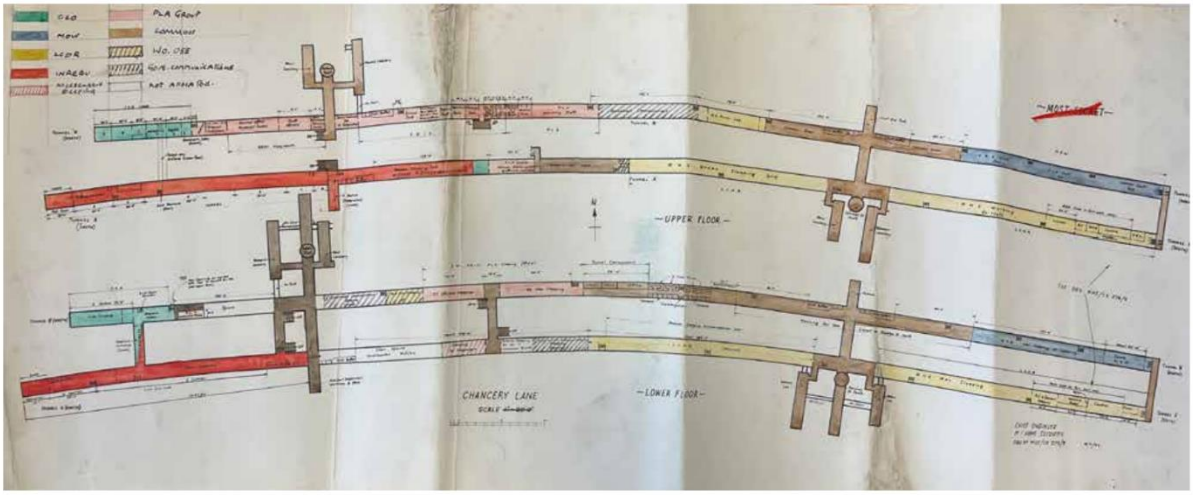


Figure 5. 'Chancery Lane Deep Tunnels' demonstrating the various government departments in 1944

133. The tunnels were converted in the early 1950s after the Post Office and British Telecom took their possession, which included the construction of four more tunnels, known as the 'Avenues', on a north-south axis, formed part of the wider expansion of Britain's domestic telecommunications network. This area is considered to be of secondary historic interest.

134. In some parts there are post-war plant and machinery remains associated with the function and running of the Kingsway Exchange tunnels.

135. The figure below is an extract of the Cultural Plan and shows the defined areas of the proposed cultural use within the tunnels.

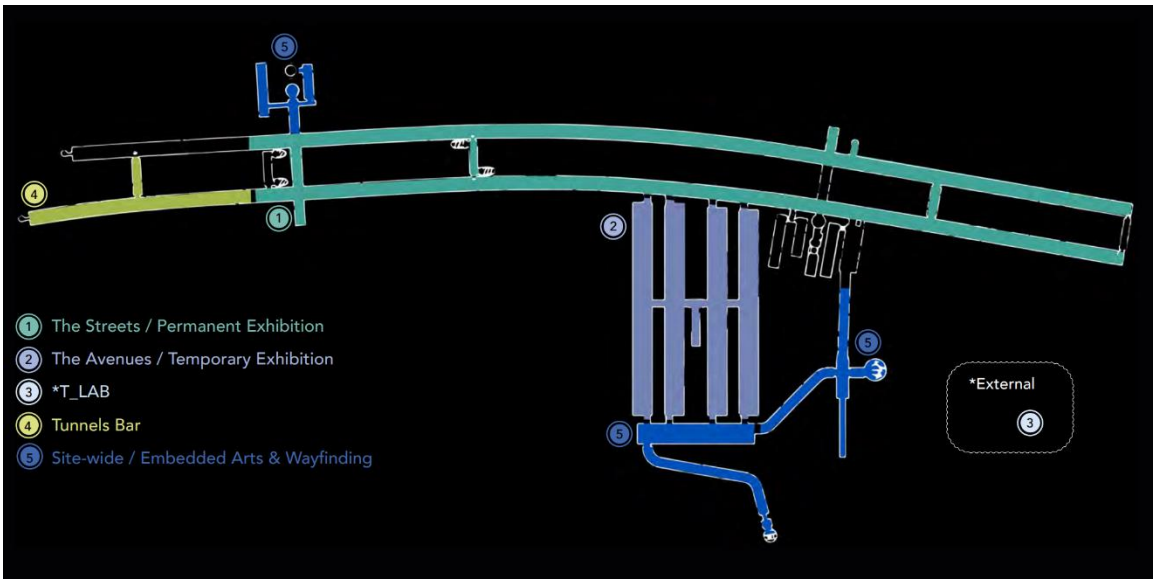


Figure 6. Cultural Plan – key showing areas in the tunnels

136. A History & Heritage experience would reside in the ‘Streets’ marked as the permanent exhibition space. The site has a historical significance dated to WWII and subsequent historic times which the proposed scheme seeks to embrace by repurposing the existing infrastructure and remains. This space would curate the history of the site through a historic timeline by displaying the retained and restored telecommunications equipment alongside other findings and historical assets, engaging visitors in their exploration. The narratives take place at the construction of the tunnels, in the 1940s, and go on to their influence on wider historical events in London including WWII and the Cold War in connection with the role of the tunnels during that timeline and their use as a telecommunications centre for British Telecom in the 1980s. Part of the Streets may be used for medium term exhibitions on associated themes such as James Bond, a theme deriving from Ian Fleming’s reference to the tunnels in his first book of the infamous UK secret agent.

137. The temporary/flexible Cultural Exhibition space would take place in the ‘Avenues’ and provide a ‘black box’ space, as mentioned in the Cultural Plan, which would offer an adaptable space for various cultural programmes. Technological support equipment, such as curved digital screens and interactive systems, could be installed to support future potential programmes.

138. The floorspace allocated for cultural uses is a total 3,713 sqm. The permanent Heritage Exhibition would reside 53% of that area leaving 47% to be covered by the flexible Cultural Exhibition.

139. The main entrance to both exhibition spaces would be at ground level through a new building at 38-41 Furnival Street. The ground floor serves as a check-in point and waiting area until the visitors are taken to the tunnels through a round lift shaft.

140. The following diagram shows the proposed indicative visitor route in the tunnels, starting from the lift shaft access point and following the heritage trail towards the ‘South’ and the ‘North’ ‘Streets’ and back to the access point. Similarly, a shorter indicative trail is marked for the temporary exhibition area in the three ‘Avenues’.

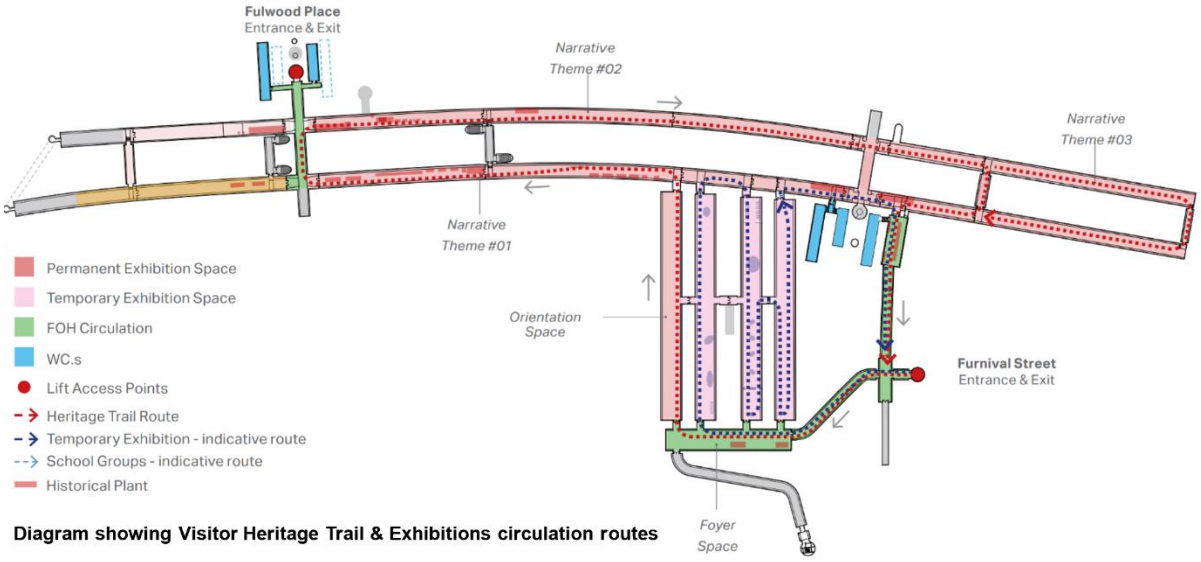


Figure 7. Diagram showing Visitor Heritage Trail & Exhibitions circulation routes

141. Almost the entirety of the development serves the cultural uses, including the upper floors of Furnival Street buildings which provide ancillary space for the cultural use. The first and second floors would be used for ancillary retail to house a gift shop. Level three would house MEP equipment serving the tunnels and level four would be used for staff accommodation offering ancillary office space, toilet facilities, lockers and outdoor amenity space.

142. A licensed bar would repurpose the original bar built by British Telecom in the 1980s retaining its historic elements. It is suggested to form part of the cultural experience within the tunnels, however, it would function independently from the permanent and temporary exhibition spaces and would be accessed via Fulwood Place, the secondary entrance located in the London Borough of Camden.

143. The proposed development seeks to provide a visitor and cultural attraction (Use Class F1(b)(c)) and bar (Sui Generis) within the existing vacant subterranean Kingsway Tunnels. The level of historical significance the tunnels hold is so unique that is considered unlikely to find another site of this nature that would have the potential to make a cultural offer equal to the one of the proposed development. The proposed provision of a culture and leisure facility within the various historic buildings and spaces would contribute to the enjoyment, appreciation and understanding of the City's heritage. It would maintain and enhance the City's contribution to London's world-class cultural status and would contribute significantly to the City's ambitions for Destination City and post-Covid recovery. The proposed facilities would not only contribute to ensuring the City becomes a key leisure destination for visitors but would

also maintain and enhance its position as a global business centre, by providing cultural/leisure experiences for people living and working in and around the Square Mile. The proposed permanent Heritage Experience would directly reference the historic tapestry of the City and the flexible exhibition spaces would provide a unique and distinctive space for cultural events within the Square Mile. Finally, the proposed uses would contribute to the balance and mix of uses in the immediate locality, which is comprised of commercial, educational, residential and office uses.

144. The Cultural Plan and Socio-Economic Assessment suggest that the proposed development aims to attract up to two million visitors annually, boosting national and international tourism, with an expectation to generate over 100 jobs and increase local expenditure. There is a series of benefits brought forward through the scheme that focus on inclusion and equal opportunities. These include free school visits, opportunities for local jobs and apprentices, training opportunities, providing spaces designed for a greater group of people, and co-curation / co-creation programmes to engage the local community in shaping the exhibition areas. The development scheme makes use of an existing infrastructure that would otherwise stay untapped. It does that by creating a space that focuses on their legacy and embraces their history in a unique way with a commitment to invest millions of pounds to deliver that vision.

145. It should be noted that during the application's public consultation, 57 letters of support have been received, strongly supporting the provision of a touristic attraction with the characteristics of the proposed scheme in an area that has been battling to recover from the pandemic. Notwithstanding that, none of the overall 24 letters of objection raised an objection to the retention and restoration of the existing historic tunnels.

146. A Section 106 obligation would be required to secure the provision of the proposed cultural spaces and public benefits brought forward, including a Cultural Implementation Strategy and Operational Management Plan, and securing a Cultural Operator or future Partners focusing on inclusive procurement programmes. Officers consider these obligations to be necessary for the delivery of the proposed cultural use.

147. The proposed cultural spaces would contribute to the cultural and community offer in this part of the City. The scheme would align with the City's ambitions and direction of travel set out in the recent Destination City which seeks to ensure that the City is a compelling, seven day a week destination. The proposed development is therefore considered to be compliant with London Plan Policies SD4, GG1, GG5, E10, HC5, Local Plan 2015 policies CS11, DM11.1 and Emerging City Plan 2040 policies S6 and CV2.

Conclusion of proposed uses

148. For the reason stated above, it is considered that the proposed development would contribute to the support of the City's business function offering a unique experience for its workers, residents and visitors, and add a significant cultural supply to the City's stock meeting Destination City's aspirations. There are key heritage and social benefits brought forward in the scheme and is considered to constitute a positive development that meets the aims of policies in the Local Plan and London Plan and meets key strategic objectives and emerging policies of the Draft City Plan 2040. The proposed development is therefore considered to be compliant with London Plan Policies SD4, GG1, GG5, E10, HC5, Local Plan 2015 policies CS11, DM11.1 and Emerging City Plan 2040 policies S6 and CV2.

Design and Heritage

Policy Context

149. The relevant local policies for consideration are DM3.2, CS10, DM10.1, DM10.3, DM10.4, DM10.8, CS11, CS12, DM12.1 and DM12.2 of the Local Plan policies and S8, DE2 of S11 of the emerging City Plan, and London Plan policies D3, D5, D8, HC1. HC5, HC6, GG2 and GG5.

Existing Site and Context

150. No.38-41 Furnival Street is located at the northern end of Furnival Street and within the Chancery Lane Conservation Area. The existing site is composed of two distinct buildings, No.40-41 is a modern office building and No.38-39 is an existing entrance to the Kingsway Tunnels and has been identified as a non-designated heritage asset due to its historic and rarity value.

151. Furnival Street is a narrow street which runs north-south connecting Cursitor Street and Holborn. The townscape of the locality is of a modest scale, Furnival Street is generally constructed of four and five-storey buildings with varied roofscapes. The scale and massing of 39-41 Furnival Street sit comfortably into the existing streetscape however although 38-39 Furnival Street is slightly smaller in scale than the surrounding buildings. The architecture and appearance of Furnival Street is a narrow enclosed street and dominated by the use of brick and uniform gridded façades and a fine urban grain. No.38-39 is a positive and unusual contrast to the surrounding buildings, its simple industrial brick façade hinting to the wider tunnel network below ground. The architecture of No.40-41 dating from the 1990s is less successful due to the dominating glazed bow frontage which breaks the uniformity of the streetscape.

152. The existing ground floor frontages have little street presence. At No.40-41 the frontage is formed by an office lobby which has a lack of façade articulation and limited street activation. No.38-39 is dominated by black-painted solid doors. Overall, the buildings underperform for a streetscape which is characterised by numerous openings and high levels of articulation.

Height/Bulk and Massing of No.38-41 Furnival Street

153. The disposition of the finial massing and bulk has followed a design-led approach considering local townscape views, daylight assessment and relationship with neighbouring buildings and access requirements to the underground network. The massing and façade design has also been designed around the delivery of optimal microclimatic conditions, including daylight, sunlight and overshadowing to the building and its neighbours. With respect to massing, height and façade treatment, the development would demolish the entirety of No.38-39 and No.40-41 Furnival Street, and the proposed massing and height of the new structures would largely recreate the existing building proportions. The proposal would retain the appearance of two buildings, maintaining the urban grain of the East side of Furnival Street. The changes in height would be imperceptible and only experienced in oblique views.

154. The proposal would be formed of three levels of basement covering the extent of the site. The proposed massing of No.38-39 would use the full extent of the site and would slightly increase in height to accommodate ground plus three storeys with a rooftop amenity, increasing the overall height by 3.4m. The balustrading for the rooftop amenity would be set in from the main building façade reducing its visual impact in the oblique views along Furnival Street, the top height of the balustrading would be +36.10m AOD. The proposed massing of No.40-41 would be formed of four storeys above ground plus a setback plant enclosure at roof level, reaching +41.75m AOD. The massing would use the full extent of the site footprint however it would be set back at the ground floor to allow for a covered canopy over the entrance. Widening the public realm around the entrance would reduce the impact of the increased footfall associated with the new visitor attraction. The massing at the rear of No.38-41 has been designed to ensure its visual impact on the neighbouring building has been minimised by sloping the massing in the middle of the proposal from level 03 and above.

155. The proposal would positively address the street by introducing curved corners to the body of the building reducing the visual appearance of the currently unsuccessful blank flank wall which is visible in local townscape views looking north and south down Furnival Street. The proposed massing would improve

these townscape views by reducing the furthest extent of the massing into the street by 300mm and pulling the building line back at the ground floor to align with No.14-18 Holborn.

Architecture and Materiality of No.38-41 Furnival Street

156. The primary frontage of No.40-41 would be a bold addition to the townscape. The architectural treatment would express the new function of the building while maintaining the traditional proportions of the street through its expression of base, middle and top. While the façade of No.38-39 would reimagine the existing brick façade celebrating the unique history of the site.

157. The proposal allows for a connected single internal floorplate to be achieved without the disconnected inflexibility of joining the existing buildings. The two blocks would read as distinct but connected buildings, tied together by a consistent ground floor frontage and industrial architectural language and materiality.

158. The development would transform the existing ground floor experience to Furnival Street introducing a defined, active base of a human scale expressed as a single height with a recessed covered entrance associated with the main entrance. The site is constrained with limited frontage and through a design-led approach the proposal has provided a high level of activation alongside providing the required servicing entrance and fire escapes. The activation is created through increased levels of glazing and the primary use of the ground floor as the entrance to the tunnels. The servicing doors would be integrated into the façade minimising their impact on the appearance of the building in line with Local Plan policy DM10.1 and emerging City Plan 2040 policy DE2.

159. The primary entrance would be distinctive, and publicly located parallel to the street within the 1500mm setback. The soffit treatment, of textured reflective stainless steel would run from outside into the internal reception creating a welcoming and visually interesting primary entrance. The entrance including the soffit treatment would be designed to ensure that the highest standards of accessibility and inclusivity are achieved in line with Local Plan policy DM10.8 and emerging City Plan 2040 policy DE2. The detailed design would be secured via condition.

160. Materiality has been a central consideration. The building would have a high-quality industrial appearance, with the rebuilding of the brick façade at No.38-39 and the use of glass blocks at No.40-41. The materiality has been developed to celebrate the history of the site while also providing a high level of natural light into the building, creating a transition point for visitors between the subterranean tunnels and the outside. The proposed materiality including

colour, design details and intricacies would be secured through conditions including samples and bays studies.

161. The use of basalt cladding across the base of No.38-41 would provide a consistent language across the two buildings and ensure that a high-quality finish is achieved while ensuring that there is sufficient robustness for a primary entrance with sufficient footfall.

162. The upper storeys of No.38-39 Furnival Street would celebrate the existing building located on the site maintaining the unique industrial language by reinstating the existing brick façade and incorporating the existing concrete ventilation panel. The brick façade would be framed with black louvred panels which would be setback from the brick elevation by 400mm creating a clear hierarchy to the façade. No.38-39 originally had a metal crane, which has been lost a would be replicated and reinstated.

163. The upper floors of No.40-41 would be characterised by the bold, simple and elegant glass block four-storey façade, a modern interpretation of the industrial language found at the existing No.38-39 Furnival Street. The glass block façade was developed following an extensive pre-application process which looked to balance the need to provide a high level of ventilation to the third-floor plant space alongside providing adequate light levels to the ancillary office floor on level 04. The bold façade would provide visual interest and express the public uses without being overwhelming. The surrounding townscape is of a varied character and the independence of the architectural approach and materiality would add to the surrounding character.

164. The top floor of the No.38-39 would be the rooftop amenity for the tunnel's supporting workforce. The balustrading would be set back from the façade line reducing the visual impact on local townscape views. The terrace has been designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. The balustrading of the terraces would be a minimum of 1.4m high and have a planted buffer zone located in front of the balustrading line, creating a natural deterrent. Further detail regarding suicide prevention would be secured via condition.

165. The outdoor amenity and urban greening of the terrace would provide visual and physical amenity for the tunnel workforce supporting their mental health and wellbeing in line with Local Plan policy DM10.3 and emerging City Plan 2040 policy DE2.

166. The glass block façade of No.40-41 Furnival would accommodate integrated removable façade panels to allow for plant replacement in line with Local Plan

policy DM10.1 and emerging City Plan 2040 policy DE2. The junction detailing and materiality would be secured by condition.

167. The roof top plant equipment and lift overruns would be screened by the plant screen which is set back from the façade line reducing its visual impact on local townscape views. The proposed plant and building services equipment would be fully screened from view and integrated into the design of the building in line with Local Plan policy DM 10.1, greening would be optimised where possible in line with Local Plan Policy DM10.2 and emerging City Plan 2040 policy DE2. Further details are required and would be secured via condition including the 5th elevation.

168. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night. Irrespective of the approved drawings, a detailed Lighting Strategy would be subject to conditions to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low-level illumination to architectural features, to enhance the pedestrian experience, improve safety and protect the existing surrounding residential amenity.

169. Cycle parking facilities for the Tunnel workforce would be accessed via an entrance on Furnival Street. The short-stay cycle parking would be provided in public realm. The active edges would improve the pedestrian experience and cycle facilities would encourage active travel walking and cycling. The proposals are acceptable and allow for active travel and comply with Local Plan policy DM10.1 and emerging City Plan 2040 DE2.

170. Irrespective of the approved drawings, full details of the ground floor frontages, design and materiality of the public realm improvements, and wayfinding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment.

171. A high-quality signage strategy and way finding for the proposal would be required and would be secured via condition.

<u>Conclusion of Architecture and Massing of No.38-41 Furnival Street</u>

172. The proposals would successfully integrate into the modest scale of Furnival Street and would significantly enhance the streetscape by providing increased active frontage. The distinctive sense of separate buildings, materials, the celebration of industrial heritage and intended quality would introduce a well-considered, refined, neighbourly architectural set piece. The bold architectural expression would reflect the unique cultural use of the buildings and the subterrane tunnel network. The development is sensitive to townscape contexts at macro and local scales. The proposal would optimise the use of land, whilst significantly improving the buildings' interface with their surroundings.

173. The development would create a high-quality culture-led commercial development utilising the existing heritage of the site. The proposals align with Local Plan Policies CS10, CS11 and CS12, Emerging City Plan 2040 Policy DE2 and London Plan Polices D3, D5, HC5 and HC6. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG2 specifically GG2E: understand 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 and GG5 specifically GG5F: promote and support London's rich heritage and cultural assets, and its role as a 24-hour city. The proposals would also align with the mandate of Destination City by supporting London as a 24-hour city and creating a new cultural offering in this corner of the City of London

174. An informative for architect retention is proposed.

175. Overall, the proposals accord with the City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021).

176. The proposals are in overall general conformity with Local Plan Strategic Policies CS10 (Design), London Plan Policies D3/D8 and emerging City Plan 2040 Strategic Policy S8 (Design).

Heritage Impacts

Direct Impacts Chancery Lane Conservation Area

Significance:

177. The Chancery Lane Conservation Area and its buildings contain considerable historic character and appearance to convey the area's historical ethos through their variety and quality.

178. The characteristics which contribute to the special interest of the Chancery Lane Conservation Area can be summarised as follows:
- An exceptional span of building ages and styles, resulting in a townscape of arresting contrasts;
- Significant historic associations with the legal profession, with origins as a centre for medieval legal administration;
- The collegiate surroundings of Staple Inn and Barnard's Inn, which incorporate rare secular medieval survivals;
- A historic association with educational establishments that has persisted to the present time (e.g. the Inns of Court, Birkbeck College, King's College London);
- The site of the Knights Templars' first precinct and church in London (at Southampton Buildings);
- A well-preserved and easily legible historic street network;
- Monumental 19th century Victorian public buildings in a range of styles;
- One important early act of conservation (Staple Inn north range) and several buildings of varying periods associated with a single company's patronage (Prudential Assurance Co.);
- Well-considered 21st century insertions into a historic context.

179. No.38-39 is located adjacent to No.35 and No.36-37 which both offer examples of 20th century executions of traditional forms. It is seen to have a positive contribution to the conservation area and is noted within the CA Character Summary and Management Strategy SPD as offering a strikingly industrial aesthetic to the street, contrasting with the refined architecture of No.10 opposite. The key features which contribute to the industrial aesthetic as the plain brick elevation, iron crane and large ventilation grille.

180. The character of No.40-41 is out of keeping with the prevailing architectural aesthetic of Furnival Street due to its large bow front and is not deemed to be a positive contributor to the conservation area.

Direct Impact:

181. It is noted that a number of objections have been raised regarding the impacted of the proposal on the character of the Chancery Lane Conservation Area however this is in contradiction with officers Appraisal and further discussion regarding the impact of the proposals is set out below.

182. No objection from Historic England or Conservation Area Advisory Committee (CAAC) have been raised regarding the impact on the Conservation Area.

183. No.38-39 has been identified as having a positive contribution to the conservation area due to its industrial past and appearance and historic associations as citadel accommodation. Due to the narrow grain of the street, it is acknowledged that it is primarily the front façade of No.38-39 which provides the positive contribution to the conservation area. The proposed works at No.38-39 would comply with Local Plan policy DM12.2 and emerging City Plan 2040 policy HE1 as the positive contributors of the existing building would be reinstated within the proposed works, specifically the brick façade, concrete grille and reconstruction of the metal crane.

