Committee:	**Date:**
Planning and Transportation	29 January 2019
Subject: Former Richard Cloudesley School Golden Lane Estate London EC1Y 0TZ Arboricultural Impact Assessment, prepared by Southern Ecological Solutions, dated July 2017; NBS Specification for Hard and Soft Landscape Works; Golden Lane Confirmation Survey (dwg no. 18020-001); Typical Details Tree Protection (dwg no. COL-BDL-L1-ZZ-DR-L0301); Typical Detail: Tree in Hard Landscape (dwg no. COL-BDL L1-ZZ-DR-L0302); Typical Detail: Tree in Soft Landscape (1) (dwg no. COL-BDL L1-ZZ-DR-L0303); Typical Detail: Tree in Soft Landscape (2) (dwg no. COL-BDL L1-ZZ-DR-L0304); Typical Detail: Tree in Planter (S2) (dwg no. COL-BDL L1-ZZ-DR-L0305); Proposed Utility Services Corridor (dwg no. 37845-C-UT-0006 Rev P3); School Hall Foundations General Arrangement (dwg no. 37845-PBA-03-F1-DR-S-3099 Rev P2; Hard Landscape Plan (dwg no. COL-BDL-L1-ZZ-DR-L-0001 Rev 06); Detailed Levels Plan (dwg no. COL-BDL-L1-ZZ-DR-L-0002 Rev 05); Soft Landscape Layout Plan (dwg no. COL-BDL-L1-ZZ-DR-L-0003 Rev 04); Tree Retention and Removal Plan (dwg no. COL-BDL-L1-ZZ-DR-L-0005 Rev 01); School Hall Ground Floor General Arrangement (dwg no. COL-PBA-B2-00-DR-S-3100 Rev T04); School Hall Substructure Sections and Details (dwg no. COL-PBA-B2-ZZ-DR-S-3301 Rev T03; and Proposed Drainage and Sub-Structure Layout (dwg no. COL-PBA-ZZ-XX-DR-C-3100 Rev T04) pursuant to condition 5 of planning permission dated 19th July 2018 (planning reference 17/00770/FULL).	**Public**
Ward: Cripplegate	**For Decision**
Registered No: 18/01141/MDC	**Registered on:** 26 October 2018
Conservation Area:	**Listed Building:** NO

Summary

The Committee called in for their determination condition 5 of the planning permission for redevelopment of the former Richard Cloudesley School site, which relates to the management and protection of trees on the site. It is proposed that on the western boundary one tree (a silver birch) is being

retained and four other trees are being removed and replaced by three 7m silver birch trees. All the affected trees are located within the London Borough of Islington and therefore regard should be had to their policies (in addition to the City's own Local Plan policies)

32 representations were received in respect of the discharge of this condition.

The principle issues in this case are:

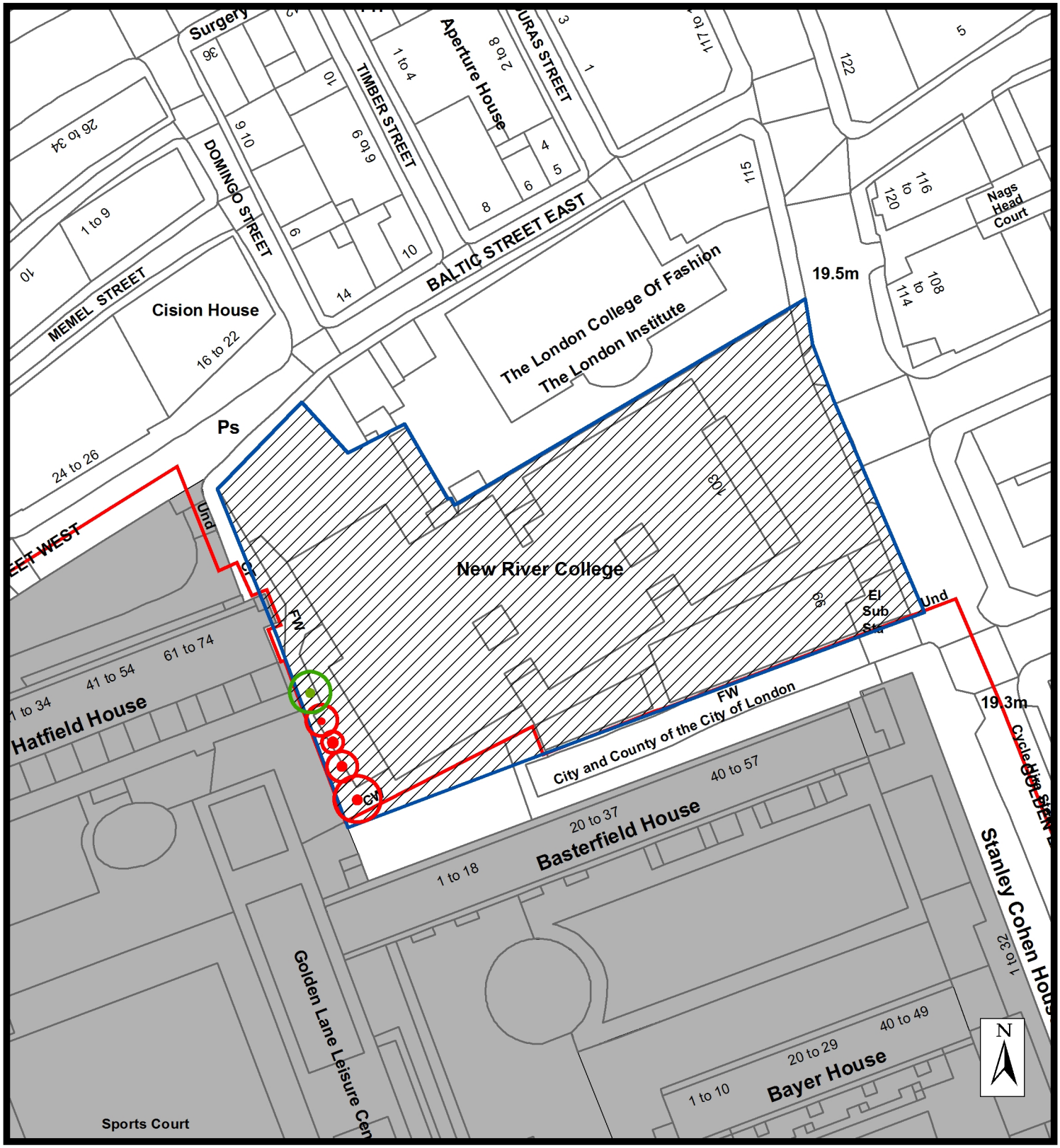
- The ecological value of the trees.
- The condition of the trees.
- Other construction options which would allow the trees to be retained.
- The acceptability of the replacement trees.
- The acceptability of the tree protection measures for the retained trees.

The trees are of limited ecological value and are category C trees due to their low quality. To safeguard them requires significant amendments and delay to the scheme, which is not warranted in these circumstances. The proposed replacement trees and associated tree pits and the measures proposed to safeguard the remaining tree are satisfactory. LBI's Officers are satisfied with the proposals. It is therefore recommended that the condition is discharged.

Recommendation

That the Committee resolves to discharge the condition, and agree that trees T1, T2, T3 and T4 may be removed subject to compliance with the details set out in Condition 5 and the application regarding replanting.

Site Location Plan



ADDRESS:
Former Richard Cloudesley School, Golden Lane Estate

CASE No.
18/01141/MDC

- CITY BOUNDARY
- SITE LOCATION
- LISTED BUILDINGS
- CONSERVATION AREA BOUNDARY
- TREE TO BE RETAINED
- TREES TO BE REMOVED

CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT

Main Report

Site Location and Current Buildings

1. The 0.4 hectare site is currently occupied by predominantly single storey buildings comprising the former Richard Cloudesley School, garages, the City of London Community Education Centre and a sub-station. The majority of the site falls within the London Borough of Islington (LBI) and a small part of the site falls within the City of London (CoL).