184. No.40-41 Furnival Street would be replaced by a high-quality glass block façade which would follow the existing datums set by No.14-18 Holborn. The architectural language would create a modern industrial aesthetic at No.40-41, emphasising the unknown heritage asset at No.38-39 and would create a positive addition to the streetscape. Adding to the existing key characteristic of the conservation through further addition of contrast and well-considered 21st century insertions in line with Local Plan Policy DM12.2.

185. The view down Furnival Street from Holborn is currently framed by the high-quality façade of No.10 Furnival Street and the blank red brick flank wall of No.40 Furnival Street. The proposed works would make a positive contribution to this view due to the activation of the flank elevation which would be achieved through the introduction of curved corners and the continuity of the materiality around corners.

186. The site appears in one local townscape view which has been highlighted in the Chancery Lane CA Character Summary & Management Strategy SPD as having a strong contribution to the character of the conservation area, the view is taken from the junction of Cursitor Street looking north along Furnival Street. The existing view is characterised by buff brick buildings to the west and a mixture of red brick and stone to the east, terminating the street is the Grade II* Prudential Assurance Building. The view would remain largely unchanged due to the site being located at a significant distance, however, due to the change in the façade line at No.40-41 Furnival Street the view would be opened up to allow further appreciation of Prudential Assurance Building.

187. Where the proposal would be visible from higher level windows, officers are satisfied that the designs would be of high quality, due to its materiality and greening, providing a high level of architectural and visual interest.

188. On balance, there is sufficient quality within the architecture of the proposal, to consider the impact on local townscape is acceptable, given that proposals are of high quality and suitable massing which would be well articulated, and would respond to its local context forming part of an interesting, varied, streetscape

along Furnival Street. The proposal would result in total demolition of No.38-41 Furnival Street however this would be mitigated by the reinstatement of the brick façade, concrete grill and metal crane at No.38-39, which would successfully promote the industrial heritage of the site.

Direct Impacts - Non-Designated Heritage Asset

189. 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 heritage assets. The guidance in Historic England's Advice Note 7: Local Heritage Listing has been used to assess whether the buildings on the site have the potential for non-designated heritage asset status. The Kingsway Exchange Tunnels were identified to have such status as a result of that scoping exercise.

Kingsway Exchange Tunnels

Significance:

190. Asset Type and Rarity: Only eight deep-level tunnels were built as part of the air shelter programme and the majority of these are located in predominantly residential areas, except for Chancery Lane and Goodge Street which are located in predominantly commercial and institutional areas of central London. The entrance located at No.38-39 Furnival Street is a rare example of industrial architecture in the City of London, this is represented in the simple brick façade with concrete ventilation panels and the metal crane which has been lost.

191. Age: The Kingsway Exchange Tunnels were completed in 1942 alongside the entrance at Fulwood Place and the entrance at No.38-39 Furnival Street was completed later in 1952. The age of the building does not relate to established local characteristics or building traditions and does not contribute to the interest of the Kingsway Tunnels.

192. Architectural and Artistic Interest: The tunnels network was constructed in a similar way to the underground train network and is of a standard construction methods. The purpose-built entrance at No.38-39 Furnival Street has a utilitarian façade which is indicative of its function while its materiality helps contextualise it into the surrounding streetscape. The intrinsic design and aesthetic value of the heritage asset do not relate to the local vernacular and the materials and construction where standard for the time period. The Kingsway Tunnels do not have any intrinsic architectural or artistic interest.

193. Group Value: The Kingsway Tunnels does not have any clear design relationship with the surrounding development, with the majority of the asset hidden underground. The above ground structure at No.38-39 Furnival Street is part of the 20th century piecemeal contemporary transformation of Holborn Kingsway Tunnels does not have any group value with the surrounding development.

194. Archaeological Interest: The building does not provide evidence of past human activity in the locality and below ground archaeology is considered in detail in the next section of the report.

195. Historic Interest: The Kingsway Exchange Tunnels were completed in 1942 and originated as the Chancery Lane deep-level shelter one of eight deep-level air raid shelters constructed during the Second World War to provide shelter to Londoners during aerial bombing attacks. The structure and arrangement of the Chancery Lane deep-level shelter was standard compared to the other seven constructed. It comprises two principal tunnels, which run in parallel and are connected by cross passages. The Chancery Lane deep-level shelter was never used for civilian shelter and was instead converted to 'Citadel' accommodation in 1944. At this time the tunnels were adapted to accommodate a reserve government headquarters in case of invasion or equivalent emergency. In 1949 the General Post Office took over the tunnels for use as a telephone exchange and works began at the beginning of the 1950s, in complete secrecy under emergency powers, to extend the tunnels through the construction of four large-diameter north-south tunnels, known as the avenues, these were built to house the automatic switching equipment. It was at this time that the building and goods lift at 38-39 Furnival Street was constructed. Its historical uses, although no longer the building's current use, adds to the historic significance of the tunnels. The subterranean network of tunnels still retains many features associated with their use as a citadel accommodation and subsequent telephone exchange including a canteen, bar, sleeping chambers and mechanical equipment. The site was also the location of the UK's termination point for TAT-1, the first transatlantic telephone cable in 1956. Which acted as the 'hotline' between Washington and Moscow during the Cuban Missile Crisis. The country's first radio paging terminal was also installed on this site in the 1970s. The Kingsway Tunnels have significant historic value.

196. Landmark Status: There are no identifiable communal or especially striking aesthetic values which make the Kingsway Tunnels stand out in the local scene as much of the asset is formed of subterrane tunnels with limited above ground presence. The architecture of No.38-39 Furnival was purposely designed to be unobtrusive and recessive, so it is not considered to possess landmark status.

197. The Kingsway Exchange Tunnels have been identified as a non-designated heritage asset, and the significance of the Kingsway Exchange Tunnels primarily arises from its rarity and historic interest as a deep-level air raid shelter, citadel accommodation and telephone exchange. The above-ground entrance elements are minimal parts of this much larger complex and are not representative of the extensive subterranean space and are of limited interest. The rarity and historic interest are primarily associated with the subterranean tunnel network.

Impact:

198. The proposal, as described previously, would result in the loss of some historic fabric, and changes to the above-ground structures at 30-33 High Holborn and total demolition of No.38-39 Furnival Street to be replaced by a reconstructed brick façade with additional massing and an increase in overall height.

199. The proposals would result in a demolition of historic fabric to No.38-39 Furnival Street, with the complete demolition of the above-ground structure and the widening of the goods lift. The new proposal would dismantle the existing brick façade and concrete vent and reintegrate them into the new façade. The original crane which has been lost would be reinstated. The proposal would create a modern reinterpretation of the existing building and the industrial identity of the building would be maintained and emphasised by the new building at No.40-41 Furnival Street. The works would comply with best practice guidelines regarding cleaning and deconstruction and a complete methodology would be secured via condition.

200. The works to the subterranean tunnel network would result in a minor loss and alteration to the historic fabric associated with the refurbishment works. The works associated with tunnels structures would be minimal and primarily associated with the remove of the asbestos and works to the access shafts which is required to ensure safe and inclusive access down into the tunnels. The form and structure of the tunnels would be maintained, and key features of the tunnels would be retained including the reinstatement of the deepest bar in UK and creating a permanent exhibition with the surviving telecom's equipment, including the trunk exchange, generators and main distribution frame. The proposed works would allow for the tunnel network to be opened up to the public and allow for this currently unknown heritage asset to be enjoyed by a wide public audience.

201. The proposed works to the Kingsway tunnels have been considered in line with paragraph 209 of the NPPF regarding the harm or loss of a non-designated heritage asset. The demolition of No.38-39 Furnival Street and reconstruction of the brick façade would result in loss of part of the non-designated heritage

asset but on balance this would not diminish the overall significance of the heritage asset due to limited level of demolition in regard to the entire network of tunnels, and the continued expression of the tunnels above ground through the use of simple industrial architecture. Overall, officers consider that the proposed designs for the Kingsway Tunnels would improve the accessibility and visibility of this currently unknown heritage asset to a wide public audience without distracting from its historical and rarity value in line with London Plan Policy HC1, Local Plan Policy CS12 and Emerging City Plan 2040 Policy S11.

202. In line with paragraph 210 of the NPPF, a condition is recommended to be secured via Section 106, requiring a Cultural Operator to be secured prior to any demolition works. Officers consider this as a necessary condition to ensure the partial loss of the non-designated heritage asset would occur only when the operation of the proposed cultural development would be secured.

Indirect Impacts:

No.25 Southampton Buildings - Grade II*

Significance:

203. Library and Offices of 1890-1912 by the Office of Works' principal architect, Sir John Taylor. The present complex also incorporates three bays of the elevation of an earlier structure, Staple Inn Chambers, which was designed and built in 1842-43 for the Taxing Masters in Chancery by the London-based architects Wigg and Pownall. Architecturally the buildings are of considerable interest: the complex is formed of six distinct blocks with different architectural treatments. The principal architectural interest of the building lies in the surviving interior spaces, such as the atrium Reading Room with two gallery floors with decorative ironwork and Corinthian columns. Further interest is derived from the building facades which display handsome Victorian and Edwardian architectural detailing. The Furnival Street and Southampton Buildings façades are particularly elaborate in their architectural detailing and make a positive contribution to the historic commercial character of Holborn. Significant historic interest is also derived from its function as the reading room and offices for the Patent Office, a government body established in 1852 to grant patents, trademarks and design rights.

Contribution of Setting:

204. The buildings are located within a dense network of narrow streets and squares with frontages to Furnival Street, Took's Court, Southampton Buildings and the gardens associated with the listed Staple Inn Building. The surrounding area is

characterised by large institutional and commercial premises, such as the Inn of Court and the setting contributes to the understanding of its historical interest as a Patent Office and Library. In the 19th century the commercial character of the area developed with the construction of large-scale office buildings with impressive street frontages. This is illustrated by the former Patent Office, the Public Record Office to the south on Chancery Lane (also by Sir Henry Tanner) and the Prudential Assurance offices to the north on High Holborn. There has been piecemeal redevelopment throughout Furnival Street and the surrounding area that has eroded the historic character of the area; however, these are generally respectful in scale and function.

Impact:

205. No.38-41 Furnival Street is located to the west of the former Patent Office on the opposing side of Furnival Street, the proposals would amount to change in a neutral element of its setting. The proposals would be seen together in the kinetic experience of Furnival Street however both would only be glimpsed in oblique views. The changes to the façade line of No 40-41 would pull the massing away from the listed building. Coupled with the setting back of the upper level of No.40-41, the overall effect would be a distinctive and deferential new volume that would not appear to dominate the listed building or challenge it in these views. Accordingly, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

Prudential Assurance Building- Grade II*

Significance:

206. The office building was constructed between 1885 and 1901 to designs by Alfred Waterhouse. In 1930-32, the building was altered and extended by EM Joseph. The building is Gothic Revival in style and constructed in a distinct combination of granite, red brick and red terracotta. The building occupies an entire urban block within Waterhouse Square, with its principal façade to High Holborn. The building has a complex floor plan with an interconnected series of courtyards within the block. The Prudential offices occupy the former site of Furnival's Inn, one of Holborn's Inns of Court, demolished in 1897.

207. The office building has a historical interest as the headquarters of the Prudential Assurance, Investment and Loan Association, founded in 1848. The building was extended over several years and designed to reflect the prestige of the company. The building has further associations with architect Alfred Waterhouse, who was responsible for well-known works such as the Natural History Museum and Eaton Hall. The architectural interest of the building derives from its imposing street presence on High Holborn and its high level of

Gothic detailing. The building is a fine example of purpose-built commercial office architecture, designed to reflect the values of the company it housed. The building has strong national associations with other Prudential Assurance offices, demonstrating a national company identity.

Contribution of setting:

208. The setting of the Prudential Office building contributes positively to its significance in its visual and spatial relationship with other large commercial and institutional sites on and around High Holborn. The Prudential Office building holds a prominent position on Holborn and the primary façade can be appreciated in its entirety. There are fragments of the historic streetscape that once characterised this commercial centre on the south side of High Holborn, which contribute to an understanding of the development of Holborn in the late 19th century. To the east and west of the listed building, there is modern commercial development of a contrasting style and materiality, which detract from the architectural and historic interest of the building.

Impact:

209. There is minimal intervisibility between the listed building and No.38-41 Furnival Street. The proposals would be seen in views of the listed building looking north along Furnival Street, this would be a kinetic experience and the proposal would only be glimpsed in oblique views. The changes to the façade line of No.40-41 would pull the massing back and open up the view towards the listed building. Coupled with the setting back of the upper level of No.40-41 would be a distinctive and deferential new volume that would not appear to dominate the listed building or challenge it in these views. The site is a peripheral element in the wider setting of the building and the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

<u>No.32 & 33 Furnival Street – Grade II</u>

Significance:

210. A pair of early 18th century townhouses of three to four storeys over basement. The buildings are typically Georgian in style and proportion, with architrave windows, string courses, parapet roofline and door-hoods. The buildings have architectural interest as a rare example of 18th century domestic development in central London. The buildings have historic interest as an illustration of the history of Holborn which developed as a residential suburb to the city before it declined in popularity in the 19th century and became predominantly institutional and commercial in character. The townhouses derive group value from one another through their historic and visual association.

Contribution of setting:

211. The setting of the townhouses contributes positively to their interest, located in the identifiable historic street pattern of Furnival Street and the surrounding area, and the visual relationship with No. 10 on the opposite side of Furnival Street. Furnival Street has undergone piecemeal redevelopment, meaning that the neighbouring buildings to the listed townhouses are modern constructions. These vary in architectural quality but overall respect the narrow plot size of the historic development.

Impact:

212. No.38-41 Furnival Street is separated from the listed buildings by intervening development. They share a wider visual relationship in the kinetic experience of views looking north or south along Furnival Street however both would only be glimpsed in oblique views. Accordingly, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

Indirect Impacts Chancery Lane Conservation Area

Significance:

213. The significance of the Conservation Area lies in its historic association with the legal profession and educational establishments that have persisted to the present time, Inns of Court, Birkbeck College, King's College London. The architectural character of the conservation area covers an exceptional span of ages and styles resulting in a townscape of arresting contrast. The Conservation Area is bound by busy arterial roads, Holborn and Chancery Lane but vastly made up of well-preserved narrow network historic streets.

Setting:

214. The conservation area is surrounded by a varied and diverse character: to the East, large scale modern commercial buildings, to the South the diverse character of commercial buildings associated with the Fleet Street Conservation; to the West is the Bloomsburg Conservation Area characterised by low rise buildings around formal landscape squares; to the North is the Prudential Assurance Building located in the Hatton Garden Conservation Area.

Impact:

215. The indirect impacts on the Chancery Lane Conservation Area derive from the above ground works associated at Fulwood Place within the London Borough of Camden. There would be limited intervisibility with the Chancery Lane Conservation Area and the works are deemed to have no impact on the Conservation Area.

Wider Heritage Impacts

216. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance. In accordance with paragraph 201 a number of potentially affected assets were scoped, accounting for their significance and contribution of setting to that significance. Additional assets assessed include:

- No.4, 5 and 6 Staple Inn (Grade I)
- 337 and 338, High Holborn (Grade II*)
- No. 9 and 10 Staple Inn (Grade II)
- Staple Inn Hall (Grade II)
- No. 7 and 8 Staple Inn (Grade II)
- The Institute of Actuaries (Grade II)
- Staple Inn North and South Buildings (Grade II)
- Mercer's School Hall and Building Adjoining (Grade II*)
- Barnard's Inn Hall (Schedule Monument)
- Hatton Garden Conservation Area (Camden)
- Bloomsbury Conservation Area (Camden)

Conclusion of Heritage Impacts

217. The proposals, by way of impact on setting and character, would preserve the heritage significance and setting of all aforementioned heritage assets. The proposals comply with policies CS12 and DM12.2 of the Local Plan 2015 and S11 and HE1 of the emerging City Plan 2040.

218. The loss of historic fabric associated with the Kingsway Tunnels as a non-designated heritage would be mitigated through the improvement to the accessibility and visibility of this currently unknown heritage asset to a wide public audience. The industrial language of No.38-39 Furnival Street would be maintained through the reconstruction of the brick façade and the reinstatement

of the metal crane. As such, the proposals are considered to accord with Local Plan Policies CS12, DM12.1 and DM12.2, emerging City Plan Policies S11 and HE1, London Plan Policy HC1, having accounted for and paying special regard to section 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and the relevant NPPF policies.

Archaeology

219. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.

220. An Archaeological Desk-Based Assessment has been submitted with the application.

221. The development site lies in an area of archaeological interest (Archaeological Priority Area) identified in the City Local Plan. The City of London is considered an archaeologically sensitive area in its entirety. In accordance with the City of London Local Plan 2015, all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

222. The desk-based assessment highlights that there was an archaeological excavation by the Museum of London's Department of Urban Archaeology in 1988 prior to the erection of the existing building at 40-41 Furnival Street. This revealed medieval gravel quarries backfilled with brickearth, a series of 13th-15th Century rubbish pits and a chalk-lined cesspit. The remains of the 17th Century L-shaped building were excavated on the southern half of the site which might have removed any evidence of the earlier inn. It is therefore likely that archaeological remains have been removed from 40-41 Furnival Street. The current building has a basement level with a floor slab at approximately 3.70m deep and it is considered that any archaeological survival would be very low.

223. At 38-39 Furnival Street, bombing damages occurred during WWII and the previous building was demolished. The current building hosts a vent shaft and a lift in its basement that provides access to the tunnels. Given the old basement housing the Kingsway Tunnels' vent shaft and access shaft lay on the site, archaeological survival is likely to be very low. The Kingsway Tunnels have survived almost intact.

224. The scheme proposal includes the demolition of 38-39 and 40-41 Furnival Street and their redevelopment, including the construction of a new four-level

basement across the footprint of the new buildings. The existing round shaft at 38-39 Furnival Street would be retained within the new basement and excavation works would aim to enlarge the areas around it to provide space for evacuation stairs.

225. There would be no construction works for the tunnels themselves, however refurbishment works would be necessary to bring the tunnels into use. It is acknowledged that these works could affect some of the earlier historic features of the tunnels dating in the 1940s such as the air-raid shelter and later bunker and computer centre.

226. The Greater London Archaeological Advisory Service (GLAAS) advised that further archaeological work should be undertaken for 38-39 Furnival Street before any excavation takes place as some archaeological potential remains. In relation to the tunnels, GLAAS identifies the high heritage interest they hold and recommends that historic building recording is carried out for them prior to the redevelopment works. The historic building recording should utilise the digital scans that have already been carried out for the site. The proposed development works are identified as possible to cause harm to archaeological remains and field evaluations should be carried out to determine the appropriate mitigation measures. GLAAS, therefore, recommends two-stage pre-commencement archaeological conditions requiring a Written Scheme of Investigation (WSI) and a Historic Building Recording to be carried out prior to any demolition works. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

227. The proposals are acceptable in archaeological terms subject to conditions to cover a WSI and historic building recording. The application therefore complies with Local Plan Policy DM12.4 and draft City Plan Policy HE2.

Public Access and Inclusivity

228. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the emerging City Plan 2040 and policy D5 of the London Plan. Plan 2040 and policy D5 of the London Plan. In particular, policy DM10.8 requires to achieve an environment that meets the highest standards of accessibility and inclusive design in all development (both new and refurbished), open spaces and streets.

229. 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.

230. A Design and Access Statement has been submitted in conjunction with supplementary letter of clarification prepared by David Bonnett Associates (DBA) in response to officers requests.

231. It is also noted that the proposed development has been reviewed by City of London Access Group (CoLAG) during pre-application stage.

232. The proposed development has been carefully designed within the constraints of the existing buildings to ensure that the access needs of all users have been considered.

233. The provision of places to store a mobility scooter is welcome in principle and should include fire prevention measures and accessible charging points. Further details of this would be included within an Access Management Plan.

Arrival at the Site

234. Consideration has been given to the points of arrival at the site and the main entrance to the cultural use amended following officers comments. Details of the points of arrival and entrances to the site would be secured by an Access Management Plan.

235. Arrival at the site has been considered for a number of travel options. The walking distances from key public transport nodes exceed the recommended 50m without a rest. It is therefore welcome that resting points with accessible seating are proposed wherever possible at maximum intervals of 50m along the approaches to the buildings from key points of arrivals, to be secured under a Section 278 Agreement. It is also welcome that an additional blue badge space is proposed on Furnival Street near the site's entrance. The exact location and timed restrictions would be subject to further consultation carried out under a Traffic Regulation Order. It is noted that Blue Badge holders are limited to 4 hours parking in City of London accessible parking bays.

236. The applicant has provided a framework to provide new high quality public realm which would significantly improve the pedestrian environment and capacity, the details of which would be guaranteed within a S278 Agreement. The highways authority is exploring the further works under a healthy streets scheme in conjunction with the above on Furnival Street and connecting roads, that will look to provide the required accessible parking space, provide suitable pavement to provide access to all, offer suitable resting areas where possible.

237. 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.

238. Staff arriving on large outdoor mobility scooters would have one dedicated parking space in the ground floor cycle store. An independent and dignified inclusive transfer strategy to access level four office accommodation would be required to be agreed under the Access Management Plan.

Cycle Provision

239. The long stay cycle entrance for the staff of the tunnels would be provided onto Furnival Street and would be automated. 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. The submitted plans show that a space for a larger cycle would be provided.

240. It is noted that 5% of 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. Wheelchair-accessible sanitary and changing facilities are also necessary. On the submitted plans these appear to be provided within the Furnival Street building in close proximity to the office accommodation. However, access to associated staff changing facilities would be limited during hours of operation. Further detail of operational management is recommended to be reserved by condition to ensure that associated impacts are limited.

Entrance

241. The Access Statement details the entrances to 38-41 Furnival Street and 31-33 High Holborn and confirms that they will all be step free with a clear opening width of at least 1000mm. The primary visitor entrances at both Furnival Street and Fulwood Place have been confirmed to be an automated swing doors. Further detail is proposed to be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes designed to inclusive design best practice guidance.

242. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies and 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. Circulation space around the front entrance desk should ensure clear movement for wheelchair users,

people with buggies and mobility scooter users. Details are proposed to be provided through condition.

Vertical Movement

243. 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'. Supporting text (paragraph 6.2.1) further states that there should be an evacuation lift in addition to fire-fighting lifts. Proposals and the access statement confirm that all lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.

244. The lifts which provide access to the office accommodation from Furnival Street are not sufficient for users of larger mobility vehicles and alternative provision should be identified through the Access Management Plan. It is recommended that details of lifts are reserved by condition.

245. The lifts at Fulwood Place which provide access to the tunnels and are integral to the escape strategy from the tunnels do not meet the recommended size set out by BS 8300-2:2018 (Table 4) for users of larger mobility vehicles and alternative provision should be identified through the Access Management Plan. It is recommended that details of lifts are reserved by condition.

Horizontal Movement

246. 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 Garden Space

247. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind. The detailed design for the amenity terrace should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition.

Sanitary Facilities

248. It is confirmed that unisex accessible toilets will be provided on all floors, with a range of handed units across the development. Separate male and female, as well as gender neutral cubicles, ambulant disabled cubicles, baby changing

facilities, and a Changing Places facility are provided across the development. Further details of the toilet facilities layouts would be required by condition and their access arrangement through S106 obligation under the AMP.

249. A Changing Places toilet was agreed during development of the proposals, and which will support the public functions of the tunnels and help make it more accessible to more people. There are few Changing Places facilities within the City at present and, although not available on a 24 hour basis, this is a key element of making the scheme more inclusive. Management and operation should be covered in the AMP and would be secured via Section 106 obligation.

Internal recovery and restoration areas

250. Recovery and restoration areas have been deemed important for the proposed development given the long distances to cover in a subterranean environment and potential for high sensory stimulation, including from exhibitions. The exhibition space targets to attract a broader audience including children, elderly, families, people with restricted mobility, a place that would be accessible to everyone. It is therefore critical to ensure that areas of rest and isolation are provided in strategic locations within the tunnels for restoration and recovery.

251. The letter of clarification by DBA proposes accessible seating to be provided at 50m maximum intervals within the exhibition spaces and a quiet room to be placed in the Avenues, where the temporary exhibition space would be provided. Recovery areas are proposed at approximately 60m intervals with exact locations and design to be reserved by condition. Recovery areas would feature accessible seating and tables, drinking points, visually and acoustically calming spaces. Further details could be reserved in the Access Management Plan as an obligation.

Signage and Wayfinding

252. 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 a Wayfinding Strategy will be secured by a condition.

Inclusive Procurement and Co-curation

253. 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.

Public Access and Inclusivity Conclusion

254. The proposal has been designed to ensure that the site is accessible for the greatest range of people. In order for the proposed cultural use to fulfil its goal

of being a top-tier tourist destination, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to get beyond the limitations posed by the existing building and tunnels infrastructure in order to secure the optimal solution for everyone. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

255. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Culture and Education Strategy

256. Policy S1 in the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

257. Local Plan policies CS11 and DM11.2 and draft City Plan 2040 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with emerging Policy CV2 of draft City Plan 2040.