2. The boundary between the CoL and LBI is shown on the attached site plan. It can be noted that a very small element of the site is within the City, which includes a small part of the school hall and the southern boundary wall. The trees, subject to the condition, are all located within the LBI.

Application details

3. The Local Planning Authorities issued identical decisions on 19th July 2018.

4. The planning permissions for 'Demolition of the former Richard Cloudesley School, City of London Community Education Centre, garages and substation; erection of a 3 storey building with rooftop play area (Class D1) (2300.5sq.m GEA) and a single storey school sports hall (Class D1) (431sq.m GEA) to provide a two-form entry primary school; erection of a 14 storey (plus basement) building to provide 66 social rented units (Class C3) (6135sq.m GEA), and affordable workspace (Class B1a) (244sq.m GEA), landscaping and associated works' issued by CoL and LBI on 19th July 2018 are identical, and include the same conditions. The permission granted by the City only has effect insofar as it relates to land in the City. Condition 5 relates to the management and protection of trees on the site in LBI. However, the applicant has requested that the condition be discharged by the CoL (as the permissions duplicated each other) and this is considered to be the appropriate approach.

5. Condition 5 states:

   Unless otherwise agreed in writing by the Local Planning Authority none of the existing trees on the boundary with the neighbouring allotments shall be removed or pruned. Prior to commencement (excluding demolition) details of the protection of the trees including the roots shall be submitted to and approved in writing by the Local Planning Authority. The approved protection shall be installed in accordance with the approved details and shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any tree protection area in

accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the Local Planning Authority. Trees which die or become in the opinion of the Local Planning Authority seriously damaged or defective within 3 years of completion of the development shall be replaced with 4m Birch trees or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In order to protect the trees in accordance with City of London Local Plan policies DM10.4 and DM19.2 and Islington Local Plan policy DM6.5.

6. Details have been submitted to discharge this condition. It has been identified that in order to facilitate the construction of the consented school hall one tree can be retained (tree T5) but trees T1 (Silver birch), T2 (Cherry tree), T3 (Buddleja) and T4 (Silver birch), which are located on the western boundary would need to be removed. A justification for their removal, details of replacement trees and details of the tree protection measures for the retained tree have been submitted to discharge this condition.

Consultations

7. The views of other CoL departments and LBI's Arboricultural Officer have been taken into account in considering the details.

8. A total of 32 representations have been received. The issues raised are as follows:

- The loss of trees and mature planting at the site boundary with the community allotments is unnecessary and will severely affect amenity and outlook as well as biodiversity.
- The applicant has made no attempt to mitigate the effect of the proposed site operations on the tree roots.
- There is no new Arboriculturalist's report. [A further Arboricultural Method Statement has been submitted.]
- The applicant has not consulted adequately with residents.
- Bat activity has been seen and recorded in the area.
- Loss of trees during the demolition and construction period will reduce protection from noise and dust. [The applicant advises that no reliance has been placed upon these trees as a means of mitigation.]
- The school hall could be located further from the trees to enable them to be retained and this hasn't been investigated.
- Greenery should be encouraged.
- Air pollution.

- The trees provide shade.
- The scheme involves the planting of new immature trees at some time over the building period. It does not make sense to destroy trees that are thriving.
- Decision to remove the trees is contrary to the Mayor's commitment to planting 1,000,000 trees in London.
- There seems to be a u-turn regarding tree preservation on the site.
- Any plans to situate trees temporarily in the allotments would deprive many of the benefits of gardening while adding too much shade to the area. [This is not part of the submission.]
- If it is truly impossible to retain the trees they must be replaced with strong healthy trees and they must still be as many on the site.
- No public notice. [Notices in respect of conditions are not displayed.]
- The trees provide a backdrop to the allotments.
- There are few green spaces within the Golden Lane Estate or around the heavily polluted City/Islington border.
- The trees will form an important barrier between the service access and Hatfield House. Retaining the trees to mask the sight, noise and smells is the very least that can be done to mitigate this.
- There has been no real attempt to retain the trees.
- The trees are a part of the character of the Golden Lane Estate.

Considerations

All the affected trees are located within the London Borough of Islington and therefore regard should be had to their policies as well as the City's own Local Plan policies

The relevant policies are set out at Appendix A

In considering other construction options that would allow all trees to be retained, and the impacts for the redevelopment of the Richard Cloudesley School site regard should be had to the decisions of both local planning authorities in determining that the redevelopment should be permitted

Principal Issues

9. The principal issues in considering this application are:

- The ecological value of the trees.

- The condition of the trees.
- Other construction options which would allow the trees to be retained.
- The acceptability of the replacement trees.
- The acceptability of the tree protection measures for the retained trees.
- Compliance with development plan policies

The ecological value of the trees

10. The Preliminary Ecological Appraisal, prepared by Ambiental, submitted as part of the planning application confirmed that the trees on the site were determined to be of negligible bat roost potential due to a lack of sustainable roost features. Trees T1, T2, T3 and T4 do not exhibit any observable bat roosting characteristics. The report further surveyed for the potential of emerging bats and bat foraging activity. No bats were observed emerging from or entering either the buildings or trees.

11. The report has been assessed by LBI's Nature Conservation Manager who is satisfied that the applicant's Ecologists have made adequate checks for bat roosts and have made sensible recommendations. The applicant's Ecologist has recommended that:

    - A suitably experienced Ecologist should oversee the demolition of the roof and any other potential roost features;
    - The level of artificial lighting should be kept to a minimum, particularly around the site boundaries and near to the hedgerows and tree lines. Low pressure lights are a preferred option to high pressure sodium or mercury lamps, and lights should be directed low with minimal light spillage. Ideally some parts of the site should be kept dark, preferably at bat emergence (0-1 hour after sunset) and during peak bat activity periods (1.5 hours after sunset and 1.5 hours before sunrise). Artificial lighting should not directly illuminate any potential bat commuting areas such as hedgerows and treelines. Similarly, and new planted linear features or buffer areas around the site boundary should not be directly lit.
    - In order to avoid any potential impacts on breeding birds, any vegetation clearance should be carried out outside of the main bird nesting season which runs from March to August inclusive.
    - Bird and bat boxes should be installed.

12. Details of lighting would be secured under conditions 30 and 31, bird and bat boxes would be secured under condition 36 and condition 57 protects nesting bird, and an informative was included which advised that the grant of the planning permission does not override any

statutory requirement to notify Natural England and/or obtain a licence prior to carrying out activities which may harm or disturb protected species such as bats.

13. A bat survey has been produced by residents. Ambiental have reviewed this report and advise that it does not provide sufficient evidence to contradict the conclusions produced within the submitted Ambiental Report which concludes that there are no bat roosts within the trees.

The condition of the trees

14. The applicant's Arboricultural Impact Assessment states that trees T1, T2, T3 and T4 are category C trees. BS 5837:2012 (Trees in relation to design, demolition and construction. Recommendations) defines category C trees as 'trees of low quality with an estimated remaining life expectancy of at least 10 years or young trees with a stem diameter below 150mm. T1 and T2 have outgrown their small raised planting bed and have inadequate soil volume to sustain either stability or long term health.

15. LBI's Arboricultural Manager agrees with the applicant's assessment and has accepted the removal of these trees and CoL's Open Spaces Team agrees with this view.