258. A Cultural Plan has been prepared by Future City which sets out the vision and strategy for the use of the existing tunnels as cultural and visitor attraction. The proposed cultural destination has been characterised as the 'London's Underground Connector' in the Cultural Plan, as it strategically sits between the London Borough of Camden and City of London, two local authorities offering prominent cultural landmarks and central attractions linked to London's rich history from the Roman period, to the presence of St Paul's and Tower Bridge, and various livery halls and historic walks. The site would be an opportunity to add a layer of the 20th century history to London's legacy.

259. The culture and education strategy has been developed around four key principles: Cultural Intelligence; History and Heritage; Active Participation; and Sustainable Futures. It is envisaged to use high-end technologies with programming partners to create transformative experiences in the tunnels providing a unique opportunity for visitors to interact with a range of media through a digital stimulus. The history of the site plays a key role in creating a context of physical heritage assets and programming along the cultural exhibition areas. In line with the Destination City vision and the consultation feedback through engagement with stakeholders inclusive and accessible spaces would be introduced in the tunnels for everyone to enjoy, with part of the cultural programming focusing on raising awareness about environmental issues.

260. As mentioned previously, the tunnels would comprise three spaces: The temporary Cultural Exhibition Space (in the 'Avenues'); the permanent Heritage Exhibition Space (in the 'Streets'); and the Bar. The latter falls outside the Corporation's boundary.

261. The applicant's plan is to assemble a dedicated Cultural Delivery Team, for the delivery of the exhibition programmes outlined in the submitted Cultural Plan, in relation to the temporary exhibition space. A bespoke team would be responsible for the operation of the venue. It is envisaged to partner with London Festivals and Cultural Institutions to enable a variety of cultural exhibitions and events. It is estimated to secure up to 12 events per year. The access, operation and coordination of these events would be secured by an obligation for a Public Access and Events Management Plan in the Section 106.

262. The Cultural Plan identifies the 'History & Heritage Space' (permanent exhibition space) as a 'continuous excitement' with recurring programming responding to the historic significance of the tunnels. It envisions partnerships with historical and heritage institutions within London and the UK. The Imperial War Museum, the British Museum and the Museum of London are mentioned as potential large-scale programming partners, but it is also envisioned to partner with smaller-scale organisations.

263. A final Cultural Operator is not secured at this stage, however the applicant has been in meaningful long discussions with providers who have expressed interest. Suggestions have been made to house the Military Intelligence Museum in the tunnels. A Cultural Implementation Strategy as a Section 106 obligation would be secured restricting demolition works until an Operator is secured.

264. The Cultural Plan refers to an initiative of creating a figurative Lab, referred as the T-Lab, a partnership project that would bring together university, tech-institutions, creative communities as key partners with further collaborations with local and London-wide communities, to support generating and providing content in both exhibition spaces. Opportunities for co-curation and co-creation of cultural spaces with the help of local communities are considered key factor to achieve inclusive developments. An Inclusive Procurement and Cultural Implementation Strategy would be secured by an obligation in the Section 106 agreement which would require further details on inclusive partnerships including the involvement of underrepresented artists and groups in the formation of special exhibitions.

265. The proposed exhibition space is anticipated to attract up to two million visitors per year which would boost national and international tourism. The submitted Socio-Economic assessment suggests that these visitors could spend between £60m - £85m in the local area each year. It is estimated that the development

would generate over 100 jobs through direct employment within the cultural use and an addition of 50 jobs that would arise through the supply chain and worker expenditure at the London level. The proposed development would generate approximately £6.1 million of additional Gross Value Added (defined as "the measure of the value of goods and services produced in an area, industry or sector of an economy").

266. The applicant has made a commitment to offer free school visits to the cultural use. A minimum of two school-trips every week has been found logistically achievable. Free entry is also considered for up to 20 members of the military per weekday while discounts would be available for universal and pension credit holders, emergency workers and carers, teachers, students, young people and local residents.

267. It is targeted to attract audiences which can differ between the different cultural offers within the tunnels. Indications of the audience segments include cultural tourists, incidental tourists, young creatives, families, older learners, education groups (including schools, colleges, universities, further education, etc), special interest groups (clubs, societies, etc), local residents and workers.

268. The social benefits of the proposed cultural use include the following features and commitments made by the applicant as stated in the Socio-Economic Assessment:

- Offer entry discounts for universal and pension credit holders, emergency workers and carers, teachers, students, young people and local residents and free school trips and members of the military to the proposed cultural exhibition space;
- Maximising opportunities for local jobs and apprentices in collaboration with London Borough of Camden and City of London, including placements for local school age children and/or local adults residents;
- Work with local community centres to keep local residents informed on the development progress and job and training opportunities;
- Accessibility and Inclusivity – the cultural spaces would feature enhanced access for people with disabilities (both visitors and employees) and ensure spaces would be designed to be enjoyable and safe for everyone;
- Inclusive procurement and partnerships with inclusive cultural providers; opportunities for co-created/co-curated exhibitions (community participation is shaping the design of new cultural events/spaces/galleries); partnerships with artists of underrepresented groups; volunteering and training programmes for vulnerable groups of people and for schools;
- Repurposing existing historic tunnels – the proposed development aims to provide access to the existing infrastructure that has been non-operational since the 1980s by investing £140m in restoration and preservation. The applicant commits to an £80m investment for installing the immersive technology that will help bring the story of the tunnels to life.

269. The provision of the proposed cultural spaces and the benefits that are brought forward would be captured and secured under a Section 106 agreement for a Cultural Implementation Strategy and Operational Management Plan.

270. The proposed cultural spaces would provide a destination cultural and community space which would contribute towards the Corporations Destination City initiative of creating fun, inclusive and innovative spaces and places that attract people to the City.

271. The proposed cultural spaces are considered to be an enhancement to the City's cultural provision and provide public benefits such as free school-trips at least twice a week and delivering a highly accessible and inclusive venue.

272. As such, officers consider that the proposal would be in accordance with Policy CS11 to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy, Policy DM 11.2 Public Art To enhance the City's public realm and distinctive identity.

Transport and Highways

273. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The application site is also in close walking distance of London Underground (LU) stations, namely Chancery Lane Station (c.130 metres), Farringdon (c.650 metres) and Holborn (c.700 metres). Chancery Lane provides a direct connection to the Central Line and is reachable within 2 minutes on foot. Farringdon provides access to the Circle Line, Hammersmith and City Line, Metropolitan Line and the Elizabeth Line. Holborn (one stop from Chancery Lane) provides onward connection to the Piccadilly Line and Central line.

274. Farringdon Station is an 8-minute walk away (approximately 650m to the northeast of the Site). In addition to providing access to the Circle, Hammersmith & City, Metropolitan, and Elizabeth Line, Farringdon Station also has access to National Rail services, via Thameslink. The station is served by regular trains to St Albans, Cambridge, Brighton, Horsham, and Bedford, amongst others.

275. City Thameslink is a 10-minute walk away approximately (800m south of the Site). It is served by trains operated by Thameslink on the Thameslink Route which is a 24-hour main-line route, running from Bedford, Luton, St Albans City,

Peterborough and Cambridge via Central London to Sutton, Orpington, Sevenoaks, Rainham, Horsham, Brighton and East Grinstead.

276. The closest bus stop to the Fulwood Place Site access is the Chancery Lane Station bus stop, 125m to the east. The access at 38-41 Furnival Street is closest to the bus stop at Holborn Circus, 120m to the north-east of the access point. Chancery Lane Station bus stops are located between the two access points in Fulwood Place and 38-41 Furnival Street. The stops are served by 5 services, the number 8, 59, 133, N8, N25, and N242.

Trip Generation

277. The applicant has submitted a Transport Assessment (TA) to support the application, which includes details on trip generation and modal splits. The trip generation has been calculated by reviewing the theoretical capacity of a busy design day for visitors coming to The London Tunnels. The design day has been designed to accommodate the predicted trip generation for the 20 busiest days of the years (bank holidays etc) based on a density of 6.53sqm per person in the tunnels, equating to a maximum of 1,020 visitors on site with 750pp/hr in the tunnels. A normal day (weekday) has been calculated at 10sqm per person which equates to 490pp/hr in the tunnels and 760pp/hr across the Site as a whole.

278. Based on the maximum capacity of 1,020 visitor capacity, extrapolating this over to a maximum daily, weekly, monthly and annual capacity is shown below in Figure 8.

Access	Development Site Peak	Daily	Weekly	Monthly	Annually
Design Day	1,020	9,180	61,194	271,089	2,464,442

Figure 8. Maximum visitor capacity assessment

279. Within the initial submission of the Transport Assessment the applicant compared the likely modal split of the site to the Postal Museum in Islington. Amended documents have since been submitted with the more likely compatible site of the Museum of London as a comparison which is considered to be more similar in nature and likely to generate a similar modal split for the proposed development.

280. Officers are satisfied that based on this latest submission the outlined impact of the development can be assessed based on the current assumptions included within the Transport Assessment Addendum.

Mode	%	Design Day Hourly Trips (two-way)	Design Day Daily Trips (two-way)
Pedestrian	15	225	2,025
Public Bus	12	180	1,620
Train / Underground	65	975	8,775
Car (Blue-badge)	0	0	0
Cycle	6	90	810
Taxi	1	15	135
Coach	Up to1*	Up to 15	Up to 135*
Total	100	1,500	13,500

Figure 9. The modal split for the proposal

281. The overall numbers travelling to and from the site each day are likely to be significant and therefore require mitigation. While there is also a potential additional impact from the staff trip generation, with only 85 staff based at this site at any one-time, officers have focused the impact of the assessment on the public highway on the number of visitors.

282. In addition to this the additional visitors attending the special events proposed for a typical operational purposes are required to be taken into account within the assessment.

283. Focusing on the main visitor trips, based on the above modal split, there are four key areas of consideration:

- The pedestrian impact in the area. With a predicted 2025 additional pedestrians travelling to/from the area, additional visitors coming via public transport and coach would need to be assessed as they would also likely all need to utilise pedestrian links to and from the site. This would inevitably have an impact on pedestrian comfort levels in the area.
- Public transport capacity. With the significant number predicted to use the train and underground travelling to and from the site, initial impact analysis assessments have been provided to demonstrate that local public transport infrastructure can cope with the additional uplift in trips.
- Taxi mitigation. With a predicted 135 people likely to use taxis to travel to and from the site, on an assumption of two to three capacity per taxi,

this would generate an additional 45-68 taxis per day travelling to and from Furnival St.

- Coach mitigation. Coach trips to and from the site would be discouraged.

284. In summary, this application would produce a significant impact on the public highway. That being said, officers are confident that through the below outline mitigation measures, conditions and obligations the application is considered acceptable in transport terms.

Events Management

285. In additional to the outlined 'day to day' trip generation the application seeks to use the venue for other out-of-hours uses as a potential events venue. This impact would need to be carefully managed with consideration being given specifically to any impact on local residents from noise or vehicle movements.

286. Any events would likely need to be considered on a case-by-case basis, particularly if these events would require special deliveries, any special allowance of vehicles to and from the site, possible queuing or dwelling outside the site. Operation and opening times would also be required to be managed to minimise the impact of these events and ensure that any impact on the public highway can be mitigated.

287. Therefore, in order to manage these events appropriately, an Event Management Plan is proposed to be secured via the attached Section 106 legal agreement which would include the requirement of event management plans to be submitted to the highway authority prior to each event. It is noted however that should the Highway Authority feel that the impact on the public highway is unacceptable then the Authority reserve the right to refuse permission for the event proceed.

Pedestrian Impact and Public Realm

288. Upon review the submitted proposals would likely generate a high number of visitors traveling to or from the site each day, with an expected 2,025 pedestrian trips per day. The overall impact on the public highway and specifically on the pedestrian comfort levels has been a significant focus in assessing this application.

289. A site visit was conducted by the applicant to measure the footway widths within an agreed study area to measure the critical paths. Critical Paths are defined as the effective width of the footway where pedestrians can walk. The critical paths additionally took into account street furniture and any frequent pedestrian queues at bus stops or other areas.

290. This corresponded with a pedestrian count for the area (June 2023), with which the pedestrian comfort levels can be assessed with. The applicant has applied the expected uplift in pedestrian numbers should planning permission be granted to this assessment along with predicted uplift in footfall by 2041 to predict any potential alterations to the pedestrian comfort levels.

291. Pedestrian Comfort Levels range from A-E, with A being the most comfortable for free-flowing pedestrian movement. The City of London is committed to providing no lower than B+ standard of all public spaces both of private public realm and on public highway.

292. In general, the impact of comfort levels is acceptable, as this is mainly helped by the many options for pedestrian routes and public transport access across the area. However, given the constraints of the site there is likely to be an impact on Furnival Street for which the main entrance to the site is proposed.

293. Furnival Street is a narrow street that is north bound for general traffic only with a contra flow cycle lane. It currently suffers from very narrow footways which would need amendments should planning permission be granted. Initial concerns from officers about queuing from the main entrance of the site onto Furnival Street have been satisfied with the submission of a supporting assessment, showing the permeation of pedestrians into the building. The submitted document is considered to be sufficient to meet the above needs and would ensure no external queuing on the surrounding public highway.

294. In order to address the pedestrian comfort levels of Furnival Street it is likely that mitigation would be required to allow the street to cope with the increased demand. These measures could take the form a raised table along the whole of Furnival Street from the northern point of the site.

295. However, Furnival street will still need to be left open to vehicles, including emergency vehicles, for required access to the site, along with maintaining two-way access for cyclists.

296. The proposal aims to mitigate its impacts by including various public realm improvement works along the Furnival Street, in conjunction with the City of London's Healthy Street aspirations for the area. The general aim of the Healthy Street plan for Furnival Street is to redesign the street and manage access to make streets more accessible, engaging and providing safe places for people to walk, cycle and spend time. The proposal has considered how the application would intertwine with the City's scheme and the measures proposed above are considered to be compliant with the CoL's Healthy Street aspirations. The extent of the works to be secured under a Section 278 agreement.

297. In conclusion the proposals impact on the local and wider streets is acceptable, subject to the outlined changes which will require the applicant to enter into a Section 278 agreement.

Building Line

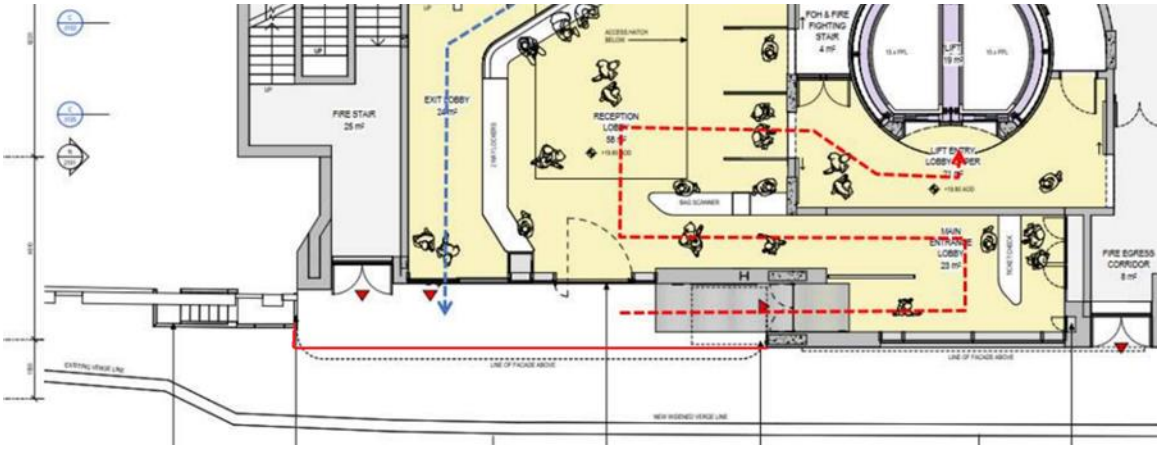


Figure 10. Change in Building Line

298. The applicant has proposed to bring the building line on the north side of the site on Furnival Street back to accommodate the visitors, as outlined from the red delineation line on Fig 3. This will enable the permeation of visitors into the site. The section would remain as private given the location underneath and the protruding first floor.

Taxi movements and drop off

299. The development is expected to generate 15 taxi trips per hour, which would equate to approximately 8 vehicle movements (based on 2 people per taxi). It is proposed that all taxi's would drop off and collect from Holborn, as per existing highway arrangement.

300. Furnival street is currently used as a cut through for taxis and therefore, realistically, is likely to be the key area for loading. While the Travel Plan proposes to minimise vehicle trips on Furnival Street during the development opening hours this will also need to be backed up by alterations to transport infrastructure.

301. In order to mitigate the impact from taxis and to prevent vehicles from picking up and dropping off directly outside of the site, the City's Healthy Street Scheme will consider restricting vehicle movements. The scheme could potentially introduce timed closures or traffic mitigation measures however this is subject to consultations with the neighbouring properties. The Section 278 therefore, agrees a scope of work which would include immediate measures, such as pavement widening, and future collaborative mitigation.

Coaches loading and dwell time

302. The development is expected to generate up to 135 people travelling to and from the site by coach. With coach capacities varying between 40 to 60 passengers, this would generate between 3-4 coaches arriving to the site each day.

303. Officers have worked with the applicant who is in agreement that coaches should be discouraged from traveling to the site and at the point of initial booking would be advised to seek alternative modes of travel to the site and to utilise schemes such as the School Party Travel run by Transport for London.

304. A number of locations have been proposed to date for possible loading and dwelling area for coaches away from the application site. Coaches that must travel to the site will therefore be advised they are not to dwell or wait for passengers in the local vicinity of the site.

Servicing

305. The proposed development would be car free, which is considered acceptable. All vehicle trips generated by the development would likely be associated with taxis and delivery & servicing. It is estimated that around eight deliveries are expected to be generated per day.

306. Due to the narrowness and the restricted access of the site on Furnivall Street, the main delivery point would be from Holborn, specifically outside 8-9 Holborn, which is set away from residential properties. Access from that section of highway is currently restricted by a mandatory cycle lane which is in operation between the times of 7:00 AM and 7:00 PM Monday to Friday. The proposed solution has been considered by CoL Environmental Health officers who did not raise any objection, but seek to ensure best practice and ways of minimising noise to the local residents through the management plans to be secured for the site in the legal agreement.

307. The applicant therefore has agreed to all deliveries taking place out of hours, with the main delivery point on Holborn, between the hours of 7:00 PM and 10:00 PM Monday to Friday. In order to secure this agreement, the Service Management Plan would be secured as an obligation.

308. It is noted that the above arrangements would serve the main cultural use of the site. Any servicing and deliveries in relation to the proposed bar would be agreed with Camden officers and would not occur within the City.

309. Some limited deliveries, such as refuse collection could be allowed to take place on Furnival Street for health and safety reasons. The full details of the scheme are subject to further design work and consultation.

Disabled Motor Vehicle Parking

310. Policy T6.5 of the London Plan and Policy 16.5 of the Local Plan requires proposals to provide disabled parking for users of the site. However, due to the constrictive size of the site at surface level, combined with the structurally restrictive existing supports that link in with access of the lower tunnels, provision of the disabled parking on site cannot be achieved.

311. In order to provide parking for disabled users, the scheme under the Section 278 agreement on Furnival street, will seek to provide disabled parking in or close by, in conjunction with the Healthy Streets scheme. As part of this agreement it shall be outlined that one of the key considerations for the proposed Highways scheme is to provide disabled car parking near the site.

Travel Plan

312. In order to mitigate the impact on this development a Full Travel Plan is required to be put in place, which is required to cover the active travel promotions as well as monitoring for staff and visitors. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits. It is particularly important to note that actions discouraging coach use to and from the site should be integral to targets and actions within this Travel Plan. The discouragement of coaches has been outlined in the Transport Assessment Addendum and this states that coach trips would be discouraged wherever possible.

313. A Travel Plan (TP) is proposed to be secured as a Section 106 planning obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to occupation and this would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation. The TP should include the action plan with smart objectives, aiming to encourage the use of the sustainable modes of transport.

314. Transport for London encourages developers to use the TRICS database for trip generation predictions. Under the proposed legal agreement the applicant will also be required to undertake a TRICS after study and provide TfL and the City of London with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for

the various use categories associated with this development. The necessary after surveys and results are proposed to be secured by Section 106 agreement as part of the Travel Plan review and monitoring process.

Cycle Parking

315. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the London Plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

316. The level of cycle parking proposed as part of the development for long stay parking meets minimum London Plan requirement for the cultural use with 12 long stay cycle parking spaces are proposed as being provided. At ground level is proposed 3 Sheffield stand providing 3 general spaces and 1 fully accessible space. At basement level which is accessible via a large lift at the secondary entrance is proposed the remaining 8 spaces with the provision of two-tier Joster Stand. Provision of additional 2 spaces is also required to cover for the requirements of the bar at the same basement location. Details of the cycle stores have been secured by condition.

317. The accessible Sheffield stand is welcomed and meets the London Plan requirement for 5% of long stay parking to be accessible to disabled bicycle users. It is also considered that the other long stay cycle parking meets cycle design guidance standards and is acceptable. Officers encourage the provision of an accessible cycle bay at the basement storage and require the inclusion of a range of cycle space types split across the two bike stores by way of condition. Furthermore, the proposed application also seeks to provide one accessible shower at the staff accommodation at fourth level and another one at basement level where the rest of the bikes are to be stored. In addition, provision of lockers for staff is made in the office area and the basement cycle store. The supporting facilities are considered acceptable for the 14 long stay cycle spaces.

318. Short stay cycle parking requirements for similar uses as outlined in the London Plan is 1 space per 100sqm. If this requirement is applied to the total size of the development, there would be a requirement to provide 125 short stay cycle parking spaces.

319. Due to the constraints of the development site, the constricted floor layout required for queueing and access to the tunnels and the large number of cycle spaces required it is not possible to provide spaces within the development itself. Nevertheless, it is proposed that the Section 106 legal agreement would

secure the provision of cycle parking spaces on the public highway, including improvements to the cycle infrastructure in the vicinity of this development. Camden Officers have agreed to provide 20% of the total requirement on their public highway. Therefore, subject to this provision the application is considered acceptable on this basis.

Management and Construction Impacts on the Public Highway in the local area

320. The proposal would involve a significant amount of demolition and construction works. This would generate a large number of construction vehicle movements during the overall construction period. Demolition and construction at ground level as well as access to works below the surface would require cross boundary access between two authorities, the London borough of Camden and the City of London corporation. It is also important to note that works would be conducted under Transport for London's strategic road network on high Holborn, as well as close to London Underground assets. All of the above mentioned stakeholders would be required to agree construction logistic plans prior to the commencement of works.

321. The proposed works would likely have a significant impact on the operation of the public highway if not managed effectively. Officers primary concern is public safety but would also need to ensure that construction traffic does not create (or add to existing) traffic congestion or impact on the road safety or amenity of other highway users. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality) during the construction stage.

322. London Underground while not objecting has asked to impose a condition for approval to safeguard their assets from ground movement impacts during demolition and construction works.

323. A preliminary Construction Logistic Plan (CLP) has been submitted in support of the planning application and this provides useful information to outline the proposed works and methodology.

324. It has been proposed that the majority of the demolition and construction works would be carried out from Furnival Street within the CoL boundary, with an additional secondary access from Fulwood place in the London borough of Camden. Furnival street is located within a gyratory network, that contains narrow roads with tight corners and will have limitations on vehicle access through the area. It should be noted that the final admission of the construction logistic plans would need to provide details and significant consideration on how access would be managed.

325. A more detailed CLP and DLP would be secured by via condition with a requirement to be prepared once a Principal Contractor has been appointed, which would need to be in line with TfLs Construction Logistics Plan Guidance.

326. The City of London needs to ensure that the development can be implemented without being significantly detrimental to the amenity or the safe and efficient operation of the highway network in the local area. Therefore, a CLP and a DLP is proposed to be secured as via condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the CoL Local Plan. This would provide a mechanism to manage/mitigate the impacts which the proposed development would have on the local area. The CLP would need to be approved by the CoL prior to works commencing on site.

Waste Management

327. Local Plan policies CS17 and DM17.1 require sustainable choices for waste and for waste facilities to be integrated into building design. Draft City Plan Policies S16 and CE1 require developments to consider circular economy principles.

328. A Waste Management Plan has been submitted as part of this application which sets out the servicing and waste collection strategy. The proposed development would be serviced on site with all deliveries and refuse collection activities being carried out at ground floor level, accessible via Furnival Street. These arrangements serve all activities taking place within the building at Furnival Street and underground. The bar would be served via Fulwood Place, in LB of Camden.

329. The City's Cleansing team were consulted and raised some initial concerns of health and safety regarding the internal transfer of bins form the basement level 1 to the ground level. An updated Waste Management Plan has since been prepared to address these concerns and was submitted to CoL for review. The Cleansing team has reviewed the responses and confirmed that the proposed waste storage and collections facilities comply with CoL's requirements and no objections were raised.

330. The waste storage is considered to comply with Local Plan policies CS17 and DM17.1 and draft City Plan policies S16 and CE1. An obligation for the Servicing and Delivery arrangements of this development would be secured in the Section 106.

Transport Conclusion

331. The proposals are acceptable in transport terms, subject to the necessary conditions and obligations as discussed above.