Other construction options which would allow the trees to be retained

16. In coming to the conclusion that trees T1, T2, T3 and T4 need to be removed, several options have been considered by the applicant, which are:

    1. Leaving the trees in situ
    2. Hand dig the foundations to minimise the impact on the trees
    3. Relocating the school hall
    4. Altering the below ground construction
    5. Moving the mechanics and engineering (M&E) routes
    6. Utilising offsite modern methods of construction

Leaving the trees in situ

17. The applicant advised that the construction of the school hall would encroach into the Root Protection Area (RPA) of the trees by 4m and the works would cause damage to the tree roots. There is a risk that they would become unstable and create a hazard if they fell. If the trees were retained in situ and failed once the school hall has been completed specialist and costly tree surgery would be required to remove the damaged trees and hand dig the tree pits for the replacement trees. A mobile crane would be required to lift the replacement trees into place, which would need to be located in the

school playground or Basterfield Service Road and would need to be of a sufficient size to reach over the newly constructed buildings.

18. Furthermore to install the brickwork façade for the hall a scaffold structure would be required to create a safe working area. To create space for this, extensive pruning to the existing tree canopy would be required, which would be over and above the constraints detailed in BS 5837:2012 (Trees in relation to design, demolition and construction. Recommendations) and effectively result in the removal of the trees. The scaffold components cannot be erected through the tree canopy due to the safety implications of scaffolders working through the tree canopy.

19. If the trees were retained in situ the movement of plant would be impeded due to the tree canopy, as this would restrict the location of the excavators and mobile cranes while undertaking these works. The trees could cause a near miss or accident if plant becomes entangled in the canopy.

20. The option of leaving the trees in situ has been discounted by the applicant as they consider leaving the trees in situ with clear knowledge that they would be damaged is misleading and irresponsible.

Hand dig the foundations to minimise the impact on the trees

21. The tree roots in this area are particularly delicate and would be damaged even if a hand dig approach was taken to excavation in this area. Even if it was possible to hand dig the foundations the ground floor slab of the consented school hall would encroach into the RPA of the trees and it would not, therefore, be possible to construct the building without damaging the tree roots.

Relocating the school hall

22. The school hall would have to be relocated eastwards by 4m to avoid any conflict with the RPA. This would constitute a major change to the permitted scheme, which would require a further planning permission. The applicants advise that this would result in delays to the project, which would delay the school opening and increase cost, and may ultimately cause the project to fail. The relocation of the school hall would also cause detrimental impacts to the scheme including:

    - Reduction in the school play space;
    - Reduction in space for new trees;
    - The need for Basterfield Service Road to be used for site facilities as it would not be possible to include them within the site;
    - Reduction in the size of the loading bay for construction deliveries resulting in the potential for increased construction site traffic on the public highway

Altering the below ground construction

23. When it was determined that the school hall could not be relocated options for redesigning the below ground works were considered. However, the proximity of the consented school hall to the RPA means that all options would have an impact on the trees.

24. The deep ground beam along the southern elevation needs to be provided to facilitate the level change between Basterfield Service Road and the site. There are no alternative design options for this aspect of the scheme and it would be required even if the school hall were to be relocated. The RPA is encroached by this ground beam.

25. Due to the RPA overlapping the school hall footprint the slab cannot be deepened as the roots would hinder potential access to install the slab below.

26. Reducing the slab depth would still impact on the RPA as shallow roots would be damaged by the construction of the slab.

27. The use of a cantilevered slab as an alternative below ground construction method has been considered. However, this method would still encroach on the RPA as a result of the proximity of the ground floor slab to the tree roots.

Moving the mechanics and engineering (M&E) routes

28. Mains water, gas, electrical and telecommunications duct runs are proposed to run where the existing trees are located. These service runs cannot be relocated to other areas of the site as the service rooms have been located on the western side of the consented school hall as this would provide the most efficient run from the main school building to the school hall. Altering the locations of these service rooms would require a redesign of the development. Furthermore, maintenance and access to the service runs would also potentially be an issue due to reduced access area.