332. Nos. 38-39 and 40-41 Furnival Street represent a constrained site within a tightly knitted, urban section of the City of London. Furnival Street itself is also restricted in terms of its size, design and current vehicular and pedestrian usage. The proposed development would significantly increase the use of both the public realm and the highway that is located immediately adjacent to the site. However, the submitted documentation details appropriate mitigation and measures that would reduce the impact on the surrounding highway network while also promoting active and sustainable transport.

333. The following S106 planning obligations and conditions would therefore need to be secured:

- The applicant has agreed to enter into a S278 agreement, which would intertwine with the City of London's Healthy Street plan for the area. These plans would be delivered in conjunction with the City's aspiration for the area and mitigate the impact of the proposed development by delivering a substantial uplift in the quality of the surrounding highway network. The submitted drawing, titled 'Vision zero/Healthy Streets Plan' ref: 70106185-TP-SK-18 rev: P02, includes a shaded area in green, showing the extent of S278 works, and agreed with the applicant. The works are subject to further design and consultation.
- Any design would also need to address the City of London's key transport objectives for the area, which is to:
    i. provide a healthy streets scheme with consideration to providing a shared surface, increased footpath, additional street furniture, additional blue badge parking and further public realm improvements
    ii. improve sustainable transport to and across the area
    iii. provide additional greening
    iv. maintain the contra flow cycle lane
    v. maintaining access for emergency vehicles
- Contributions towards cycle infrastructure.
- Travel Plan (TP) s106 agreement shall state that the TP for all users of the development shall be approved prior to occupation of the site.
- Delivery and Servicing Management Plan (DSMP). The Section 106 agreement shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be followed.
- A condition to secure a Construction Logistic Plan (CLP). The condition shall state that the CLP shall be approved prior to any works starting on site and the approved plan shall be followed thereafter. It should also

restrict HGV movement to and from the site to with in the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.

- S106 obligation - requiring the submission of an Event Management Plan (EMP) to no less than 12 weeks prior to each event commencing. The Highway Authority (HA) will then have at least 21 days to request alterations or object to any event.
- A condition requiring the details of the long stay cycle parking spaces for the development. The spaces to be designed to London Cycle Design Standards, implemented prior to occupation, maintained and retained as part of this development thereafter.

Daylight, Sunlight and Overshadowing

334. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of amenity space.

335. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

336. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of the Building Research Establishment's guidelines.

337. Paragraph 3.10.41 of the Local Plan indicates that BRE methods will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Paragraph 3.10.41 of the Local Plan and Policy HS3 of the Draft City Plan states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

338. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- **Sunlight**: Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Interpreting results

339. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

340. 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

341. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines using daylight (VSC, NSL) and sunlight (APSH) assessment methodologies and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE7 of the draft City Plan 2040. Policy D6D of the London Plan 2021 states that the design of development

should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan 2040 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.

342. The report has identified the following sensitive receptors:
- 1 to 6 Dyers Buildings (residential);
- 34-37 Furnival Street (residential);
- 10 Furnival Street (office/commercial); and
- 10-12 and 14-18 Holborn (office/commercial).

343. The report states that due to window locations and views across the Site, only 1 to 3 Dyers Building have been considered relevant for assessment for daylight and sunlight. However, several of the properties within 4 to 6 Dyers Buildings have windows facing directly towards the development site, which have not been included for assessment. Officers requested to undertake assessment of these properties. In response, a VSC assessment was undertaken by GIA on the windows of 4-6 Dyers Buildings facing the site.

344. The assessment also excludes the residential premises within Sterling House, 12 Dyers Buildings which have windows facing the site, which have not been identified as sensitive receptors. However, given the height and scale of the proposal and the separation distance of this property from the site these windows are not considered relevant for assessment.

345. The residential premises immediately to the south of the proposed development site, at 34-35 and 36-37 Furnival Street, have not been assessed because their windows are not orientated within 45 degrees of the uplift of the proposed development in line with the advice set out within the BRE (2022) Guidelines.

346. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance in forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and

provides acceptable living standards (draft City Plan policy DE7) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

347. Two commercial receptors have been identified as listed above. However, the impact on their daylight and sunlight has not been assessed. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. The proposed increase in height to 38-39 Furnival Street would be likely to have a minor impact on daylight to Chancery Exchange, 10 Furnival St. (opposite), it is however worth noting that the proposed development would still be lower in height (by over 3 metres) (than the building opposite at 10 Furnival St.). In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The dense urban environment of the City, is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. As such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises.

348. There are no nearby gardens or amenity areas directly to the north of the development that would require a sunlight / overshadowing assessment.

Daylight and Sunlight

349. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC of the NSL guidelines are not met.

350. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a

room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

351. Both the London Plan 2021 and the draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

352. The applicant has submitted a Sunlight and Daylight Assessment and a Daylight and Sunlight Addendum letter.

1 to 3 Dyers Buildings

Daylight

353. 1 to 3 Dyers Buildings is a five-storey residential development located immediately to the east of the application site. Given the close proximity of this development to the application site, which are effectively separated by a light well, the existing daylight levels are low, particularly at basement, ground, first and second floor levels. The daylight and sunlight report has assessed 59 windows serving 18 rooms within this development for daylight.

Windows: Vertical Sky Component

354. Of the 59 windows assessed, 35 would meet the BRE guidelines for skylight visibility (VSC). Of the 24 windows which fall below the guidance for VSC, eight experience proportional VSC reductions between 20% to 30% (minor adverse impact), nine between 30%-40% (moderate) and seven in excess of 40% (major).

355. Of the 24 windows that fall below the BRE recommendations, 18 serve known living rooms. Four remaining windows serve rooms for which the use is unknown but are assumed to be habitable. A further two rooms serve bedrooms which are considered to have a lower requirement for natural light.

356. It is noted that the VSC levels to the windows on the basement, ground, first and second floors are exceptionally low in the existing scenario (the majority of windows experience a VSC of below 10% with some as low as 0-0.3%). These windows are therefore more susceptible to greater proportionate reductions in skylight visibility. So, whilst these windows see reductions in VSC over that which is recommend by the BRE guidelines, the absolute reductions in VSC are generally quite small (i.e. between 0-4.3%). Of the 24 windows that fall below guidance, nine see an absolute VSC reduction of less than 1%. A further eight windows see no more than a 3% absolute change for VSC, and the remaining eight windows see no greater than a 5% absolute change in VSC. The report points out that absolute reductions of 3% have been referenced in past appeals as “virtually imperceptible”, and absolute reductions of 5% have

been described as “barely noticeable”. As such, while there is identified breaches of the BRE Guidance, the existing level of VSC is exceptionally low that any minimal change would result in the windows falling below the guidance. The reductions proposed however are modest in reduction, would fall under the imperceptible category and as such are assessed as acceptable.

Rooms: Daylight Distribution

357. Of the 18 rooms assessed, 13 would meet the BRE guidelines for daylight distribution (NSL). Of the five rooms that fall below the guidelines, two would experience a percentage alteration of between 30%-40% (moderate adverse impact), and three would experience a percentage alteration in excess of 40% (major adverse impact).

358. Two of the five rooms (F00, R2 and R3) assessed for daylight distribution (NSL) that fall below the guidelines serve bedrooms, which have a lower requirement for daylight. These rooms would experience proportionate reductions in daylight distribution of 32.1% and 67.7%.

359. The remaining three rooms are a ground floor living room (F00, R4), and LKDs on the first and second floors (F01/R2 and F02/R2). The living room on the ground floor would experience a reduction in daylight distribution from 15.4% to 8.5% of the room having a view of the sky. The LKD on the first floor sees a reduction in daylight distribution/sky visibility (NSL) from 30.6% to 13.5% and the LKD on the second floor sees a reduction in sky visibility from 51.1% to 35.3%. Although the daylight distribution analysis is based on assumed layouts and the results carry uncertainty and the actual impacts may be different in the existing rooms, it is considered that the impact would be acceptable given that the impact in minor adverse to a limited number of rooms.

Sunlight

360. 35 windows have been identified as eligible for assessment for sunlight. The report demonstrates that all the windows assessed would meet the BRE Guidelines for sunlight (APSH) with the proposed development in place.

<u>4-6 Dyers Buildings</u>

361. A VSC assessment was undertaken in GIA’s Phoenix application on the windows of 4-6 Dyers Buildings facing the Site. This showed no alterations beyond 20%, therefore all windows would be BRE compliant and no further technical assessments were deemed necessary. Furthermore, given the proposed massing of the building and separation distances to the residential property the impact in terms of daylight and sunlight is considered to be acceptable in this instance.

10 Furnival Street (Chancery Exchange) and 10-12 &14-18 Holborn

362. It is not considered that the commercial buildings at 10 Furnival Street, 10-12 and 14-18 Holborn are of a nature that requires exceptional daylight and sunlight levels mainly due to its location in a dense urban environment and the type of accommodation which is expected to be largely used during office hours and being relied upon artificial lighting throughout the day. As such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City, is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. On that basis, the assessment has not considered the surrounding commercial buildings, which officers found an acceptable approach.

Conclusion

363. The assessment results included in the daylight and sunlight assessment report submitted with the application demonstrate a moderate to hight level of BRE compliance. Where there are technical breaches of the BRE guidelines, they can be partly attributed to the low existing levels of daylight received by the neighbouring residential properties assessed, which would be sensitive to proportionately higher percentage reductions as a result of the low existing levels of daylight.

364. Overall the daylight and sunlight available will be sufficient and appropriate to the context, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with, London Plan policy D6, Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040.

Light Pollution

365. Local Plan Policy DM15.7 and draft City Plan 2040 Policy DE8 require that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

366. It is considered that only the front (west) facade of previous 40-41 Furnival Street building would be designed with glass bricks creating a level of translucency which would create light spill from internal lighting towards the occupiers facing the west side of the building which is relevant to the commercial building at 10 Furnival Street. There would be no translucent elevations opposite the residential buildings and therefore light pollution has not been considered a material factor in the submitted Daylight and Sunlight Assessment.

367. To ensure that appropriate lighting levels are achieved externally and internally including at roof terrace level, and to mitigate impacts of public realm and nearby residential properties, a condition for the submission of relevant details of a Lighting Strategy and Technical Lighting Design would be required to be submitted for approval. This will have to be submitted prior to the occupation of the building and the details shall accord with the requirements as set out in the Lighting SPD, including but not limiting to details of all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass.

Air Quality

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

369. The application includes an Air Quality Assessment which addresses the likely impact of the proposed development on air quality as a result of the construction and the operational phases of the development.

370. The proposed development will be car free and heating will be through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. The proposal includes a visitor attraction in underground tunnels where levels of indoor air pollution should be minimised.

371. The City's Air Quality Officer has reviewed the proposal and has raised no objections subject to conditions and informatives in respect of generators combustion flues, Non-Road Mobile Machinery Register, and the Indoor Air Quality.

372. In light of the above and subject to conditions, the proposed development would accord with Local plan policy CS15, policies HL2 and DE1 of the draft City Plan 2040 and SI1 of the London Plan which all seek to improve air quality.

Impact on amenity (Noise, Disturbance and Overlooking)

373. London Plan Policy D13 requires the proposed development to mitigate noise-generating uses and Policy D14 aims to avoid significant adverse noise impacts on health and quality of life. Local Plan Policies DM3.5 and DM15.7, seek to ensure that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels. Policies S1 and HL3 of the Draft City Plan 2040 requires that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.

374. Local Plan Policy DM21.3 and Emerging Policies HS3 and DE4 seek to protect the amenity of residential properties from uses which would cause undue noise, disturbance and requires new development near existing dwellings to demonstrate adequate mitigation measures to address the impact. Development proposals are expected to be designed to avoid overlooking to adjacent residential accommodation in line with Policies DM10.3 and DM21.3 of the Local Plan and Policies HS3 and DE4 of the Draft City Plan 2040.

375. An Acoustic Assessment has been submitted which provides an outline assessment of the impact of noise and vibration from the mechanical plant on the surrounding area. In addition, operational use noise and construction impacts have been considered.

376. The nearest noise sensitive receptors that have been identified in the assessment are the residential properties to the south and east of the site, 36-37 Furnival Street and 1-6 Dyer's Buildings, and the commercial occupiers to the west, 10 Furnival Street and 9 Holborn and to the north at 14-18 Holborn. Noise surveys have been conducted to obtain the background noise levels of these properties from two measurement positions. Tabulated results are provided within the submitted Acoustic report.

377. Plant equipment serving the building and the tunnels would be housed within 38-41 Furnival Street building. The new building would house the primary entrance to the cultural exhibition space, ancillary office accommodation and retail spaces at upper levels, basement plant rooms, an air handling unit (AHU) plant room and a roof plant room situated at the northern roof level which forms the highest part of the proposed building. The proposed plant would be subject to a condition that require noise levels to be compliant with the City's standard of at least 10 dBa below background noise level as well as a condition to minimise transmission of structure borne sound or vibration to any other part of the building.

378. The impacts of the demolition and construction work on the surrounding area would be controlled by conditions requiring the submission of schemes of works to protect neighbouring occupiers. Noise and vibration mitigation, including

control over working hours and types of equipment to be used would be included in a construction 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.

379. The impact of the proposed development in terms of noise associated with the operational stage of the cultural use (i.e. the actual underground use) has been considered to be negligible based on the fact that the main visitor space is provided underground and therefore away from nearby noise receptors. Since the earth has enough bulk to keep noise from escaping, noise breakout from the cultural exhibition spaces through the ground is therefore not regarded as a problem. It is however acknowledged that the proposed development has the potential to increase activity at street level with visitors arriving to the venue and exiting through from the upper levels of the gift shop back to the street level. Officers acknowledge that increased footfall in the area would likely increase the noise generated and disturbing to nearby properties. For that reason, the submitted Transport Assessment has produced a robust worst-case scenario based on predictions for the busiest day on site. It is estimated that a standard visitor will spend a total of 1 hour and 20 minutes on the site. Model outputs have tested the operation of the ground floor site entrance on Furnival Street to understand if there will be any external queueing that would have adverse impacts to the amenity of neighbouring occupiers. The dynamic model takes into consideration different parameters proposed to mitigate impact on the highway such as the proposed footway widening in front of the principal entrance that has been designed to maximise any pedestrian queues within the curtilage of the site and the proposed operational and management plan of the venue (including the capacity of the visitor lifts, security check points and processing time for ticketing). The results demonstrate that queuing would not be expected into Furnival Street at the tested scenario. Notwithstanding that, a worse-case scenario of 20% uplift in visitor numbers has been tested with all other parameters taken into account and results still showed no external queuing on the street.

380. In addition, it has been logically assumed that visitors arriving and leaving the site would most like be coming from Holborn where public means of transport and cycle/motorbike parking facilities are available alongside other commercial uses such as F&Bs which people can visit before or after their booked visit to the site. It is therefore considered that visitors arriving and leaving the cultural exhibition space would not create significant queues at street level or use the part of Furnival Street that extends southern to the site which would have likely cause some disturbance to nearby occupants.

381. The existing buildings on Furnival Street are either vacant or serve a modest scale office. The proposed change of use to a cultural facility, by its very nature, would likely increase the pedestrian and vehicular movement within the immediate vicinity. This would be particularly pertinent for the residents of 36-37 Furnival Street and 1-6 Dyer's Buildings. While the highway modelling described above confirms limited use of the street for significant queues, officers are cognisant there would likely be an increase in general noise and disturbance to the surrounding properties from increased activity. This is however the case with all similar cultural use applications that are intending to draw visitors to the site and officers consider that the noise increase would not vastly differ from that already found within the immediate locality (for example on Holborn or other surrounding uses). Care has been taken to prevent significantly detrimental impacts occurring to neighbours, through constrained servicing times and event management conditions, however the potential increase in general human activity is considered to be acceptable and proportional to this highly urbanised, constrained setting.

382. The application also includes a Security Strategy that outlines the security measures to be implemented on site that would support the smooth operation of the development. The site would benefit from a comprehensive management team, including on-site staff such as receptionist and security staff who would be present throughout the site's operational hours. The building would benefit from Video Surveillance Systems (VSS) monitored by on-site staff at a Security Control Room (SCR) to aid in the management of the building and surrounding spaces. As such, officers consider that adequate management of the development would likely ensure no adverse impacts are cause due to increased pedestrian movements around the site or increased number of users of the building. Details of an Operational Management Plan would be secured in the Section 106.

383. The proposal involves the operation of two separate cultural exhibition spaces within the tunnels. The Heritage Exhibition space forming the permanent visitor attraction would operate on a daily basis, and the Cultural Exhibition space which would be available for temporary exhibitions along the year and would operate with programmed events. The Cultural Plan estimates approximately 12 events taking place intermittently over a year. Further details on event programming and minimising the impact of events on amenity in terms of dispersal of visitors at night time and noise and disturbance would be required as part of the Public Access and Event Management Strategy that would be secured in the Section 106.

384. The proposed roof terrace at level four, would be used by the working staff and no members of the public would be allowed to access it. The terrace would measure 40sqm area with a 1.4m high boundary and embedded plant floor along its perimeter to provide privacy. The residential properties to the east and

south side of the terrace would be further protected from overlooking by the proposed frosted glass screen of 1.4m height and excessive greening against the eastern boundary of the terrace. Notwithstanding that, it is noted that the terrace is set back from the eastern side as the east elevation has been designed with an inclination to this portion of the building. This design provides greater distance from the adjacent residential properties and reduces the level of potential overlooking drastically. An external staircase is proposed to the southeast corner of the terrace to be used only as a fire escape. An alarmed gate would be in position to ensure that these stairs are only used in an emergency. The Environmental Health team has recommended a condition to restrict the use of the proposed roof terrace between the hours of 20:00 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 in order to safeguard the amenity of the nearby occupants. Officers consider the proposed privacy measures sufficient to safeguard the privacy of the surrounding dwellings and recommend a condition for the approval of details in relation to the proposed screening and planting of the roof terrace.

385. It should be noted that the proposed bar and the programmed school trips to the Heritage Exhibition space would access the site solely through the secondary entrance at High Holborn only, which is located within London Borough of Camden. Therefore, the relevant Local Planning Authority would be responsible to control noise and disturbance to safeguard the amenity of neighbouring properties around the secondary entrance.

386. Due to there being nearby sensitive receptors it is also considered necessary to restrict overnight servicing, therefore a condition will be included to ensure no servicing of the development shall take place between 23:00 and 07:00 Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays.

387. Subject to the imposition of conditions, in particular those relating to noise from plant and schemes of works to protect against the impacts of demolition and construction and event management, it is considered that the application is in accordance with London Plan Policies D13 and D14, Local Plan Policies DM3.5, DM10.3 DM15.7 and DM21.3, and Emerging Policies S1, HL3, HS3 and DE4 of the draft City Plan 2040.

Health Impact Assessment

388. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

389. The applicants have submitted a Rapid Health Impact Assessment (HIA) using evidence and assessments of impact within documents submitted with the planning application. The London HUDU Planning for Health Rapid HIA Tool Fourth Edition (October 2019) recommends the assessment of potential health impacts under 11 different broad health determinants. The HUDU checklist has been satisfactorily completed and there are not expected to be any adverse health impacts resulting from the proposed development.

390. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Improvements to the public realm along Furnival Street to be secured under Section 278;
- A Heathy Street approach would be adopted;
- Reuse an existing infrastructure and create accessible arrangements for everyone to have the opportunity to enjoy;
- Provision of a cultural space including heritage exhibition space;
- A car-free development with cycle parking proposed on and off site;
- Inclusivity and Accessibility at the heart of the Cultural Plan;
- Design out crime practices;
- Access to local employment and training opportunities as well as inclusive local procurement to be secured under Section 106;
- An outdoor amenity space is provided for the staff, greenery is incorporated wherever possible and active travel is promoted.

391. The HIA does not identify any negative impacts. However, officers considered that some impacts would arise during the construction and operational phases such as dust, noise, vibration and odours, and air pollution caused by traffic. These impacts would be mitigated by the requirements of relevant conditions and Section 106 obligations. For example, by implementing a Delivery and Servicing Plan that ensures sustainable modes and operation of freight; a Construction Environmental Management Plan and Construction Logistics Plan; securing local employment and training opportunities; and other air quality and environmental health mitigations addressed elsewhere in the report.

392. The HIA assessment adequately addresses potential health impacts and therefore the development complies with draft City Plan HL9.

Sustainability

Circular Economy

393. London Plan Policy SI7 (‘Reducing waste and supporting the circular economy’) sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2

and the emerging City Plan 2040 Policy S16 set out the City's support for circular economy principles.

394. The London Plan Policy GG5 states that "Creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste, is not only socially and environmentally responsible, but will save money and limit the likelihood of environmental threats affecting London's future"

395. 'Circular economy' is defined within the London Plan's glossary as, "An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'".

Development Proposal

396. The full extent of the tunnel network is proposed to be retained and refurbished (>90% of material retained). No.s 38-39 and 40-41 Furnival Street are proposed for demolition due to the practicalities of construction and challenges of plant arrangement. Further details are included under Carbon Options Appraisal below.

397. Fulwood Place (31-33 High Holborn, Camden) would require limited structural works at basement and ground level only to facilitate visitor access and the MEP strategy. The building will also be refurbished likely including minor upgrades to the façade (e.g. glazing replacement and draughtproofing).

Carbon Options Appraisal

398. In line with the CoL Carbon Options Guidance, the application includes a study of opportunities to retain and refurbish the buildings at no. 38-39 and 40-41 Furnival Street including a carbon assessment. The Carbon Option appraisal was subject to review by a third-party expert. The reviewer has confirmed that the optioneering has been carried out in compliance with the Carbon Options Guidance.

399. The demolition of No. 38-39 (ventilation building) is consistent across all three options. Due to access requirements (escape stairs, elevator upgrade, installing plant equipment) and the practicality of construction any retention was deemed unfeasible. Redevelopment of No. 38-39 would include: new three-level basement constructed, shaft enlarged down to tunnel entrance and superstructure rebuilt with one additional floor. Dependent on their condition, existing bricks and concrete louvres from 38-39 will be reused to rebuild the replacement.

400. No. 40-41 with its 7-storey concrete frame offers some retrofit potential. Three options were explored for 40-41 Furnival Street only:

Option 1: Major refurbishment

401. All substructure and majority of superstructure retained. Openings created in level 5 slab to accommodate MEP. One additional floor added. Retained slabs, columns and possibly foundations strengthened to accommodate openings and increased loading.

Full Replacement and upgrade of existing façade system.

Option 2: Major refurbishment with vertical extension

402. Substructure and ground to 3rd floors retained. Retained slabs, columns and possibly foundations strengthened to accommodate increased loading. Demolition of top 3 levels of superstructure. Replacement structure has no additional floors but greater height and more efficient space for MEP plant.

Full Replacement and upgrade of existing façade system.

403. **Option 3: Full demolition and redevelopment (Development proposal)** – Demolition and rebuild, including new three-storey basement. One-storey increase in height to no. 40-41.

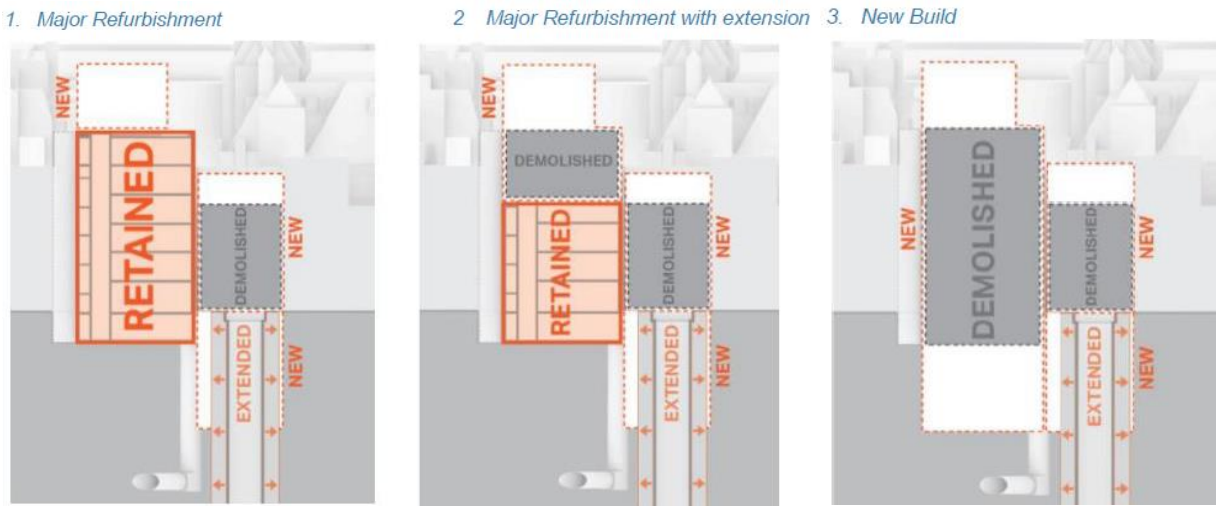


Figure 11. Optioneering

404. The subterranean nature of the tunnels and proposed cultural use with significant visitor numbers requires a significant size and quantity of plant equipment for ventilation and cooling. The existing floor to floor heights of no. 40-41 causes challenges with accommodating the plant. Some of the plant also requires access to fresh air and cannot be placed underground. Options 1 and 2 work within these constraints to propose feasible options which retain existing structure. As the

extent of demolition increases, improvements to system efficiencies are expected due to larger, more flexible plant area at street level.