Utilising offsite modern methods of construction

29. Modern methods of construction include the preparation of elements off-site. For a scheme of this nature this would involve the use of pre-cast panels. This is an expensive solution in comparison to traditional methods, and would have a detrimental impact on the viability of the scheme. In any event accessing the site with pre-cast panels would also require extensive tree pruning.

30. The applicant's submissions regarding other construction options are considered sound.

The acceptability of the replacement trees

31. It is proposed that the removed trees would be replaced at the end of the construction phase by three 7m silver birch trees.

32. LBI's Arboricultural Manager has stated that the mitigation is broadly acceptable a net increase of trees and a potential increase in canopy cover is presented.

33. LBI's Arboricultural Manager requested further information on the soil volume to be provided for the replacement trees and is now satisfied that it would be sufficient to achieve parity with amenity provided by the existing trees. The CoL's Open Spaces Team advises of the need for irrigation.

The acceptability of the tree protection measures for the retained tree

34. The LBI's Arboricultural Manager is satisfied that the tree protection measures detailed in the submitted Arboricultural Method Statement are sufficient to ensure that tree T5 can be retained.

Compliance with Policy

35. The Development plan policies are those within the London Plan and the City of London Local Plan. The London Borough of Islington's policies are also a material consideration. These are all set out in Appendix A. Development proposals are required to enhance green infrastructure, support urban greening and biodiversity and protect trees. While the discharge of the conditions as recommended would result in temporary loss of trees, their replacement would be secured and the development as a whole will result in a net increase in tree numbers

Conclusion

36. The trees are of limited ecological value and are category C trees due to their low quality. To safeguard them requires significant amendments and delay to the scheme, which is not warranted in these circumstances. The proposed replacement trees and associated tree pits and the measures proposed to safeguard tree T5 are satisfactory. LBI's Officers are satisfied with the proposals. It is therefore recommended that the condition is discharged.

Background Papers

Internal

Email, Open Spaces, 9th January 2018

External

Email, London Borough of Islington, 14th January 2019

Letter, Anna Parkinson, 16th November 2018

Email, Tracy Caton, 16th November 2018

Email, Ruth Flaherty, 17th November 2018

Email, Alfred Godsmark, 17th November 2018

Letter, Fred and Joanna Rodgers, 17th November 2018

Email, Liz Johnston Drew, 17th November 2018

Email, Mary Tapissier, 17th November 2018

Email, Paul Lincoln, 17th November 2018

Email, Tom Martin, 17th November 2018

Email, Deborah Phillips, 18th November 2018

Email, Christine Ten-Hoopen, 18th November 2018

Email, Daniel Swallow, 18th November 2018

Email, David Henderson, 18th November 2018

Email, Deborah Cherry, 18th November 2018

Email, Deborah Tyler, 18th November 2018

Email, Kate Sandle, 18th November 2018

Email, Paul Drinkwater, 18th Novermber 2018

Email, Rachel Wheeler, 18th November 2018

Email, Susanne Levin and Matthew Bell, 18th November 2018

Letter, Emma Matthews, 18th November 2018

Email, Holger Mattes and Phoebe Unwin, 18th November 2018

Email, William Pimlott, 18th November 2018

Email, Nigel Smith, 18th November 2018

Letter, Bev Bytheway, 19th November 2018

Email, Tim Godsmark, 19th November 2018

Email, Allison Parkes, 19th November 2018

Email, Alex Mosey, 19th November 2018

Email, Helen Fentimen, 19th November 2018

Email, Jaqueline Swanson, 19th November 2018

Email, Jane Carr, 19th November 2018

Email, Paul O’Brien, 19th November 2018

Letter, Carl Gardner, 20th November 2018

Appendix A

London Plan Policies

The London Plan policies which are most relevant to this application are set our below:

Policy 2.18 Protect, promote, expand and manage the extent and quality of and access to London's network of green infrastructure.