405. The appraisal of the three scenarios is underpinned by a quantitative assessment of whole life-cycle carbon emissions of each option. Quantitative results from the options appraisal for 40-41 Furnival Street only are set out in the table below.

406. The operational energy figure accounts for the Tunnels and Furnival Street energy use and is based on Category A fit-out which includes regulated emissions (heating, cooling, lighting) and fixed services (e.g. lifts) but does not include any tenant equipment such as audio-visual equipment.

407. The majority of energy consumption takes place in the tunnels; however the plant is predominantly located above ground in the Furnival Street buildings (with minor variation between options). The operational energy rate per m2 is divided by the area (GIA, m^2) of Furnival Street only in order to align with the embodied carbon figures which also apply to Furnival Street only.

Table 7. Quantitative results from the options appraisal for 40-41 Furnival Street

Furnival Street Options	**Option 1** Major refurbishment	**Option 2** Major refurb with extension	**Option 3** Redevelopment (Optioneering stage)
1. Gross Internal area (GIA) m²	1979	2125	2589
2. Increase in GIA (over existing)	10%	35%	60%
3. Substructure % retained by mass	100%	100%	0%
4. Superstructure % retained by area (*frame, upper floors, roof, stairs, ramps*)	55%	35%	0
5. Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA) *exc. sequestration*	666	616	818
6. In-use & End of Life Embodied Carbon (B-C) ($kgCO_2e/m^2$ GIA) *excl. B6 & B7*	464	461	453
7. Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	1,130	1,077	1,271
8. Fuel source	Electricity	Electricity	Electricity
9. Operational Energy Use (B6) of the Tunnels + Furnival St. (divided by GIAm^2 of Furnival St. only) (kWh/m^2/yr GIA)	424	395	324
10. Estimated Whole Building Operational Carbon for	883	822	675

building lifetime (B6) ($kgCO_2e/m^2$ GIA)			
11. **Total WLC Intensity** (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) Module B7 is not considered	**2,026**	**1,918**	**1,977**
12. Upfront embodied carbon (A1-A5) (tCO_2e)	1,318	1,309	2,118
13. In-use embodied carbon (B-C, excl. B6 & B7) (tCO_2e)	918	980	1,173
14. Operational carbon for building lifetime (B6) Tunnels + Furnival St. (tCO_2e)	1,747	1,748	1,746
15. **Total WLC** (incl. B6 and pre-demolition) (tCO_2e) *Module B7 is not considered*	**4,009**	**4,077**	**5,117**

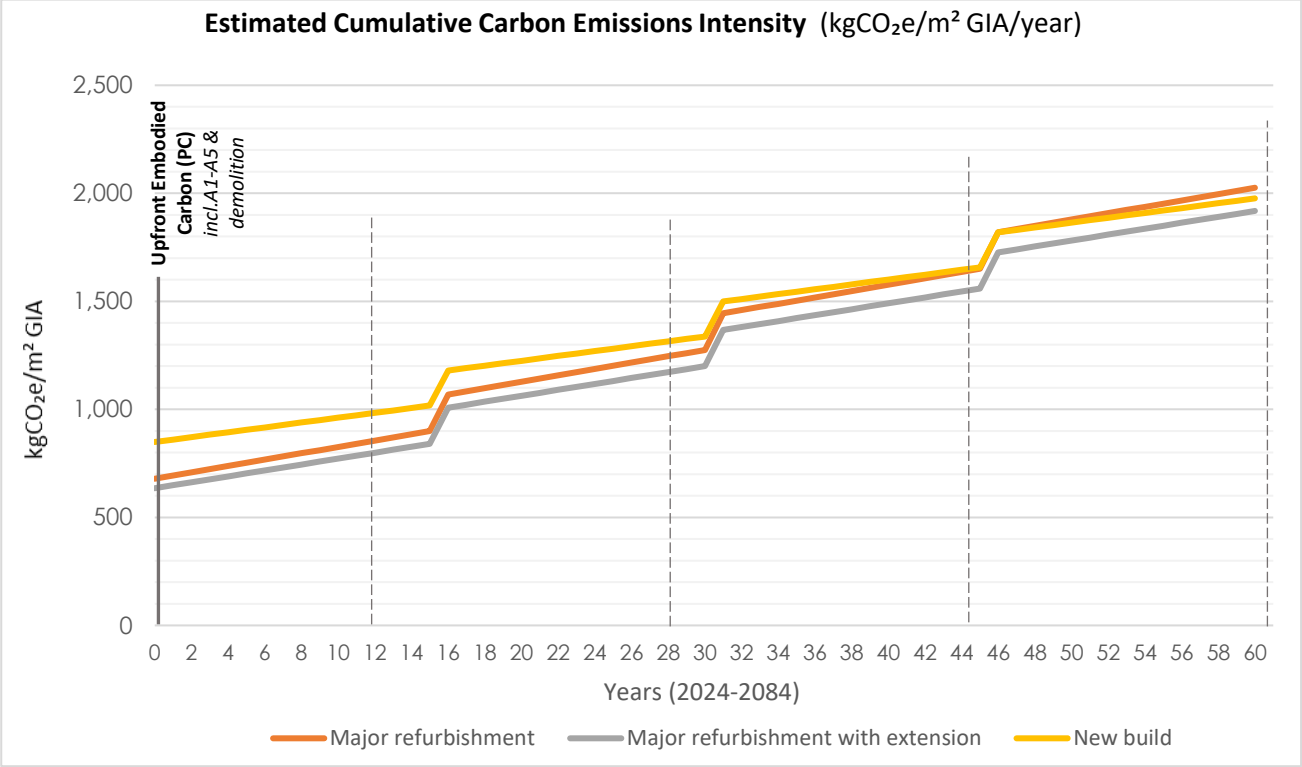


Figure 12. Estimated Cumulative Carbon Emissions Intensity

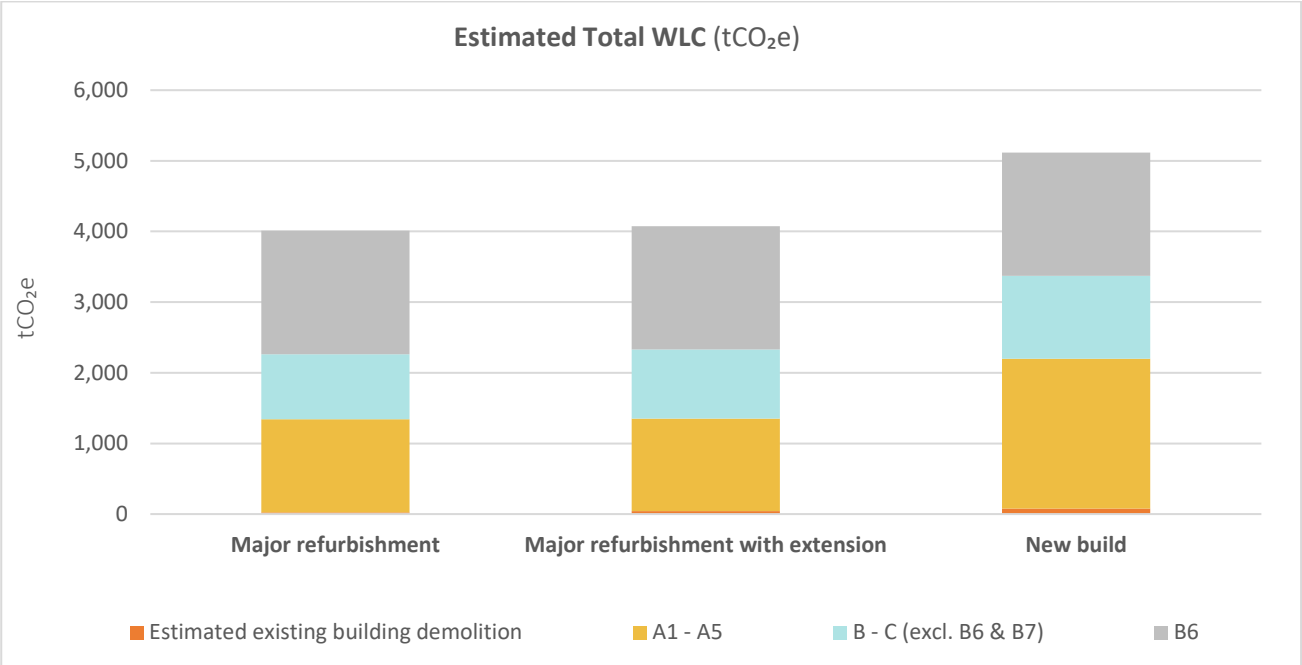


Figure 13. Estimated Total WLC

408. The study found marginal differences between the two refurbishment options. Option 2 is able to achieve better operational performance and reduced upfront emissions compared to Option 1 due to a more efficient spatial arrangement and structural grid and the significant strengthening work Option 1 would require to accommodate the MEP equipment.

409. Total upfront emissions increase by ~1,000,000 kgCO2e from Option 2 to Option 3. For Option 3, 8% of the total WLC emissions (393,528 kgCO2e)are attributed to the new substructure works (inc. 3 basement levels).

410. Option 2 and 3 include capacity for additional sustainability benefits such as a blue roof which allows water retention and an amenity terrace with greening for the staff.

411. The new build option was chosen as the preferred option based on overall benefits including “constructability, maintenance and space utilisation.” Fitting the required plant within the existing structure of 40-41 Furnival St. is complicated, in part due to restricted floor heights, and would require strengthening works which have an associated carbon impact. As new build area increases operational performance is also predicted to improve as plant specification/layout can be optimised. The new build option offers the greatest increase in floor area which allows the most flexibility in spatial design terms and improved facilities including:

a) Improved accessibility and public realm

b) Larger area of amenity terrace for staff and additional greening
c) Increased plant space which;
    - simplifies provision of future heat network connection
    - improves smoke management and stair pressurisation increasing potential visitor capacity.

Development Proposal

412. The Circular Economy Statement (CES) submitted describes the strategic approach to the incorporation of circularity principles and actions according to the GLA Circular Economy Guidance.

413. Approximately 90% of the existing site (by area), including the entire tunnel network will be retained. 31-33 High Holborn (Camden) will be largely retained. The Tunnels are being refurbished and adapted to offer an adaptable and flexible space for future occupants.

414. Outline proposals for incorporating circular economy principles:
    - All internal partitions (other than fire lobbies) can be dismounted and altered for future adaptation
    - Materials used will be high quality and high durability to ensure long service life and minimise the impact of replacement with new Tunnels / shaft linings designed for a 120-year design life.
    - Various building elements, including lifts, glass balustrades, façades, and steel frames, have been designed for disassembly and recycling
    - Services are designed for ease of maintenance and replacement. Demountable sections have been incorporated into the glass block façade for plant replacement.
    - Generally, all MEP items can be de-commissioned and removed for re-use or recycling. Ductwork will be installed with flanges and pipework which will aid in the deconstruction
    - Steel frames supporting the first-floor gallery, spiral stair and façade at Furnival Street can be adapted, strengthened, or finally deconstructed and reused, if necessary in future.
    - Where possible, precast reinforced concrete elements (likely to include walls, infill panels and Tunnels lining structure) will be discussed with the contractor at the next stage. These can be prefabricated off site reducing waste and emissions.

415. Figure 2 of the Circular Economy Statement summarises a list of circular economy commitments/approaches as follows:

a) The development aspires to achieve the GLA recommended target of minimum 20% of all new material being reused/recycled content by value.
b) Specific materials targets for investigation at developed design stage:
    - 20% of new materials used should contain reused/recycled content by value (as per GLA recommended target)
    - 25% GGBS in concrete
    - 20% recycled content in steel
    - 60% recycled content in plasterboard
    - 97% recycled content in rebar
    - 35% recycled content in aluminium
    - Materials from suppliers who participate is responsible sourcing

c) schemes such as the BRE BES 6001:2008 Responsible Sourcing Standard will be prioritised.
d) Exploring prefabricated and modular design options throughout the detailed design phase to minimise construction waste; specifically, precast reinforced concrete (RC) elements, including walls, infill panels, and the Tunnels lining structure.

416. A pre-demolition and retrofit audit was undertaken to assess which materials can be re-used or recycled in order to retain maximum value and advise on material recovery strategies.

417. Total demolition waste forecast is 36,257 Tonnes of with an estimated recovery rate (reuse/recycling) of circa 95%. Concrete that will be crushed accounts for 90% of total waste by weight. Plant equipment, furniture and Bakelite have been designated for possible reuse with all other items proposed for recycling at a raw material level. Further details will be provided at detailed design stage.

418. The ‘material recovery options’ table indicates how materials will be segregated and which will be sent to specialist recyclers for further processing. The development will submit a Waste Management Plan and advise the contractor of the targets to be achieved.

419. A number of specific elements have been earmarked for reuse, depending on their condition:
    - cast iron shaft rings repurposed as lift shaft cladding
    - shaft linings will be reused as architectural elements lining the new stair and lift shaft.
    - Brickwork and concrete louvres to rebuild 39 Furnival St.

420. Updates to the detailed Circular Economy Statement are required by condition, prior to commencement (excluding demolition), and post completion, in line with the Mayor's guidance on Circular Economy Assessments. The statement is to include details of elements recovered for reuse on/off site and the demountable internal partitions.

BREEAM

421. Emerging City Plan 2040 Policy DE1: Sustainability Standards requires proposals for major development to achieve a minimum BREEAM rating of "Excellent" (70% of credits) and aim for "Outstanding" (80% of credits) against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City's priorities (energy, water, pollution, and materials) as well as the climate resilience credit in the Waste category.

422. Given the specific nature of the development and following discussion with CoL officers and BREEAM the assessment type selected is: BREEAM Non-Domestic Refurbishment and Fit Out 2014 Bespoke.

423. The development is targeting a high-scoring 'Very Good' rating, which does not meet City Plan policy of minimum 'Excellent'. The pre-assessment results show a target score of 67% and a potential score of 81% (Outstanding) if all the additional credits identified were achieved. This demonstrates good scope to achieve an 'Excellent' rating as a minimum. Options for additional credits are to be incorporated into the project cost plan to assess the costs required to achieve an 'Excellent' rating.

424. Pre-assessment results show the development to be on track to achieve high credits in the Water category and moderate credits in the Energy, Materials and Pollution categories.

425. A post construction BREEAM assessment is required by condition.

Whole Life-Cycle carbon emissions

Policy and guidance

426. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encourages the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment (WLCA). The assessment captures a building's operational carbon emissions (from regulated and unregulated energy use), as well as embodied carbon emissions, (i.e. those associated with raw material extraction, manufacture and transport of building materials and construction) and emissions associated with maintenance, repair, and replacement as well as dismantling, demolition and eventual material disposal. The Circular Economy strategy is therefore closely interlinked, addressing reuse and

recycling of existing buildings and materials, as well as the longevity, flexibility, and adaptability of the design proposal.

427. Core Strategic Policy CS15 of the City's Local Plan requires "*all redevelopment proposals to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and "end of life" phases of development.*"

The application proposal:

428. Approximately 75% of the proposed development by floor area (GIA) is made up of retained existing entities (all tunnels, shafts and 31-33 Holborn buildings), whilst the other 25% (Furnival St) is new build.

429. The proposed change of use would transform the Tunnels into a cultural venue with the exhibition divided broadly into two key components – a permanent historical section occupying the 'Streets' tunnels and a flexible digital component located in the 'Avenues'. Within the flexible avenues spaces innovative digital led experiences will be developed, sometimes combined with physical installations. These experiences will be short to medium term exhibitions and one-off events. Detailed exhibition content would be developed during the refurbishment period. The DAS describes the proposal as follows: *The seamless integration of state-of-the-art audio-visual technology will form a key element in the delivery of a successful immersive and interactive visitor experience, with a combination of LED screens, projectors and advanced sound system technology built to create best in class immersive experiences.*

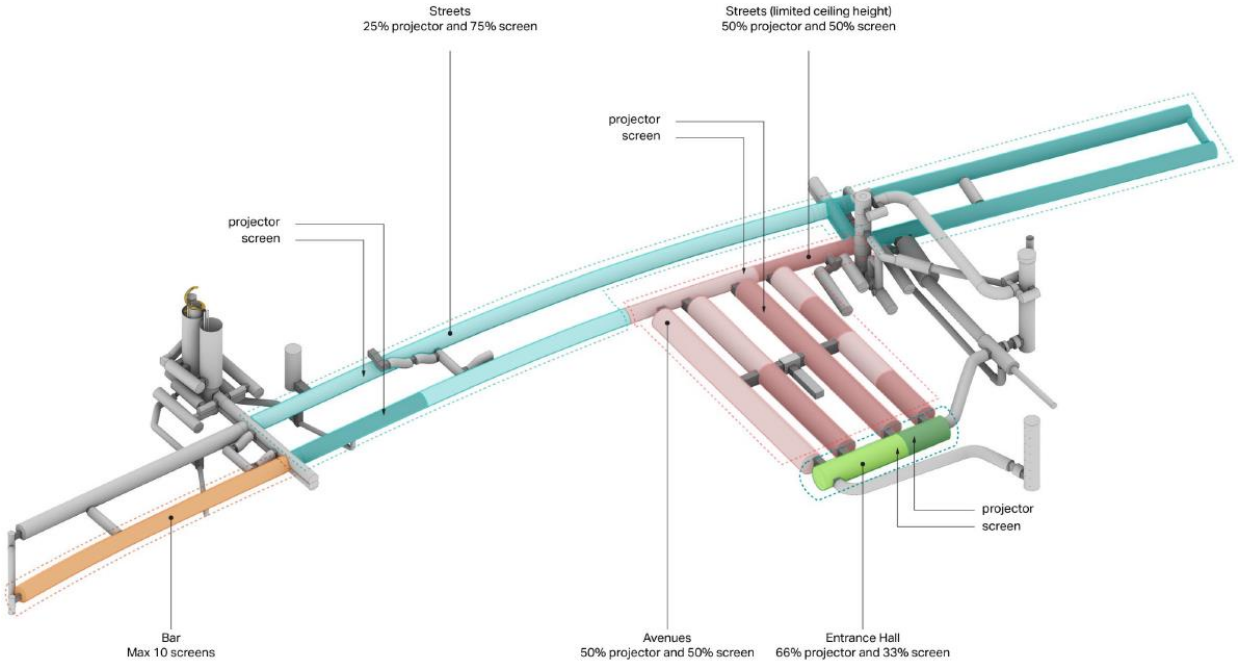


Figure 14. Indicative projectors in the tunnels

430. The WLCA lays out three potential fit-out scenarios based on differing extents of audio-visual (AV) equipment (indicative final fit-out designs) which result in a very wide range for both embodied and operational carbon emissions. The extent of AV will depend on the museum operator and programme of temporary (short or medium term) exhibitions and special events, changing throughout the year. The WLCA and Energy Statement have been based on the medium use scenario.

Table. 8. Implications of different Scenarios

Scenario	Summary	Implications
Low	Base building/CAT A design (inc. heating, cooling, ventilation, lighting and fixed energy loads such as lifts) operating with anticipated occupancy and opening hours but only limited audio-visual (AV) equipment installed.	Includes audio-visual and other equipment for the Heritage Museum in the Streets, and the Bar, and limited use of projectors in the Avenues. Many of the cultural use scenarios fall in this category.
Medium	Base building plus a mix of low energy AV systems including some LED screens and high-fidelity projectors. Based on anticipated occupancy and opening hours. Improved HVAC efficiencies due to equipment running at part load and the use of cooling from ambient air temperatures.	Balanced use of projector technology and LED. Includes higher LED loads including music events or immersion visual experience, set out in the Cultural Plan, but does not include the full extent of AV provision allowed for the highest case. This is a conservative position that allows much cultural flexibility.
High	Based on anticipated occupancy and opening hours. Base building plus, a higher amount of AV equipment with a high proportion of LED screens.	The Highest case relates to the possible installation of a fully immersive LED solution installed in up to 50% of the surface area of the Avenues. This level of energy use may happen for some cultural installations but is not expected to be applied for long periods of time.

The table below provides a breakdown of screen area and number of projectors by area for each scenario.

	Low scenario		Medium scenario		High scenario	
	Screen area (m2)	No. of projectors	Screen area (m2)	No. of projectors	Screen area (m2)	No. of projectors
Entrance Hall	0	1	102	12	204	23
Avenues	0	10	1104	63	2208	126
Streets	0	10	788	33	1575	33
Total	**0**	**21**	**1994**	**108**	**3987**	**182**

The table below shows a comparison of upfront and total WLC carbon figures by scenario and with GLA Retail Benchmarks.

TOTAL kg CO_2e/m^2 GIA	Module A1-A5 (Excluding Sequestered Carbon)	Modules B-C (Excluding B6 & B7)	Modules A-C (Excluding B6 & B7; Including Sequestered Carbon)
Low Scenario	581	380	961
Medium Scenario	745	914	1,652
High Scenario	906	1,427	2,333
GLA Benchmark	<850	<200	<1050
GLA Aspirational Benchmark	<550	<140	<690

431. Total embodied WLC emissions per m2 for Medium and High scenarios are substantially higher than the GLA Retail Benchmarks. It is noted that retail benchmarks are not representative of this unique development but are considered the most relevant by the applicant and agreed by the 3rd party reviewer of the WLCA.

432. The detailed WLC and energy assessments are based on the medium scenario. The final fit-out is currently uncertain but will be developed throughout the detailed design stages and finalised once museum operators are on board. A detailed whole life-cycle carbon assessment confirming the proposed fit-out plan including quantities of audio-visual equipment and predicted frequency of events or special exhibitions as well as the associated carbon impacts is required by pre-commencement (exc. demolition) condition.

Table 9. Life-cycle carbon emissions by module based on the medium scenario.

Estimated Whole Life Carbon Emissions (over 60-year lifespan)	**Upfront Embodied Carbon (A1-A5 excl. sequestered carbon)**	**Total embodied Carbon (A-C excl. B6-B7; incl. sequestered carbon)**	**Module B1-B5**	**Whole Building Operational carbon (B6-B7)**	**Total Whole Life Carbon (inc. B6)**
Development Total (kg CO2e)	7,911,775	17,554,764	9,087,567	11,582,588	29,137,352
Total per m2 (kg CO2e/m2 GIA)	745	1,652	855	1,090	2,742

433. Total WLC emissions (embodied and operational) are estimated at 29,137,352 kgCO2e.

434. Embodied carbon emissions total 17,554,764 kgCO2e with MEP equipment accounting for approximately 70% (~15% is typical for an office scheme according to research by LETI). Two-thirds of those embodied emissions from MEP are attributed to maintenance and replacement.

435. The sustainability consultants included an estimated embodied carbon comparison with the Museum of London and Liverpool Everyman Theatre to provide context with buildings of a more similar programme to the proposed development. A comparison of operational emissions was not provided.

Table 10. Estimated embodied carbon comparisons

	London Tunnels Medium Scenario	Museum of London	Liverpool Everyman Theatre
Year	2029	2026	2013
Size (m2 GIA)	10,625	49,996	4,690
Visitors/year	2,000,000 (target)	2,000,000 (target)	120,000 (actual)
Embodied carbon (A-C) total (kgCO2e)	17,555,000	29,997,000	4,845,000
Embodied carbon per m2 over 60-year period (kgCO2e)	1,652	600	1,033
Embodied carbon per visitor over 60-year period (kgCO2e)	146	250	670

436. The Tunnels has the highest embodied carbon ‘intensity’ (rate per m2) of the venues assessed. The underground nature and elongated form of the tunnel

network naturally requires extensive ventilation/cooling and long servicing runs in order to be made into a viable tourist attraction. The comparison table shows that if these venues attract (close to) their target (or actual) visitor numbers then over a 60-year period the Tunnels attraction would have a lower embodied carbon cost per capita than these other indicative cultural venues. The embodied carbon cost (per capita) for the tunnels becomes less than the Museum of London after around 35 years.

Furnival Street New structure

437. A variety of structural systems were considered during design phase table and evaluated against project brief, architectural design intent, programme, sustainability, and cost. Relative carbon intensity was assessed at high-level based on previous experience. The primary system chosen is a concrete frame with post-tensioned concrete slabs. Steel and CLT options were discounted before carbon and detailed structural design was undertaken as they cannot achieve the architectural intent for structural floor zone and spans. The choice is justified by the intention to allow greatest flexibility in floor space and plant equipment layout.

438. The strategy to minimise embodied carbon includes the following measures:
- Hybrid elements of structure with a variety of structural framing and floor plate types has been proposed to optimise efficiency based on parameters such as loading requirements
- Prioritisation of prefabricated elements, likely to include walls, infill panels and tunnel lining structure, to minimise material use and thereby reduce construction waste and carbon emissions
- Floor load allowance to be refined following clarification of MEP plant in next stage. To avoid overspecification of predicted loads;
- Post-tensioned system reduces slab thickness and requirement for beams
- Refrigerant specified for cooling system has very low global warming potential of <1 – a negligible effect on global warming

439. The design and specifications will ensure that environmentally sensitive (non-toxic) building materials are used throughout. Specifically, the design and specification of materials used internally will be based on the use of products that contain low levels of or no Volatile Organic Compounds (VOCs). This is important for health and wellbeing as well as carbon reduction.

440. Design optimisations will be explored at detailed design stage to reduce carbon emissions including:
- Further reduction of superstructure PT slab thickness
- Non-metallic ductwork
- Alternative chilled ceilings

- Potential to source reused steel sections
- Reclaimed raised access flooring.

Operational energy strategy and carbon emissions

Policy and Guidance

441. London Plan Policy SI 2 Minimising greenhouse gas emissions sets out how major developments should be net-zero carbon by "reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
    - be lean: use less energy and manage demand during operation
    - be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
    - be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
    - be seen: monitor, verify and report on energy performance"

442. Policy SI2 also states that "Major development proposals **should calculate and minimise carbon emissions** from any other part of the development, **including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.**" [emphasis added]

443. Development Clause 9.9.2 expands on the priority of the energy hierarchy which is to "***minimise energy demand****, and then address how energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to* ***reduce peak energy loadings***." [emphasis added].

444. London Plan Policy SI4 Managing Heat Risk states that Development should minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. Through an energy strategy, development should demonstrate how they will reduce internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

Application proposal:

445. For the medium scenario, total operational carbon emissions (B6 & B7) are calculated at 11,582,588 kgCO2e or 1090kgCO2e/m^2 - about 40% of total WLC emissions.

446. The proposed development employs a highly efficient and fully electric HVAC system of air source heat pumps, cooling towers, and water-cooled chillers with heat recovery, which help reduce carbon emissions.

447. Avenues and Streets supplied with minimum fresh air via combined general ventilation and smoke control ductwork. Duct sizes are minimised to the smoke requirement to save material and embodied carbon and CO2 control in air handling units and Avenue zones help minimise energy consumption.

448. The operational energy of the proposed development is affected significantly by the final fit-out and specific equipment associated with exhibitions/events as demonstrated in the Low, Medium, and High scenarios set out above.

449. Audio-visual equipment has a very significant impact on energy consumption for the building. Compared with the base building adding projectors across the Avenues, Streets and Entrance Hall leads to an increase in annual energy consumption of 188% from 67 kWh/m2 to 126 kWh/m2. This shift also increases the cooling demand by over 700%.

450. The adopted GLA energy assessment guidance (2022) requires developments to calculate *Energy Use Intensity* (EUI), a measure of total energy consumed in a building annually including regulated and unregulated energy use, as well as the space heating demand. For offices, the GLA sets a target EUI of 55 kWh/m2(GIA)/year, and a space heating demand of 15 kWh/m2(GIA)/year whilst the UKGBC target is 90 kWh/m2/year. As there are no industry targets for cultural buildings and given the unique nature of the Tunnels, these targets is for guidance only.

Table comparing estimated annual energy use intensity for the proposal scenarios with office targets.

				Office Targets		
	Low scenario	**Medium scenario**	**High scenario**	**GLA Target**	**UKGBC target 2025-30**	**UKGBC target 2030-35**
Whole building energy intensity kWh/m2GIA	67	126	191	55	115	90

451. The current anticipated competition date for the Tunnels is 2029. Against the 2025-30 target, the EUI for the medium and high scenarios is 10 and 66% higher respectively. Against the 2030-35 target, the medium and high scenarios are 40% and 112% higher respectively.

452. The Tunnels have low heating loads due to the insulation/thermal mass provided by the surrounding soil. Cooling demand for the site is predicted to be very high due to large visitor numbers and intensive AV equipment in a confined environment. The maximum predicted cooling load is 1.8MW.

453. The following strategy has been designed to optimise cooling delivery and minimise waste heat rejection (impact on the local heat island) but there is a significant embodied carbon footprint associated with the extent of plant required:
- Heat recovery has been implemented wherever possible to minimise heat rejected and improve system efficiencies.
- Heat is rejected by highly efficient cooling towers and water source chillers, circulating chilled water
- Chilled water panels located throughout the 'avenue' and streets' tunnels absorb heat locally helping to capture heat from equipment such as screens and projectors.
- The inclusion of chilled panels enables cooling during unoccupied hours using only the cooling towers, avoiding energy usage associated with operating the chillers.
- Rejected heat from the Tunnels will be able to pre-heat air in order to heat above ground areas of the building and provide hot water.

454. The application proposal has been designed to achieve an overall 41.4% reduction in regulated emissions compared to the notional existing building based on GLA energy guidance, meeting the London Plan requirement of 35% minimum on site.

455. The proposal does not meet the GLA requirement for net zero carbon, so a carbon offset payment in required. This has been provisionally calculated based on the medium scenario as £123,951. An updated energy assessment based on fit-out with a high level of AV equipment should be undertaken prior to occupation and the offset payment calculated accordingly. The energy statement should be secured under condition. The payment should be secured through S106 agreement.

456. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

Be Lean

457. The first step of the energy hierarchy is to reduce demand through energy efficiency measures. The majority of the development utilises existing buildings. Due to the existing heritage of the projects, has not been possible to update the material in the actual Tunnels however these already benefit from the insulation provided by the soil surrounding the structure.

458. At application stage, the proposed energy demand reduction strategy ('be lean') only achieves an operational saving of 0.3%, well below the 15% GLA requirement for commercial buildings.

459. This is due largely to the nature of the tunnels (subterranean, long, enclosed spaces), combined with the operational requirements of the proposed change of use to museum/event space – high visitor numbers and AV equipment requiring ventilation and cooling.

460. The energy efficiency measures proposed exceed minimum building regulation requirements and include:

- Highly efficient building fabric at Furnival Street
- Centralised ventilation with heat recovery
- All spaces will include 100% low energy lighting with lighting controls/sensors
- Smart control systems and building management system to ensure efficient control and monitoring of MEP services to minimise energy waste.

Be Clean

461. The applicant team has consulted with the local heat network operator (Citigen). At present there is no heat network infrastructure planned for the area. In accordance with GLA guidance a low temperature hot water system has been specified and the plant room designed to facilitate heat network connection in future. Evidence of provision for connection to a future heat network is required by an obligation.

462. Utilising waste heat through connection to a heat network, direct transmission to a nearby building or otherwise, is key to reducing the environmental impact of the proposed development. An obligation is to be included which requires the development to thoroughly explore possible options for beneficial rejection of waste heat.

Be Green

463. The proposed development employs a fully electric HVAC strategy using highly efficient air source heat pumps and water-cooled chillers which help reduce carbon emissions.

464. Potential for roof mounted PV at Furnival Street was assessed but roof area is limited. The largest area is occupied by plant which requires ventilation so cannot accept PVs above. The other roof area has been prioritised as a staff amenity terrace as the only outside space available on the site.

Table 4-3 – Regulated Carbon Dioxide Savings from Each Stage of The Energy Hierarchy (SAP10.2 Carbon Factors)

	Furnival Street (New Build)	31-33 High Holborn (Existing Build)	Kingsway Tunnels (Existing Build)	Site Wide		
Total	**Regulated Emissions (Tonnes)**	**Regulated Emissions (Tonnes)**	**Regulated Emissions (Tonnes)**	**Regulated Emissions (Tonnes)**	**Unregulated Emissions (Tonnes)**	**% Reduction in Regulated Carbon Emissions**
Baseline emissions (Tonnes CO_2)	1.1	3.8	69.4	74.2	22.8	-
Be Lean: Emissions after energy demand reduction (Tonnes CO_2)*	1.0	3.9	69.1	74.0	22.8	0.30%
Be Clean: Emissions after energy efficient supply (Tonnes CO_2)*	1.0	3.9	69.1	74.0	22.8	0.3%
Be Green: Emissions after renewable energy (Tonnes CO_2)	0.5	3.6	39.4	43.5	22.8	41.4%

465. A detailed Whole Life-Cycle carbon assessment incorporating improvements achieved through the detailed design stage, and a confirmation of the post-construction results are required by conditions.

Urban Greening and Biodiversity

466. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

467. The existing site has negligible ecological value. The proposal provides greening at roof level, on the staff terrace and plant room roofs, and a green wall on the south façade of 40-41 Furnival Street. At level 4, a planting palette of flower rich perennial planting, including small trees/shrubs and climbers, at level 5, an intensive roof sown with a wildflower seed mix with plug planting. These measures will improve public realm quality and achieving a UGF of 0.135.

468. Project constraints make it difficult to achieve the recommended UGF of 0.3;
- Proposed development is predominantly underground

- Constrained form, in part due to rights of light envelope, provides limited area to provide more greenery without away from the only outdoor space available for the staff.

Proposed Roofs	
Extensive Green Roof Area	31.2 m^2
Intensive Green Roof Area	24 m^2
Green wall	13.5 m^2
Blue Roof Available Attenuation Volume	4.9 m^3
Rainwater harvesting tank	8 m^3
Photovoltaic Panels	None

469. Details of the quality and maintenance of the proposed urban greening are required by conditions (1. Rainwater attenuation and biodiversity, 2. Visual amenity).

Climate Change Resilience

Water resources

470. The development incorporates best practice technologies to limit its water consumption to a minimum. Including:
- Water leak detection and automatic shut off valves
- Water efficient / low flow sanitary fittings
- Rainwater harvesting for irrigation/WC flushing

Flood Risk, Water Management and Drainage

471. The GLA's London Plan 2021 Policy SI 12 gives specific guidance on the provision of flood resilience which is relevant to this development with Policy SI 13 noting that developments should aim to achieve greenfield runoff rates and ensure run-off is managed as close to the source as possible.

472. Local Plan 2015 policy CS18 seeks to "reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2040.

473. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk). As such the application site is at low risk of fluvial and tidal flooding. The risks of groundwater flooding are also considered to be low, however, given the subterranean nature of the tunnels appropriate

waterproofing and underfloor drainage and pump systems are proposed to collect any remaining seepage and redirect it to the public sewer system.

474. The proposed drainage strategy includes capturing rainwater landing on roof levels and remaining impermeable areas and directing this to the blue roof system or via downpipes/pipe network to storage systems (tanks) before being discharged to the existing combined public sewer in Furnival Street. Systems have been sized to accommodate the 1 in 100-year storm rainfall event with a 40% additional allowance for climate change.

475. The proposed maximum discharge rate from the Proposed Development is 1.5 l/s, which is as close as technically feasible to greenfield run-off rates given the nature of the development and offers a significant betterment on existing pre-development run-off rates.

476. The Lead Local Flood Authority and Thames Water have been consulted and recommended conditions and informatives are to be attached.

477. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2040 and policies SI12 of the London Plan.

478. Although the likelihood of flooding is considered low for the development, the consequences of flooding in the Tunnels is high so the following are considered:
- Appropriate waterproofing measures should be deployed to manage risk of groundwater seepage.
- Any routes for surface water ingress to the Tunnels (i.e. via the shafts) are protected by finished floor levels that rise to a minimum of 150mm above adjacent street levels;
- Where practicable, all electrical and life safety infrastructure is provided a minimum of 300mm above finished floor levels, or where not practicable, equipment is designed to be flood resilient;

479. A Flood Evacuation Plan was submitted over the course of the application which has been reviewed by CoL Environmental Resilience Officer. The proposed egress and access routes both internal and external, have been identified go through unflooded areas in compliance with CoL Flood Emergency Plans for New Developments Planning Advice Note (June 2020). The site is low flood risk and the possible flooding mechanism of the tunnel (groundwater and burst watermains) fall into residual risk (i.e. it is defended against and will only result if those defences fail). The two routes with distinct exit points helps to mitigate this risk yet further. Officers would therefore consider this development to meet the policy in this area (flood egress and access). Further

details would be required to be provided in the AMP under Section 106, to ensure safe egress of all groups of people is being considered.

Heat Stress

480. Policy SI 4 of The London Plan (2021) states that major development proposals should reduce potential overheating, and reliance on air-conditioning systems, and demonstrate this in accordance with its cooling hierarchy.

481. The most prescient risks to the building of these changes are overheating, and increased cooling demands & costs. Thermal modelling has been carried out as part of the design process to ensure the impacts of these heightened temperatures can be managed and minimised.

482. 100% low energy LED lighting will reduce internal heat gains whilst an efficient water-cooled system allows mitigation of overheating space. All electric cooling plant minimises carbon impact of additional cooling requirement.

Urban Heat Island

483. All air handling systems will be equipped with heat recovery systems to reduce the amount of heat expelled to the external environment.

484. Water Greening on the Furnival Street terrace will contribute to a reduction in the heat island effect as plants mitigate retention of heat.

Natural Capital and Pest & Diseases

485. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, with detailed modelling and planting plans required by conditions including comparison against the UK Climate Projections UKCP18 to 2080 (tools and data that show how the UK climate may change in the future, based on potential emissions scenarios).

486. Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates how the development will be resilient and adaptable to predicted climate conditions during the lifetime of the development. This condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit.

<u>Conclusion on Sustainability</u>

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

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

488. Demolition of both buildings on Furnival Street is deemed acceptable, justified by the practical constraints of the construction process, achieving greater access to the Tunnel network (for visitors and equipment) and the greater servicing efficiencies which can achieved through the size/layout of a new build.

489. The whole life-cycle carbon assessment sets out the large, embodied carbon cost of the refurbishment and fit-out works as well as plant replacement over life-cycle period of 60 years. High energy and cooling demand are driven by high visitor numbers and extensive AV equipment proposals. However, a highly efficient, water-based and localised cooling system with heat recovery has been designed to manage overheating within the tunnel network and reduce operational energy.

490. The London Tunnels proposal offers a unique visitors attraction in a strategic location for a new cultural offering. The scheme would bring an underutilised piece of historic infrastructure with a storied past into public use, bringing economic benefits to the area. The change of use of deep level tunnels designed for emergency shelter and secure telecommunication to a cultural exhibition and event space offering an immersive audio-visual experience is technically challenging and requires an extensive amount MEP equipment to accommodate the high visitor numbers targeted/anticipated.

Security

491. London Plan Policy D11 requires consultation with the City of London Police to identify the community safety needs and maintain safe and secure environments. Local Plan Policy CS3 and Emerging Policy S2 highlight the needs for the City to be secure from crime, disorder and terrorism thereby increasing public and corporate confidence in the city's role as the world's leading international financial and business centre.

492. Concerns have been raised by residents regarding the security and safety impacts of the proposed development.

493. A Security report has been prepared and submitted as part of this application. The Security Strategy focuses on internal attacks in the tunnels and proposes mitigation measures such as the introduction of a bag scanning and searching system at check-in of visitors. All visitors would be required to pre-book their visit, with information provided at the booking regarding the security process and a list of prohibited items. Locker rooms would be available at ground level, before entering the exhibition space, where visitors would lock their personal staff that cannot be carried inside the tunnels. A grouping system would be adopted to control visitors journey and access to spaces. Video Surveillance Systems (VSS) will monitor the site through Security Control Room (SCR). It is not anticipated to have people queuing outside the building and therefore Hostile Vehicle Mitigation (HVM) has not been proposed for implementation.

494. Visits to the bar would be also pre-booked. The bar is only accessible via Fulwood Place, the secondary entrance in Camden, where security control would be in place. Access from the bar to any other areas of the tunnels would not be available outside of the exhibition spaces operational hours.

495. City Police and Counter-Terrorism Security Advisers have reviewed the information provided and have made a number of recommendations to prevent potential attacks on site with advice given for ongoing consultation with them as the plans for the site develop. Officers consider that the application complies with London Plan Policy D11, Local Plan Policy CS3 and Emerging Policy S2. Recommendations for Operational and Events Management Plan have been made, including crowd management, dispersal, levels and system of control on site that would help prevent antisocial behaviour, to be secured via Section 106. Informatives have been also recommended for the continuous involvement of the City Police and CTSA at the detailed design stage of the scheme.

Suicide Prevention

496. Local Plan policy CS3 requires that security and safety measures are of an appropriate high-quality design. The City Corporation has recently adopted the Planning Advice Note “Preventing Suicide from High Rise Buildings and Structures” (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades.

497. Policy DE4 of the draft submission City Plan 2040 advises that appropriate safety measures should be included in high-rise buildings, to prevent people from jumping or falling.

498. The proposal includes a roof terrace at level four, which would only be accessible to staff working on-site.

499. The Design and Access Statement confirms that the roof terrace has been designed in line with the adopted Advice Note with the provision of a balustrade of 1.4m in height to the perimeter of the terrace, exceeding the 1.1m required by building regulations and in line with the 1.4m suggested by the Planning Advice Note. Perimeter planters are also proposed to be embedded in the floor to restrict and deter access to the boundary of the useable terrace.

500. The terrace would not be accessible to any member of the public which provides a more controlled use of the outdoor space. However, a condition has been recommended for details of suicide prevention measures to be submitted and approved by the City prior to the first occupation of the building.

501. The proposal is considered to comply with Local Plan Policy CS3 and draft City Plan Policy DE4 and the recommendations of the Planning Advice Note. A condition has been imposed as mentioned above.

Fire Statement

502. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5 requires development to incorporate safe and dignified emergency evacuation for all building users with a minimum of one lift per core to be a suitably sized fire evacuation lift.

503. The application is accompanied by a Fire Statement in accordance with London Plan Policy D12B for major developments and the fire safety regulations.

504. The application predicts an annual visitation of two million on site. The tunnel exhibition visitors are estimated to reach maximum 750 people/hour and the visitor of the underground bar is estimated to be 120 people/hour. The Fire Statement clarifies that the conventional British Standards guidance would potentially not be adequate for achieving optimal fire safety levels due to the unique nature of the proposed development. Instead, an engineering and risk-based design approach has been suggested, along with the implementation of a Basis of Design (BoD) document to guarantee adherence to fire safety regulations.

505. A water-based suppression system is proposed to be installed which would be activated in the event of a fire to extinguish or control the fire. The presence of fire/smoke shutters in the tunnels ensures that there are several layers of fire separation between the occupants and the fire source. This compartmentation allows the occupants to safely make their way towards the protected lobbies of the evacuation shafts. The lobbies next to the lift shafts at the two entrance points would be designated as safe areas equipped with fire-resistant materials

and would be pressurized to prevent smoke accumulation in case of sprinkler system failure. These refuge areas can accommodate up to 50% of the tunnel's occupants for evacuation through lifts or stairs.

506. In line with London Policy D5, evacuation lifts would be available at both entrances. At Furnival Street the round lifts would serve the east side of the tunnels and levels 1 and 2, and the lifts at the rear would serve the upper levels of the Furnival buildings for evacuation to Furnival Street. Fulwood Place works as an emergency exit to the west side of the tunnels. Vertical evacuation would be available on this side as well that leading to Fulwood Place and then to High Holborn.

507. Incorporating smart signage and wayfinding systems linked to the detection system will help guide occupants to the protected lobbies based on the fire's location.

508. The CoL District Surveyors have reviewed the application and the Fire Statement and raised no objections.

509. Given the somewhat unique nature of the proposal and the proposed use, officers have sought London Fire Brigade's view of the submitted documents. The London Fire Brigade (LFB) is not a statutory consultee under the Town and Country Planning Act 1990, however due to the uniqueness of the site, the subterranean layout and the long underground distances Offices consider it pertinent to review measures in detail at an early stage. London Fire Brigade have therefore indicated various measures that would need to be considered post planning stage.

510. In general, LFB is content that the methodology outlined in BS 7974:2019 would be applied and this has been supported. As part of this methodology a Qualitative Design Review (QDR) process would be undertaken and LFB would expect to be involved in this process as a key stakeholder. This QDR process would take place post planning and would therefore fall under Building Regulations, i.e. post planning. Notwithstanding this however, a number of areas have been identified for review given concerns from LFB and the applicant has confirmed that these would be reviewed under any subsequent next step. These identified matters consist of the extended travel distances for occupant means of escape and firefighter access/intervention, radio communications coverage for firefighters and other emergency responders, Electric Powered Personal Vehicles and the construction phase fire safety.

511. Again, while these issues would be included as part of any QDR process, which takes place prior to a statutory Building Regulations consultation with LFB, they are discussed below for completeness.

512. With regard to the extended travel distances for occupant means of escape and firefighter access, given the nature of the existing tunnel infrastructure is such that travel distances hose laying distances for firefighter access/intervention will be extended beyond the distances recommended within guidance. LFB understand that extended hose laying distances are proposed to be addressed by providing an enhanced dry fire main system, similar to that provided for sub-surface railway tunnel infrastructure. While there is no objection to this in principle the technical details of this would need to be reviewed at QDR stage in conjunction with the LFB. Equally, in terms of the of the radio communications for firefighters while the applicant has confirmed that the scheme would have a Distributed Antanae System so that there will be mobile communications provisions in the tunnels, this would need to be confirmed under the QDR appropriately.

513. Regarding Electric Powered Personal Vehicles (EPPVs) officers have sought that the Accessibility Management Plan would secure the use of self-propelled/transit wheelchairs to limit the use of lithium-ion power units within the Tunnels. While this would be reviewed under the QDR process the Accessibility Management Strategy, proposed to be secured under any attached legal agreement, would secure an initial requirement to limit any potentially fire issues in the future. This would also be similar to the construction phase fire safety which would again require further consultation with the LFB at QDR stage, prior to Building Regulations, noting that a sufficient fire risk assessment to demonstrate compliance with The Order during construction would be required from the applicant.

514. With specific respect to LFB's view around compliance with planning policies given the depth of the premises from the access level and the fact that occupants other than persons of restricted mobility may experience difficulty in evacuating upwards over a height in excess of 30m, LFB recommend that consideration be given to providing additional evacuation lift capacity and this should be taken into account when undertaking the evacuation lift capacity assessment expected under London Plan 2021 Policy D5(B5). Officers have proposed a requirement in the proposed Access Management Plan to review the evacuation proposal against London Plan Policy D5 and as such adhering to the comments received from LFB. This would be secured within the attached legal agreement and would require submission of details for further review. For absolutely clarity however, while the QDR process lies outside of the planning process, officers have sought confirmation from the applicant that the above matters falling outside the scope of planning would be reviewed at this QDR stage and this reminder would be included within informatives attached to any permission.

515. The proposed development would therefore meet the requirements of Policy D5 and D12 of the London Plan.

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

516. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

517. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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

519. An Equalities Impact Assessment has been carried out in respect of the scheme by the applicant which did not identify potential for discrimination or adverse impact to any protected groups.

520. It has been considered that the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status. This would be achieved through measures such as:

- Pedestrian approaches to the entrances that are safe, segregated from vehicle traffic;
- The provision of step-free access to all parts of the building. Step-free access for staff use of the roof terrace in Furnival Street;
- Large passenger lifts with capacity to accommodate Type C mobility scooter access to the retail floors of Furnival Street and the cultural exhibition spaces in the tunnels;
- Provision of a type C mobility scooter parking space and charging point for staff at ground level;
- Secured accessible cycle parking for staff at ground floor of Furnival Street;
- Unisex wheelchair-accessible sanitary facilities for visitors upon arrival and to serve the retail areas in Furnival Street, and within the tunnels, including provision of a Changing Places toilet;
- Provision of a mix of male, female and unisex toilets including facilities for ambulant disabled users in Furnival Street and within the tunnels. Dedicated sanitary facilities in close proximity to the bar;

- Welfare facilities for visitors such as wheelchair-accessible baby changing facilities across the site;
- Provision of quiet spaces, a first aid room and seating within the final fit out of the tunnels;
- Wheelchair-accessible sanitary and refreshment facilities to serve the staff areas;
- Evacuation lifts for the safe and dignified evacuation of disabled users;
- Interior design, wayfinding strategy, design of exhibition spaces, lighting, acoustics and use of assistive technology to be detailed at the appropriate design stage taking into consideration the good practice guidance of BS 8300:2018 and PAS 6463:2022;
- The provision of resting points on routes longer than 50m from key points of arrival to the site's main entrance including accessible seating;
- The commitment to provide and additional blue badge parking on Furnival Street and the public realm improvement works (to be secured via Section 278 agreement).

521. Final detail of an Access Management Plan and Operational Management Plan would be secured by condition in order to secure the access requirements of all users are being met and to cover all aspects of the user experience from the provision of pre-arrival information in accessible formats, to the management of exhibition spaces (e.g. offering quiet visiting times) and staff training in accessibility and inclusion and in evacuation procedures.

522. The applicant has made a commitment to provide social benefits through the development that would promote equality and inclusion. Examples of such benefits include:

- Free school visits for schools around London;
- Partnerships with universities, institutions, local communities and underrepresented artists to co-curate the exhibition spaces
- Training opportunities accessible to all

523. Conditions, informatives and Section 106 and 278 agreements would be required to cover the accessibility management and operation of the exhibition space and other matters such as the accessible parking, resting points and inclusive procurements. An informative would be placed on the permission reminding future occupiers of their duty under the Equality Act 2010.

524. A suitable programme of highway works and conditions relating to construction and demolition management and logistics, noise and dust management are recommended in order to minimise the impact of the scheme on nearby occupiers and those with Protected Characteristics.

525. The proposed development has been assessed against policy GG1 of the New London Plan and would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

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

Human Rights Act 1998

527. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).

528. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. Although it is recognised that the development would have some impact on the amenities of the nearby residents and other adjoining occupiers, including by way of noise and disturbance during construction, it is not considered that, subject to conditions, the proposal would result in unacceptable impact on the existing use of nearby residential properties to an extent that would warrant refusal of the application on those grounds. It is the view of the officers that the provision of such a unique cultural and visitor attraction meets Local Plan ambitions and Destination City aspirations for an evening and weekend economy and in tandem with the wider socio-economic benefits brought by the proposed development the Minor Adverse impacts on nearby residential and commercial properties are outweighed and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

529. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on the amenity of adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

CIL and Obligations

530. 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. The applicant would enter into a separate S106 agreement with the London Borough of Camden.

531. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

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

533. 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).

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

535. Evidence was requested from the applicant to demonstrated whether the tunnels have been lawful use for six months over the last three years. No evidence has been provided for the LPA to determine this and they are therefore considered to be vacant for the purpose of calculating CIL.

MCIL2

lity in accordance with the yor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
2 payable	£702,793	£674,681	£28,112

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£461,625	£438,544	£23,081

City Planning Obligations			
Affordable Housing	£52,200	£51,678	£522
Local, Training, Skills and Job Brokerage	£31,320	£31,007	£313
Carbon Reduction Shortfall (*as designed*) *Not indexed*	£123,975 (based on the whole site)	£123,975	£0
Section 278 (Evaluation and Design Fee) *Not indexed*	£100,000	£100,000	£0
S106 Monitoring Charge	£4,086	£0	£4,086
Total liability in accordance with the City of London's policies	**£773,206**	**£745,204**	**£28,002**

City's Planning Obligations

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

Heads of Terms

a) Highway Reparation and other Highways Obligations (Highways Schedule of Condition Survey, site access, consents, licences etc)
b) Local Procurement Strategy (including inclusive procurement)
c) Employment and Skills Plan (demolition, construction and end use)
d) Delivery and Servicing Plan (including consolidation)
e) Travel Plan (Including Cycle Promotion Plan)
f) Construction Monitoring Cost (£30,935 – First year of development and £25,760 for subsequent years)
g) Carbon Offsetting (£123,975 - to be reviewed on completion and prior to occupation of the development)
h) Utility Connection Requirements
i) Section 278 Agreement (CoL). Scope to consider but not be limited to:

- provide a healthy streets scheme with consideration to providing a shared surface, increased footpath, additional street furniture, additional blue badge parking, and further public realm improvements
- improve sustainable transport to and across the area
- provide additional greening
- maintain the contra flow cycle lane
- maintaining access for emergency vehicles

j) Management Plan (including free or discounted tickets for certain groups) and Public Access and Events Management Plan (in relation to the cultural/temporary exhibition space)
k) Cultural Implementation Strategy (to restrict demolition until a Cultural Operator is secured)
l) Access Management Plan (for the operation of the site)
m) Waste Heat Transfer
n) Improving cycle infrastructure on public highway

537. Some financial contributions could be subject to proportional split with London Borough of Camden.

538. Officers request to be instructed to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

539. The London Borough of Camden has made provision of the following Heads of Terms to be included in their S106 agreement in accordance with their Local Plan/SPD:

a) Car free development
b) Construction Management Plan (CMP) and CMP implementation support contribution of £30,513 and CMP impact bond of £32,000
c) Travel Plan and associated monitoring and measures contribution of £11,348
d) Electric vehicle charging infrastructure (fast charger) contribution of £20,000
e) Delivery and Servicing Plan
f) Highways works contribution of £20,000
g) Off-site cycle parking contribution for cycle parking stands of £4,800
h) Pedestrian, Cycling, and Environmental Improvements contribution of £150,000
i) Micromobility Improvements contribution of £10,000
j) Restriction on coach bookings and picking up/dropping off of customers by coach outside site's entrance at 31-33 High Holborn.
k) Requirement to form a construction working group consisting of representatives from the local community

l) Carbon offset payment – estimated £123,951
m) Energy Efficiency and Renewable Energy Plan
n) Sustainability Plan (including BREEAM Excellent)
o) Measures to ensure future connection to a local energy network
p) Construction apprenticeships paid London Living Wage (29 in total) and support fee of £1,700 per apprentice (£49,300)
q) Local Procurement Strategy (including Camden Local Procurement Code)
r) Employment and Training Plan (including work experience placements, 20% local recruitment target, and engaging with Camden schemes)
s) Operational Management Plan

540. The Heads of Terms secured by the City are mostly in alignment with the above Heads of Terms sought by Camden, however there are inevitably some differences due to the respective Local Plans, context of the parts of the development falling on different sides of the LPAs boundary, and separate assessments of the proposal. As such, some obligations are sought by one authority and not the other.

541. The boroughs will be in consultation with each other both during the drafting of the respective legal agreements and, where appropriate, in the process of discharging relevant obligations to ensure that where any Heads of Terms extend across the borough boundaries or are required by only one borough, the obligations are consistent and enforceable.

542. Consideration may also be given to the boroughs being a party to the other borough's legal agreement to acknowledge that, where relevant, the obligations are enforceable across the whole of the development site.

Monitoring and Administrative Costs

543. 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.

544. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Conclusions

545. 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, local finance considerations, and considering all other material considerations.

546. The application site straddles the City of London and London Borough of Camden. For that reason, duplicate applications have been submitted to both local authorities. Through the course of the application the two local authorities worked together to address the matters raised by internal and external consultees and public representations and conclude on planning recommendations.

547. The application is intended to be considered by the Planning Committee of London Borough of Camden on 11th of July 2024 and as such no resolution has been granted. LB Camden will be determining an identical application which will assess the considerations relevant to the development located within their boundaries and against their policies.

548. The proposed development comprises the change of use of the existing deep level tunnels to a visitor and cultural attraction (Use Class F1 (b) and (c)). The attraction would offer cultural exhibition areas, to curate the history of Kingsway Tunnels, used during and after London war times, by restoring and interpreting their rich history in a historic exhibition space and a flexible gallery space where modern and innovative content would be shaped by indented partnerships. The proposal also involves the demolition and reconstruction of 38-39 Furnival Street and the redevelopment of 40-41 Furnival Street to provide the principal entrance to the cultural space at the ground level and ancillary spaces at the upper levels, including a gift shop, staff accommodation and plant rooms to serve the function of the tunnels. The reconstruction of the site at Furnival Street would involve excavation for additional basement levels under the two buildings and widening of the lift shaft at 38-39 Furnival Street for the provision of the main passenger lifts. A secondary visitor and emergency entrance is proposed at 31-33 High Holborn via Fulwood Place, located in the London Borough of Camden. The creation of a deep level bar is proposed at the western part of the tunnels, in LB Camden, which would be principally accessed via Fulwood Place and would form an independent unit with its own operational hours and staff.

549. The application received 57 letters of support from the public that expressed their strong support for the proposed cultural use and the socio-economic benefits it would bring to the local and London-wide area. Letters of support have been received from Central District Alliance and the Fleet Quarter, identifying the transformative nature of the scheme to an area that very much

needs this change. It is not standard for an application in the City to receive so many letters of support.

550. A total of 24 objections to the scheme have been received from the public raising concerns over the noise and disturbance caused by construction and the increased footfall and traffic at operational stage that would impact the amenity of nearby residential and commercial occupants, the harm to the conservation area and the design of the new building on Furnival Street, impact of the proposed delivery and servicing arrangements on local residents and business, the physical incapacity of Furnival Street to accommodate the proposed development, and daylight and sunlight impacts to the commercial building at 10 Furnival Street, opposite of the application site. The areas of consideration are normally raised by the public when an application involves construction works near residential properties and a land use with the potential to increase activity on site.

551. A total of 12 statutory consultees have responded with no objections raised for the grand permission of the proposed development subject to conditions and informatives being appended.

552. Whilst there would be a loss of 1,229 sqm office floorspace, building at 40-41 Furnival Street, officers conclude that this is necessary for the delivery of the proposed scheme which is considered to fall within the 'exceptional' category of complimentary uses, as identified in supporting text in Local Plan Policy DM1.1, and as such it is acceptable in principle.. The existing offices would be a poor competitor to other buildings in better locations given they are dated and not of high-quality in terms of their accommodation and building design. The scheme delivers 10,341 sqm of high-quality unique cultural use with access provided at the northwest side of the City. The loss of the modest office has been weighed against the exceptional re-use of the adjoining heritage asset, the inherent requirement of 40-41 Furnival Street for access/ancillary space and the wider economic benefits the cultural use would bring to the City as a whole. Officers consider that the proposal would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The cultural space will contribute towards diversifying the City's visitor infrastructure, adding vibrancy and activity for seven days per week and contribute significantly to the achievement of the City Corporation's Destination City ambitions and align with the City Corporation's wider ambitions for a post-Covid City. The loss of office floorspace at 40-41 Furnival Street is considered acceptable on that basis.

553. The proposal makes effective use of an existing unused infrastructure and considers a most interesting way of restoring and reusing them with reference to their rich history which has been left unknown to date. Officers consider this to be a respectful way to bring the tunnels back to life and educate people on

their use at historic times. The application provisions a large heritage space to be developed around the site's historic times with interactive ways of exploring and learning to create stimulating experiences. It is acknowledged that any other use would not be able to focus on the heritage and historic aspect of the site as much as the current proposal does. The provision of a flexible exhibition space adds to the cultural supply in the City and would create opportunities for special exhibitions to take place to attract more diversified population.

554. The cultural use is supported on the basis of the City's wider cultural aspirations and the public benefits of the scheme. Such benefits include engaging with schools by securing free school visits and training programmes, generating employment on the site and through supply chains, tourism and spending between £60m - £85m in the local area each year which would benefit the economy and revitalisation of the local businesses, maximising opportunities for local and inclusive procurements. The proposal gives the opportunity to access and appreciate the interiors of such historically significant infrastructure and commits to partnerships with universities and tech-institutions and co-curation and co-creation programmes to curate the cultural spaces with the help of local communities.

555. The site is located within the Chancery Lane conservation area. The building at 38-39 Furnival Street has been identified as a non-designated heritage asset due to its connection to the historic Kingsway Tunnels and its rarity value. The proposed development involves demolition in a conservation and reconstruction of the primary facade of the No38-39.

556. Paragraph 209 of the NPPF states *"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."* Paragraph 210 of the NPPF continuous to state that *"Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred".* It is considered that the demolition of 38-39 Furnival Street and reconstruction of the brick facade would result in loss of part of the non-designated heritage asset but on balance this would not diminish the overall significance of the heritage asset. Officers have taken into account that the proposed works would improve the accessibility and visibility of this currently unknown heritage asset to a wide public audience without distracting from its historical and rarity value in line with London Plan Policy HC1, Local Plan Policy CS12 and Emerging City Plan 2040 Policy S11. In line with paragraph 210 of the NPPF, a Cultural Implementation Strategy would be secured via Section 106, requiring a Cultural Operator to be secured prior to any demolition works. Officers consider this as a necessary condition to ensure

the partial loss of the non-designated heritage asset would occur only when the operation of the proposed cultural development would be secured.

557. The Greater London Archaeological Advisory Service (GLAAS) have recommended two-stage pre-commencement archaeological conditions requiring a Written Scheme of Investigation (WSI) and a Historic Building Recording to be carried out prior to any demolition works. Subject to conditions the proposal is acceptable in archaeological terms and accords with Local Plan Policy DM12.4 and draft City Plan Policy HE2.

558. The architectural approach is to recreate the existing building portions in terms of massing, height as currently stand at 38-41 Furnival Street. The proposed facade treatment includes a primary frontage of 40-41 Furnival Street expressing the new function of the building, while it reimages the existing brick facade of 38-39 Furnival Street to celebrate the history of the site. The distinctive sense of separate budlings with different characters would refine a level of neighbourly architecture while adding a level of visual interest and character connected to the unique cultural use of the buildings and the subterrane tunnel network. The development is sensitive to townscape contexts at macro and local scales. The proposal would optimise the use of land, whilst significantly improving the buildings' interface with their surroundings. The proposals are in overall general conformity with Local Plan Strategic Policies CS10 (Design), London Plan Policies D3/D8 and emerging City Plan 2040 Strategic Policy S8 (Design).

559. The proposed ground floor layout and design promotes a defined, active base of human scale expression through increased levels of glazing and interaction with the ground floor primary use of the cultural use main entrance making a positive contribution to the street.

560. The proposed cultural use due to its unique experience and capacity would generate trips towards the site with a high number of visitors travelling to the area. The site is within the Central Activities Zone and highly sustainable with very good access to transport infrastructure and able to support active travel. However, there would be some impact to the pedestrian comfort due to a high number of future visitors. An appropriate package of S278 works would be agreed in order to facilitate the development and make the development acceptable in planning terms. Works would include providing a welcoming pedestrian environment while coping with the increased footfall in the local area. Other mitigation measures, conditions and obligations have also been considered to make the application acceptable such as a future agreement of an Events Management Plan with highways matters to be agreed on a case-by-case basis to control servicing, possible queuing, operations, and time restrictions for deliveries. Vehicle movements would also be increased in the area. Around eight deliveries are expected to be generated per day by the site.

Officers have worked closely with the applicant to identify how and when deliveries can be facilitated. The main delivery point has been amended over the course of the application due to the narrowness and the restricted access of the site on Furnivall Street. The main delivery point would be from Holborn away from residential properties and will be restricted in line with local traffic orders and environmental health officer recommendations to protect the amenity of local residents. Matters relating to cycle parking, car parking, taxi drop off, and coach parking have been satisfactorily addressed.

561. The proposed buildings have been designed to ensure the site is accessible for the greatest range of people. Step-free access is secured for the entirety of the development. Visitors would only be able to access the ground level where the principal entrance would be located, at 38-41 Furnival Street, the tunnels exhibition spaces and the first and second levels where provision of a gift shop would be made. The upper levels up to level four and the roof terrace would only be accessible to staff. The staff accommodation area has been designed with accessibility standards and offers end-of trip facilities and accessible changing facilities and toilets. A public Changing Places facility would be provided in the tunnels alongside a mix of toilets across general public accessible areas. Details of the management and operation of the above spaces would be required under conditions and an Access Management Plan in the Section 106 agreement. Subject to further design details and an AMP, 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 of the Local and London Plan.

562. It is noted that the majority of the objections have been around noise, disturbance, impacts to residential amenity and traffic. This report has considered these impacts, including any requisite mitigation which would be secured by conditions.

563. The Environmental Health team were consulted and recommended a series of conditions to control the noise levels generated by the operation of the cultural use, the plant room at roof level and servicing. Negative impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any adverse impacts. The use of the staff rooftop terrace would be restricted outside 8am-8pm to safeguard the amenity of adjoining occupiers. Therefore it is considered the proposed development complies with local plan policies regarding impact on amenity.

564. Negative impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any adverse impacts.

565. The safe and secure decontamination of the site has been secured by conditions for submission of relevant details to the local authority prior to commencement of works.

566. In terms of daylight sunlight impacts, the proposed buildings would not deviate significant from the existing massing. The necessary assessment has been undertaken demonstrate a moderate to hight level of BRE compliance. it is considered that the impact of the proposed development is considered to be acceptable with regards nearby dwellings, in accordance with the requirements of London Plan policy D6, Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040. Considering the site's urban context, acceptable living standards would be maintained.

567. It is important to acknowledge the significant environmental impact associated with the proposed development. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. Local Plan policy dictates that all development is required; to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and "end of life" phases of development; to minimise emissions and contribute to a City-wide reduction in emissions: to incorporate climate change adaption measures and urban greening, and to promote biodiversity and overall wellbeing. Development should also avoid demolition and reduce construction emissions through the reuse of existing buildings and by following principles of the circular economy.

568. The London Tunnels proposal offers a unique visitors attraction which would bring an under-utilised piece of historic infrastructure into public use, whilst retaining 90% (by area) of the existing buildings and structures, including the entire tunnel network bringing with it public and environmental benefits.

569. Demolition of both buildings on Furnival Street is deemed acceptable, justified by the practical constraints of the construction process, the requirements for achieving greater access to the Tunnel network (for visitors and equipment) as well as the improved servicing efficiencies which can achieved through the size/layout of a new build.

570. The change of use of deep level tunnels, designed for emergency shelter and secure telecommunication, to a cultural exhibition and event space offering the potential for immersive audio-visual experiences is technically challenging and requires an extensive amount of building services equipment to accommodate the high visitor numbers targeted/anticipated, and to meet high cooling loads particularly associated with audio-visual equipment.

571. The building operations and maintenance and replacement works over the building's lifespan (primarily attributed to servicing equipment) have a high carbon intensity (emissions rate per m2). Embodied emissions associated with MEP equipment alone are estimated to be 40% of WLC embodied emissions with a further 40% of WLC emissions attributed to operational energy use. A highly efficient cooling system with heat recovery has been designed to manage over-heating within the tunnel network but the amount of waste heat expelled to the atmosphere remains significant without a connection to a local area network or neighbouring site, neither of which are currently proposed.

572. The total quantity of audio-visual equipment has a very significant impact on overall energy use and cooling demand which in turn affect both operational and embodied carbon emissions (due to the increase in quantity of cooling equipment). Therefore, the special exhibitions and events component of the proposal (and the type and frequency thereof) has a significant impact on the sustainability of the development. The impact could be reduced through a responsible Cultural Implementation Strategy and Management Plan.

573. The proposed development offers an increase in urban greening and biodiversity, and an improved surface water run-off rate. Although these contributions are relatively small, they are acceptable in policy terms due to the limited area of the site which sits above ground.

574. The development proposal is currently targeting a BREEAM rating of 'Very Good' which falls short of the City's policy requirement of 'Excellent.' The pre-assessment demonstrated good potential to achieve an Excellent rating. Given this assessment and the wider environmental impact, the development is therefore expected to make best efforts to achieve a minimum rating of 'Excellent'. A condition has been recommended to secure requirements are met.

575. In terms of fire safety, the proposal integrates a series of measures to control fire and keep people in safety until they egress. A fire evacuation strategy and fire-fighters emergency access and fire elimination equipment would be strategically implemented on site. City's District Surveyor has reviewed the submitted Fire Statement and raised no objections. Whilst London Fire Brigade raised questions about how the detailed design of the scheme would be able to

satisfy some of their concerns, it is considered that the exact design and methodologies would be only available post planning and during the Qualitative Design Review (QDR) process. The applicant has committed to consult LFB as a key stakeholder at that stage. An informative has been recommended as a reminder.

576. Therefore overall, it is considered that the proposed cultural use would not prejudice the primary business function of the City; it would contribute to the City's aspirations for evening and weekend economy; it would generate local spend between £60m - £85m each year and create new jobs; promote balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.

577. The proposals are considered to be in accordance with the development plan when taken as whole.

578. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

579. 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.

Appendix A - Background Papers

List if Application Documents:

Application Covering Letter (30/11/2023)

Application Form & Certificates (30/11/2023)

Community Infrastructure Levy Form (18/12/2023)

Site Location Plan 2 (Below Ground & Tunnels Complex) (30/11/2023)

Site Location Plan 3 (Site Boundaries) (15/12/2023)

Site Plan (30/11/2023)

Design and Access Statement (30/11/2023)

Accessibility Assessment (30/11/2023)

Planning Statement (30/11/2023)

Heritage Statement (30/11/2023)

Archaeological Desk Based Assessment (30/11/2023)

Cultural Plan (30/11/2023)

Statement of Community Involvement (30/11/2023)

Socio-Economic Assessment (30/11/2023)

Sunlight & Daylight Assessment (30/11/2023)

Air Quality Assessment (30/11/2023)

BREEAM Pre-Assessment Report (30/11/2023)

Circular Economy Statement (30/11/2023)

Construction Traffic Management Plan (30/11/2023)

Delivery & Servicing Plan (17/05/2024)

Energy Statement & Overheating Assessment (30/11/2023)

Fire Statement (30/11/2023)

Flood Risk Assessment & Outline Drainage Strategy (30/11/2023)

Framework Travel Plan (17/05/2024)

Geotech Basement Impact Assessment (30/11/2023)

Noise and Vibration Impact Assessment (30/11/2023)

Pre-demolition Audit (30/11/2023)

Security Report (30/11/2023)

Structural Report (30/11/2023)

Sustainability Statement (30/11/2023)

Transport Assessment (17/05/2024)

Waste Management Plan (05/05/2024)

Whole Life-Cycle Carbon Assessment (30/11/2023)

Health Impact Assessment (18/12/2023)

Adaptation to Climate Change Report (13/03/2024)

Loss of Office Policy Note (11/04/2024)

Lighting Strategy Report (12/04/2024)

Equality Impact Assessment (03/05/2024)

Flood Risk Evacuation Strategy (15/05/2024)

Supplementary Air Quality Response (06/03/24)

Daylight Sunlight Response 1 (05/03/2024)

Daylight Sunlight Response 2 (26/03/24)

WSP responses to Sustainability queries (22/04/24, 02/05/24 and 13/05/2024)

Cultural Plan responses, Email (14/05/2024)

Fire Statement Response to LFB letter (14/05/24)

Design Supplementary Clarification 01 – Furnival Street (17/05/2024)

Design Supplementary Clarification 02 – Accessibility (17/05/2024)

Design Supplementary Clarification 03 – 39 Furnival Street Fabric Retention (17/05/2024).

3rd party reviews

3rd Party Review of Whole Life Carbon Assessment Report by Civic Engineers (14/03/24)

Internal Consultee Responses

Memo, 29/12/23, Environmental Health Officer

Memo, 24/01/24, District Surveyors Office

Memo, 24/01/24, Lead Local Flood Authority

Memo, 23/02/24, Environmental Resilience Officer

Email, 18/04/24, Cleansing Team

Memo, 11/03/24, Air Quality Officer

Email, 16/05/24, City of London Police

Email, 17/05/24, COL Police - Counter Terrorism

Email, 22/05/24, Environmental Resilience Officer

Representations

Support

29/01/24, Mr Colin Matthews, Online

29/01/24, Mr Philip Nash, Online

29/01/24, Ms Susan Smith, Online

31/01/24, Mrs Robyn Brook, Online

31/01/24, Mr James Loxton, Online

01/02/24, Mr KENNETH GOLBY, Online

01/02/24, Mr George Harris, Online

01/02/24, Mr Max Tobias, Online

01/02/24, Mr peter conniff, Online

02/02/24, Mr William Morris, Online

06/02/24, Mr Stuart Perl, Online

14/02/24, Mr Andrew Raca, Online

18/02/24, Mr Andrew Raca, Online

20/02/24, Ms Wendy Lyons, Online

20/02/24, Mr Charles Parry, Online

20/02/24, Mr Charles Parry, Online

20/02/24, Miss Chelsea Cooper, Online

20/02/24, Mr Thomas Seabourne, Online

23/02/24, Miss Angela Dunning , Online

26/02/24, Mrs Sue Macdiarmid, Online

26/02/24, Mr Graham Wingham, Online

26/02/24, Ms Angela Epps, Online

26/02/24, Ms Caroline Gallagher , Online

27/02/24, Mr Neil Emberson, Online

27/02/24, Mr DEREK OWEN, Online

27/02/24, Mr Patrick Ralph, Online

27/02/24, Mrs Sandra Murphy, Online

27/02/24, Dr GABRIEL GOLDMAN, Online

27/02/24, Mr PAUL SCOTT, Online

27/02/24, Mr Jp Ralph, Online

27/02/24, Mr Stephen Luderman, Online

27/02/24, Justin Manley-Cooper, Online

27/02/24, Nick Finegold, Online

28/02/24, Mr Adam Fayed, Online

28/02/24, Mr Gregory Jones KC, Online

28/02/24, Mr David Brown, Online

28/02/24, Alex Hayes-Griffin, Online

28/02/24, Mr chris sullivan, Online

28/02/24, Mr Daniel van Vuuren, Online

28/02/24, Mr Luis Esguevillas, Online

28/02/24, Mr win man, Online

29/02/24, Mr David EH Yeoh, Online

29/02/24, Mr Guy Brook, Online

29/02/24, Miss Heidi Bryant, Online

29/02/24, Ms Helen McDowell, Online

01/03/24, Mr Michael Brown, Online

01/03/24, Dr Geoff Ferreira, Online

06/03/24, Mr Adam Pollock, Online

14/03/24, Mr Lawrence Yew, Online

14/03/24, Mr Maggie Lai, Online

14/03/24, Dr Lai Meng Looi, Online

17/03/24, Mr Alistair Sommerlad, Online

11/04/24, Ms Maria Nieves Garcia Somoza, Online

02/05/24, Mr James Hacking, Online

21/05/24, Central District Alliance

23/05/24, Fleet Street Quarter

Objections

27/12/23, Mrs G Birri, Email, Objection

28/12/23, Ms Lidia Zazzera, Online

30/12/23, Lord John Krebs, Online

03/01/24, Leyi Wang, Email

04/01/24, Mrs Nina Keay, Online

04/01/24, Lisa Zazzera, Email

08/01/24, Walter Scott, Email

08/01/24, Mr James Keay, Online

08/01/24, Mr Brian Cotsen, Online

08/01/24, Brian Cotsen, Email

09/01/24, LEYI WANG, Online

09/01/24, Liz Speirs, Email,

10/01/24, Miss Meihan Dong, Online

10/01/24, Chloe Nash, Email

11/01/24, C Murphy, Online

11/01/24, Anonymous, Email

13/01/24, Mr Jack Watkins , Online

14/01/24, Professor Susan V. Scott, Email

30/01/24, Furnival Management Limited, Email

04/02/24, Miss Lisa Dickenson, Online

16/02/24 - 16:44, Chancery Exchange, Email

20/04/24, Mr & Mrs Birri, Email

27/04/24, Furnival Management Limited, Email

13/05/24, Coralie Murphy, Online

Neutral

29/01/24 - 15:15, Mr Oscar Li, Online

23/03/24 - 15:39, Mr Stephan Fels, Online

24/04/24 - 12:47, Mr Andrew Green, Online

External consultees

02/01/24, Historic England

04/01/24, Historic England (GLAAS)

09/01/24, Transport For London (Infrastructure Protection)

24/01/24, Westminster City Council

29/02/24, Thames Water

07/03/24, Conservation Area Advisory Committee (CAAC)

13/03/24, Environment Agency

19/04/24, Transport For London (Spatial Planning)

22/04/24, London Fire Brigade

Appendix B

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Ensure security from crime/terrorism

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

CS4 Seek planning contributions

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

CS10 Promote high quality environment

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

CS11 Encourage art, heritage and culture

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

CS12 Conserve or enhance heritage assets

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

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

CS16 Improving transport and travel

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

CS17 Minimising and managing waste

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

CS18 Minimise flood risk

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

CS19 Improve open space and biodiversity

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

CS20 Improve retail facilities

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

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Maximise community facilities

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

DM1.1 Protection of office accommodation

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

- jeopardising the future assembly and delivery of large office development sites;
- removing existing stock for which there is demand in the office market or long term viable need;
- introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;

b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;

c) 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:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;

b) reasonable gas and water supply considering the need to conserve natural resources;

c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.2 Security measures

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

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

b) measures to be integrated with those of adjacent buildings and the public realm;

c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

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

a) conducting a full risk assessment;

b) keeping access points to the development to a minimum;

c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;

d) ensuring early consultation with the City of London Police on risk mitigation measures;

e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;

b) restricting motor vehicle access, where required;

c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;

d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;

b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

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

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

c) appropriate, high quality and durable materials are used;

d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;

i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;

l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

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

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;

b) adversely affect rooflines or roof profiles;

c) result in the loss of historic or locally distinctive roof forms, features or coverings;

d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

a) the predominant use of the space, surrounding buildings and adjacent spaces;

b) connections between spaces and the provision of pleasant walking routes;

c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;

d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;

e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;

f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;

g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;

i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;

j) the use of high quality street furniture to enhance and delineate the public realm;

k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM11.1 Protection of Visitor, Arts and Cultural Facilities

1) To resist the loss of existing visitor, arts and cultural facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or

b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or

c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2) Proposals resulting in the loss of visitor, arts and cultural 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 floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.2 Public Art

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

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;

b) ensuring that financial provision is made for the future maintenance of new public art;

c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;

b) an energy statement in line with London Plan requirements;

c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land and water quality

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

DM16.1 Transport impacts of development

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

a) road dangers;

b) pedestrian environment and movement;

c) cycling infrastructure provision;

d) public transport;

e) the street network.