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Policy 3.3 Ensure the housing need identified in the London Plan is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London which would enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.

Policy 3.5 the design of all new housing should enhance the quality of local places. Minimum space standards should be incorporated.

Policy 3.11 Maximise affordable housing provision and seek an average of at least 13,200 more affordable homes per year in London over the term of the London Plan.

Policy 3.16 Protection and enhancement of social infrastructure - additional and enhanced social infrastructure provision to meet the needs of a growing and diverse population.

Policy 3.18 Support the provision of education facilities to meet growing demand and to enable educational choice..

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.6 Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 5.9 Reduce the impact of the urban heat island effect in London and encourage the design of places and spaces to avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change and the urban heat island effect on an area wide basis.

Policy 5.10 Promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

Policy 5.11 Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.

Policy 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences would be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 5.18 Encourage development waste management facilities and removal by water or rail transport.

Policy 6.1 The Mayor would work with all relevant partners to encourage the closer integration of transport and development.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 6.5 Contributions would be sought from developments likely to add to, or create, congestion on London's rail network that Crossrail is intended to mitigate.

Policy 6.9 Developments should provide secure, integrated and accessible

cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.3 Creation of safe, secure and appropriately accessible environments.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character,

development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.5 London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Policy 7.6 Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

c comprise details and materials that complement, not necessarily replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

e incorporate best practice in resource management and climate change mitigation and adaptation

f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level

h meet the principles of inclusive design

i optimise the potential of sites.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Policy 7.13 Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards.

Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Policy 7.15 Minimise existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals and separate new noise sensitive development from major noise sources.

Policy 7.18 Resist the loss of local protected open spaces unless equivalent or better quality provision is made within the local catchment area.

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Policy 7.19 Development proposals should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

Local Plan Policies – City of London

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

b) measures to be integrated with those of adjacent buildings and the public realm;

c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

CS4 Planning Contributions

To manage the impact of development, seeking appropriate contributions having regard to the impact of the contributions on the viability of development.

CS5 The North of the City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

CS10 Promote high quality environment
To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

DM10.1 New development
To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

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

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;
c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS12 Historic Environment

To preserve and enhance those buildings and areas which make an important contribution to the City's historic and archaeological heritage and provide an attractive environment for the City's communities and visitors.

DM12.1 Managing Change affecting all heritage assets and spaces

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

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.

CS14 Tall buildings
To allow tall buildings of world class, sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

CS15 Creation of sustainable development
To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.1 Sustainability requirements
1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

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

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions
1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
   a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
   b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
   c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon

homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for

pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

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.

DM16.3 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.

DM16.5 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.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.2 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.

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.

DM19.4 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:

a) 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;
b) where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;
c) 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;
d) 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.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.1 Location of new housing

1. New housing should be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential and commercial uses will be permitted.
2. New housing will only be permitted where development would not:

a) prejudice the primary business function of the City;

b) be contrary to policy DM 1.1;
c) inhibit the development potential or business activity in neighbouring commercial buildings and sites; and
d) result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.

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.

DM21.5 Housing quality standards

All new housing must be designed to a standard that facilitates the health and well-being of occupants, and:

a) takes account of the London Plan's space standards and complies with the London Plan's Density Matrix standards;
b) provides acceptable daylight to dwellings commensurate with a city centre location;
c) meets standards for Secured by Design certification;
d) maximises opportunities for providing open and leisure space for residents.

CS22 Social infrastructure and opportunities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM22.1 Location and protection of social and community facilities

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.

Local Plan Policies – London Borough of Islington

CS15 identifies the importance of trees and open spaces in the Borough "protecting all existing local open spaces, including open spaces of heritage value, as well as incidental green space, trees and private gardens"

DM 6.5 maintains that new development must protect, contribute to and enhance the landscape, biodiversity value and growing conditions of the development site and surrounding area including protecting connectivity between habitats.