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

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;

b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

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

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

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be

provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

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

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

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

DM17.1 Provision for waste

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

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

DM17.2 Designing out construction waste

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

a) reuse of existing structures;

b) building design which minimises wastage and makes use of recycled materials;

c) recycling of deconstruction waste for reuse on site where feasible;

d) transport of waste and construction materials by rail or river wherever practicable;

e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management .

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:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

b) the benefits of the development outweigh the flood risk to future occupants;

c) 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:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and

b) 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.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;

b) provide a high quality environment;

c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;

d) have regard to biodiversity and the creation of green corridors;

e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

a) green roofs and walls, soft landscaping and trees;

b) features for wildlife, such as nesting boxes and beehives;

c) a planting mix which encourages biodiversity;

d) planting which will be resilient to a range of climate conditions;

e) maintenance of habitats within Sites of Importance for Nature Conservation.

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.

London Plan Policies

- Policy GG1: Building Strong and Inclusive Communities
- Policy GG2 :Making the Best Use of Land
- Policy GG3: Creating a Healthy City
- Policy GG5: Growing a Good Economy
- Policy GG6: Increasing Efficiency and Resilience
- Policy SD4: The Central Activities Zone (CAZ)
- Policy SD5: Offices, and Other Strategic Functions and Residential Development in the CAZ
- Policy D1: London's Form, Character and Capacity for Growth
- Policy D2: Infrastructure Requirements for Sustainable Densities
- Policy D3: Optimising Site Capacity through the Design-led approach
- Policy D4: Delivering Good Design
- Policy D5: Inclusive Design
- Policy D8: Public Realm
- 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 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 G5: Urban Greening
- Policy G6: Biodiversity and Access to Nature
- Policy G7: Trees and Woodlands
- Policy SI1: Improving Air Quality
- Policy SI2: Minimising Greenhouse Gas Emissions
- Policy SI3: Energy Infrastructure
- Policy SI4: Managing Heat Risk
- Policy SI5: Water Infrastructure
- Policy SI7: Reducing Waste and Supporting the Circular Economy
- Policy SI8: Waste Capacity and Net Waste Self-sufficiency
- Policy SI13: Sustainable Drainage
- Policy T1: Strategic Approach to Transport
- Policy T2: Healthy Streets
- Policy T3: Transport Capacity, Connectivity and Safeguarding
- Policy T4: Assessing and Mitigating Transport Impacts
- Policy T5: Cycling
- Policy T6: Car Parking
- Policy T7: Deliveries, Servicing and Construction
- Policy T9: Funding Transport Infrastructure through Planning

Relevant GLA Supplementary Planning Guidance (SPG):

- 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);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018) .

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Air Quality SPD (July 2017);
- Archaeology and Development Guidance SPD (July 2017);
- City of London Lighting SPD (October 2023);
- City Transport Strategy (May 2019);
- City Waste Strategy 2013-2020 (January 2014);
- Protected Views SPD (January 2012);
- Preventing Suicides in High Rise Buildings and Structures Planning Advice Note (April 2022)
- Planning Obligations SPD (July 2014);
- Open Space Strategy (2016);
- Office Use SPD (2015);
- City Public Realm (2016);
- Cultural Strategy 2018 – 2022 (2018);
- Chancery Lane Conservation Area, Character Summary & Management Strategy SPD (February 2016);
- Fleet Street Area, Healthy Streets Plan (2023).

Relevant Draft City Plan 2040 Policies

- **Strategic Policy S1: Healthy and Inclusive City**
- Policy HL1: Inclusive Buildings and Spaces
- Policy HL2: Air Quality
- Policy HL3: Noise
- Policy HL4: Contaminated Land and Water Quality
- Policy HL6: Public toilets
- Policy HL9: Health Impact Assessments
- **Strategic Policy S2: Safe and Secure City**
- Policy SA1: Publicly Accessible Locations
- Policy SA2: Dispersal Routes
- Policy SA3: Designing in Security
- **Strategic Policy S3: Housing**
- Policy HS3: Residential Environment
- **Strategic Policy S4: Offices**
- Policy OF1: Office Development
- Policy OF2: Protection of Existing Office Floorspace
- **Strategic Policy S5: Retail**
- Policy RE2: Active frontages
- **Strategic Policy S6: Culture and Visitors**
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5: Evening and Nigh-Time Economy
- Policy CV6: Public Art
- **Strategic Policy S7: Infrastructure and Utilities**
- Policy IN1: Infrastructure Provision and Connection
- Policy IN2: Infrastructure Capacity
- Policy IN3: Pipe Subways

- **Strategic Policy S8: Design**
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and viewing galleries
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- **Strategic Policy S9: Transport and Servicing**
- Policy VT1: The Impacts of Development on Transport
- Policy VT2: Freight and Servicing
- Policy VT3: Vehicle Parking
- **Strategic Policy S10: Active Travel and Healthy Streets**
- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel Including Cycling
- Policy AT3: Cycle Parking
- **Strategic Policy S11: Historic Environment**
- Policy HE1: Managing Change to the Historic Environment
- Policy HE2: Ancient Monuments and Archaeology
- **Strategic Policy S13: Protected Views**
- **Strategic Policy S14: Open spaces and Green Infrastructure**
- Policy OS1: Protection and Provision of Open Spaces
- Policy OS2: Urban greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5: Trees
- **Strategic Policy S15: Climate Resilience and Flood Risk**
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR2: Flood Risk

- Policy CR3: Sustainable Drainage Systems (SuDS)
- **Strategic Policy S16: Circular Economy and Waste**
- Policy CE1: Sustainable Waste Facilities and Transport
- **Strategic Policy S26: Planning Contributions**

SCHEDULE

APPLICATION: **23/01322/FULMAJ**

38-41 Furnival Street & 31-33 High Holborn

Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary). Re-consultation: Due to amended details.

CONDITIONS

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
   REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

Use Class

2. The entirety of the site, save for the bar, herby approved shall be used for Visitor and Cultural Attraction (Use Class F1 (b)(c)), including any ancillary spaces, and for no other purpose (including any other purpose within Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
   REASON: To ensure City of London's contribution to London's world-class cultural offer in accordance with the following policy of the draft City Plan 2040: S6.

Floor Areas

3. The development shall provide (all figures GIA and excluding plant):

- 10,341sq.m Visitor and Cultural Attraction (Class F1(b)(c));
- 284 sq.m Bar Use (Sui Generis);
REASON: To ensure the development is carried out in accordance with the approved plans.

Operation hours

4. The permanent Visitor and Cultural Attraction (Use Class F1(b)(c)) hereby permitted shall not be open to customers between the hours of 8pm on one day and 10am on the following day.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Design and Heritage

5. Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
a) particulars and samples of the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy;
b) construction of 1:1 sample material and facade panels of agreed sections of the facades;
c) detailed drawings of a scale no less than 1:20, in plan, section and elevation, of agreed typical bays;
d) details of all new ground floor elevations including all entrances, service doors, crane, soffits, and information boards;
e) Details of new entrance;
f) details of all new flanking elevations;
g) irrespective of approved drawings, details of plant screening including the 5th elevation;
h) details of terrace including all elevations, hard and soft landscaping, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required
i) details of railings, balustrades, ramps, screens, handrails etc, bounding or within the site;
j) 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;
k) details of the integration of M&E and building services into the external envelope;

l) details of external ducts, vents, louvres and extracts;
m) details of signage for all aspects of the building;
n) Details of access to the roof for cleaning and maintenance, including details of mansafe equipment.
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 SE1, DE2, DE6 and HE1 of the Draft City Plan 2036.

6. Prior to the commencement of relevant works, a method statement shall be submitted to and approved by the local planning authority setting out the methodology for the dismantlement, storing and reconstructing the brick façade of No.38-39 Furnival Street including the concrete grill. The development shall be carried out in accordance with the approved details.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM12.2, DM12.3.

Archaeology

7. No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake they're great works.
If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site would have archaeological interest a state 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI with cell include:
A. the statement off significance and the research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. where appropriate, details of a programme for delivering related positive public benefits
C. the programme for post investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

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

a. the programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

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

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

Public Access and Inclusivity

8. Before any construction work hereby permitted are begun, details of the proposed lifts shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.
   REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

9. Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority. Proposed finished floor levels at basement and threshold ground floor (threshold review) levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.
   REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the

development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

10. Before any construction work hereby permitted are begun, a scheme indicating the provision to be made for disabled people to gain access to all areas shall be submitted to and approved in writing by the Local Planning Authority. The agreed scheme shall be implemented in accordance with the approved details before the development hereby permitted is brought into use.
    REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

11. The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway.
    REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

12. Prior to the occupation of the building, the applicant is required to submit to the Local Planning Authority for approval of a wayfinding strategy. The developer is to consider the implementation or removal of legible London signage within the site and surrounding locations including transport nodes and tube stations. The applicant shall have agreed terms and extent of the works with TfL, prior to submission.
    REASON: In the interests of visual amenity and satisfactory pedestrian circulation of the site, in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

13. Prior to the occupation of the building, a Signage and Wayfinding Strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural exhibition areas and any other relevant facilities shall be submitted to and approved in writing by the Local Planning Authority. The strategy should include details of navigation on the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of ‘two senses’.
    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.

Construction

14. 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.

15. Construction works shall not begin until a Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority, and in consultation with TfL. The CLP aims to manage all freight vehicle movements to and from the site during construction of the development. The plan must be in line with TfL's Construction Logistic Guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The development shall not be carried out otherwise than in accordance with the approved CLP. Any amendments thereto must 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.

Cycle Parking

16. Details of the all long stay cycle parking and facilities linked to the cycle stores shall be submitted to and approved in writing by the Local Planning Authority, prior to the occupation of the building hereby permitted. Details shall include permanently installed pedal cycle racks sufficient to accommodate a minimum of 14 spaces including adaptable spaces with a range of cycle space types split across the two bike stores. The cycle parking spaces shall be designed in line with London Cycle Design Standards and shall be implemented prior to occupation of the building. All doors on the access to the parking area shall be

automated, push button or pressure pad operated. The cycle parking spaces and facilities shall be thereafter operated in accordance with the approved details for the life of the building.
REASON: To ensure provision is made for cycle parking and that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policies of the Local Plan: DM16.1, DM 16.3, and emerging policy AT3 of the Draft City Plan 2040.

17. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DMI0.8, London Plan policy TS cycling, emerging policy AT3 of the Draft City Plan 2040.

18. Details of mobility scooter storage within the ground floor bike store, to include fire-guarding as required, and accessible charging points at a minimum height of 400mm above floor level.
REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8.

Section 153

19. No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety and to comply with section 153 of the Highways Act 1980.

Refuse/ Recycling

20. The refuse/ recycling collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

21. On a daily basis, and outside of the opening hours for the exhibition spaces and ancillary areas hereby approved, the on-site FM team will transfer the bins from the main waste storage areas to a waste presentation area on Furnival Street. The waste management contractor appointed by the on-site FM team will collect the bins from the waste presentation area.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

TfL (Infrastructure Protection)

22. The development hereby permitted shall not commence until the following documents, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority, which:

a) provide details on the use of scaffold/tall plant i.e cranes and lifting equipment;
b) accommodate ground movement impact on all identified LU assets arising from the development construction. A Ground Movement Assessment (GMA) should be submitted to TfL IP for approval;
c) mitigate the effects of noise and vibration arising from the adjoining operations within the railway structures and tunnels;
d) no works to commence near or on the boundary with London Underground assets until any party wall agreements required with TfL Engineering, TfL Property or TfL Legal have been agreed and signed by all parties. As shown on Title No. LN170205, London Underground own the Fulwood Place Vent Shaft and other assets located at 31-33 High Holborn;
e) demonstrate that the Fulwood Place Vent Shaft and its ancillary equipment/facilities will not be impacted by the development.
f) demonstrate that no ventilation or exhaust gases are discharged into TfL / LUL assets or airspace.
g) demonstrate that TfL access to the vent shaft from Fulwood Place is not impeded or altered.
REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

Air Quality

23. Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.
REASON: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in

accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

24. 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.

25. 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.

26. An Indoor Air Quality report should be submitted and approved in writing by the Local Planning Authority. The report should detail the air pollution environment within the deep level tunnels, and the requirement(s) to ensure suitable air quality is maintained for the proposed usage.
REASON: In order to ensure the proposed development reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policy SI1.

Environmental Health

27. Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due

consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences . The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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

site development is safe, suitable for its intended use, and would not be considered under Part 2A of the Environmental Protection Act 1990.
REASON: To ensure that the development is safe and suitable for its intended use for the future users of the land, neighbouring land, and that risks to controlled waters, property and ecological systems are minimised, in accordance with the Local Plan DM15.8. These details are required prior to occupation in order that appropriate evidence of the remedial works is agreed and accepted by the Local Planning Authority prior to any potential exposure of occupiers or harm to the environment from land contamination.

29. Should unexpected contamination be identified during development hereby approved, the Local Planning Authority must be notified in writing within five working days. An investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

30. No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

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

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

32. 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.

33. The roof terrace on level 4 hereby permitted shall not be used or accessed between the hours of 20:00 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.

34. No amplified or other music shall be played on the roof terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

35. There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

36. (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

37. 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.

38. 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.

39. 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.

40. Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

41. 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.

42. 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.

Lighting Strategy

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

a. all luminaires both decorative, functional or ambient (including associated infrastructure);
b. lighting layouts;
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 relation spaces and terraces 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. the impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and Lighting Strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE8 of the Draft City Plan 2040.

Thames Water

44. 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) 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.

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.

45. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.
REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

46. 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) 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.
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.

Carbon and Energy

47. Prior to the commencement of the development, (excluding demolition), an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment must be based on a highest use scenario, full fit-out, (including fixtures and equipment, specifically audio-visual equipment) and “best guess” frequency of operation (special exhibitions and events). The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior

to demolition (as specified above) and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

48. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority . The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

49. The development shall be designed to allow for connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site. This is in addition to the requirement to find a beneficial use for the waste heat produced through the development's operations.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

50. Prior to the commencement of development, excluding demolition, an updated Energy Assessment confirming the detailed design stage highest use scenario full fit-out, (including fixtures and equipment, specifically audio-visual equipment) and "best guess" frequency of operation (special exhibitions and events) is to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the development.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2. These details are required prior to

demolition and construction work commencing in order to be able to account for the carbon emissions associated with the proposed fit-out.

Circular Economy

51. (a) Prior to demolition of the development an updated pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan and details of the proposed demountable partition design, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements and of the interventions in order to distinguish the historic from the new fabric. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

52. No later than 3 months after completion of the building, a post-construction Circular Economy Statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

Greening and Biodiversity

53. Within 6 months of completion of the development, details of the final landscaping design and an Ecological Management Plan, to include plant and habitat species (with information on coverage and biodiversity improvement), scaled drawings identifying measures and maintenance strategies, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained in accordance with the submission documents to ensure the approved standard is preserved for the lifetime of the development.
REASON: To support 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 Draft City Plan: S14, OS2 whilst ensuring these benefits are maintained in the long term.

Water Management

54. 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, blue roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.5 l/s from each outfall and from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 25m3;
(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.
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.

Climate Resilience

55. Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

56. Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

BREEAM

57. A post construction BREEAM assessment 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 carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

Security

58. Prior to occupation, security measures must be provided within the development, having being developed in consultation with City Police, such as CCTV, lighting, entrances and improvements to secure access.
REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.

Suicide Prevention Measures

59. Prior to the occupation of the roof terrace, details of suicide prevention measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. All development pursuant to this permission shall be carried out in accordance with the approved details and maintained for the life of the building.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure adequate safety measures are in place in accordance with Local Plan Policy CS3 and emerging draft City Plan 2036 Policy DE2 and DE5.

Telecommunications equipment

60. Unless otherwise approved by the LPA 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.

Approved Plans

61. 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:

Site Location Plan 01820-WEA-XX-ST-PD-A-0003 Rev 00

Demolition: PD-A-0150 Rev 00, PD-A-0151 Rev 00, PD-A-0152 Rev 01, PD-A-0349 Rev 00, PD-A-0350 Rev 00, PD-A-0351 Rev 00, PD-A-0352 Rev 00, and PD-A-0353 Rev 00.

Proposed Furnival Street:
PROPOSED B3 PLAN – 01-B3-PD-A-1097 Rev 00;
PROPOSED B2 PLAN – 01-B2-PD-A-1098 Rev 00;
PROPOSED B1 PLAN – 01-B1-PD-A-1099 Rev 02;
PROPOSED L00 PLAN – 01-00-PD-A-1100 Rev 04;
PROPOSED L01 PLAN – 01-01-PD-A-1101 Rev 00;
PROPOSED L02 PLAN – 01-02-PD-A-1102 Rev 01;
PROPOSED L03 PLAN – 01-03-PD-A-1103 Rev 00;
PROPOSED L04 PLAN – 01-04-PD-A-1104 Rev 00;
PROPOSED L05 PLAN – 01-05-PD-A-1105 Rev 00;
PROPOSED ROOF PLAN – 01-RF-PD-A-1106 Rev 00;
OVERALL PROPOSED WEST ELEVATION – 01-W-PD-A-2100 Rev 01;
PROPOSED WEST ELEVATION – 01-W-PD-A-2104 Rev 01;
PROPOSED NORTH ELEVATION – 01-N-PD-A-2101 Rev 00;
PROPOSED SOUTH ELEVATION – 01-S-PD-A-2102 Rev 01;
PROPOSED EAST ELEVATION – 01-E-PD-A-2103 Rev 01;
WEST FAÇADE SETTING OUT – 01-ZZ-PD-A-3050 Rev 00;
GA BUILDING SECTION AA – 01-AA-PD-A-3100 Rev 01;
GA BUILDING SECTION BB – 01-BB-PD-A-3101 Rev 01;
GA BUILDING SECTION CC – 01-CC-PD-A-3102 Rev 01;
GA SHAFT SECTION AA – 01-AA-PD-A-3103 Rev 01;
GA SHAFT SECTION CC – 01-CC-PD-A-3105 Rev 01;
CENTRAL LIFT DETAIL – 01-ZZ-A-4150 Rev 00;
STAFF BIKE STORE (Ground floor plan) – 01-00-A-4151 Rev 02;
FAÇADE TYPE 01 - GLASS BRICK LOWER – 01-ZZ-PD-A-5101 Rev 01;
FAÇADE TYPE 01B - GLASS BRICK – UPPER – 01-ZZ-PD-A-5107 Rev 01;
FAÇADE TYPE 02 - REINSTATED BRICK – 01-ZZ-PD-A-5102 Rev 01;
FAÇADE TYPE 03 - GROUND FLOOR EXIT – 01-ZZ-PD-A-5103 Rev 01;
FACADE TYPE 03B - GROUND FLOOR ENTRANCE – 01-ZZ-PD-A-5108 Rev01;
FAÇADE TYPE 04 - L04 TERRACE – 01-ZZ-PD-A-5104 Rev 01;
FAÇADE TYPE 05 - PLANT SCREEN – 01-ZZ-PD-A-5105 Rev 01;
FAÇADE TYPE 06 - PARTY WALL – 01-ZZ-PD-A-5106 Rev 00;
Plan showing extend of Section 278 works – 70106185-TP-SK-1 P02;

Proposed Tunnels GAs:
PROPOSED LMINUS 01 – PLAN 03-M1-PD-A-0099 Rev 00;
PROPOSED LPLUS 01 PLAN – 03-01-PD-A-1001 Rev 00;
PROPOSED LPLUS 02 PLAN – 03-02-PD-A-1002 Rev 00;

PROPOSED LPLUS 03 PLAN – 03-03-PD-A-1003 Rev 00;
PROPOSED SECTOR A PLAN – 03-ZZ-PD-A-1010 Rev 01;
PROPOSED SECTOR B PLAN – 03-ZZ-PD-A-1011 Rev 01;
PROPOSED SECTOR C & D PLAN – 03-ZZ-PD-A-1012 Rev 01;
PROPOSED SECTOR B PLAN – 03-ZZ-PD-A-1013 Rev 01;
PROPOSED - CROSS SECTIONS – 03-ZZ-PD-A-3300 Rev 00.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

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

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

- a full pre application advice service has been offered;
  where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

2. This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.

3. 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.

4. Service providers are required to have regard to obligations under the Equality Act 2010. In the exercise of their functions, due regard needs to be given to:
    - elimination of discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
    - advancement of equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
    - fostering good relations between persons who share a relevant protected characteristic and persons who do not share it

    The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

    Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

5. 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.

6. 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)

7. 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.

8. Thames Water

   Waste –
   "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

   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.

9. 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.

10. 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.

11. WilkinsonEyre Architects should be retained for the detailed construction stage of the project.

12. This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.

13. Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.

14. The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

15. The landowners, managing operators and tenants are required to adhere to the actions of the Considerate Lighting Charter as set in the City of London Appendix A of the City of London Lighting Supplementary Planning Document 17/11/2022

16. The Crime Prevention Design Advisor for the City of London Police and the Counter-Terrorism Security Advisor should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.

17. The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The London Fire Brigade should form a key stakeholder at detailed design stage including Qualitative Design Review (QDR) process, fire precautions and certification stages.

Archaeology

18. The Written Scheme of Investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

The 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.
Evaluation: An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extend, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches.

Historic Building Recording: Historic building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published. You can find more information on archaeology and planning in Greater London on GLAAS website.

19. The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.

Addendum report to Committee Report: Application No. 23/01322/FULMAJ	
Committee: Planning Application Sub-Committee	**Date:** 11 June 2024
Subject: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary). Re-consultation: Due to amended details (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).	**Public**

1. Changes are proposed to paragraph 248 of the report to include Policy DM 22.2 (Provision of Public Toilets):

<u>Sanitary Facilities</u>

248. It is confirmed that unisex accessible toilets will be provided on all floors, with a range of handed units across the development. Separate male and female, as well as gender neutral cubicles, ambulant disabled cubicles, baby changing facilities, and a Changing Places facility are provided across the development. Public access to the facilities located within the City would be impeded due to the levels of security control for all visitors entering the site and the necessity to keep the movement flow constant to avoid external queues. This would need to be explored further in line with Policy DM 22.2. Further details of the toilet facilities layouts and access including the feasibility of membership of the City's Community Toilet Scheme would be secured through S106 obligation under the AMP.

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