

Background Papers:

Internal

Email, City Surveyors, 6th January 2020

Memo, Air Quality Officer, 17th January 2020

Memo, Environmental Health Officer, Department of Markets and Consumer Protection, 11th February 2020

External

Email, NATS Safeguarding, 3rd January 2020

Letter, City of Westminster, 7th January 2020

Letter, Rev'd Arani Sen, Rector St Olave's Hart Street, 13th January 2020

Letter, Georgina Graham, Archdeaconry of London, 13th January 2020

Email, Richard Bennett, 14th January 2020

Letter, Environment Agency, 16th January 2020

Letter, Natural England, 20th January 2020

Email, Heathrow, 21st January 2020

Letter, London City Airport, 22nd January 2020

Letter, Network Rail, 23rd January 2020

Letter, City Heritage Society, 27th January 2020

Letter, Historic Royal Palaces, 27th January 2020

Letter, London Borough of Southwark, 27th January 2020

Email, Thames Water, 31st January 2020

Email, Ministry of Housing, Communities, and Local Government, 4th February 2020

Letter, London Borough of Tower Hamlets, 10th February 2020

Letter, Historic England, 13th February 2020

Letter, Transport for London, 18th February 2020

Letter, Tim Orchard, The Drapers' Company, 24th February 2020

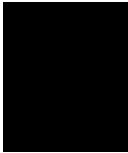
Letter, Generali, 28th February 2020

Letter, Historic England, 28th February 2020

Letter, Historic England, 28th February 2020

Letter, Nicholas Hunter Jones, Merchant Taylors' Company, 3rd March 2020 Letter, Carpenters' Company, 6th March 2020

Letter, Mark Aspinall, The Mercers' Company, 6th March 2020

From: [NATS Safeguarding](#)
To: [PLN - Comments](#)
Cc: [NATS Safeguarding](#)
Subject: RE: Planning Application Consultation: 19/01307/FULEIA [SG29172]
Date: 03 January 2020 08:40:34
Attachments: 

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

D: 01489 444687

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 02 January 2020 15:17
To: NATS Safeguarding 
Subject: Planning Application Consultation: 19/01307/FULEIA

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Sir/Madam

Please see attached consultation for 50 Fenchurch Street London EC3M 3JY .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans

Department of the Built Environment

City of London

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Your ref: 19/01307/FULEIA
My ref: 20/00016/OBS

Please reply to: Nikki Mitchell
Tel No: 020 7641 2681
Email: southplanningteam@westminster.gov.uk

Catherine Evans
City of London
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

7 January 2020

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.:	20/00016/OBS	Application Date:	
Date Received:	02.01.2020	Date Amended:	02.01.2020

Plan Nos:

Address: Fenchurch Street, City Of London, London, EC3M 6DE

Proposal: i) Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft

landscaping and other associated works. (The total proposed floor area of the new building is 94,336 sq.m GIA, comprising 88,064 sq.m of office floorspace, 289 sq.m of flexible retail floorspace (A1/A2/A3), 550 sq.m of flexible retail floorspace (A1/A3/A4), 789sq.m of livery hall floorspace, 214sq.m of crypt floorspace and 430sq.m of winter garden floorspace). The building would rise to a maximum height of 149.6m when measured from the lowest office ground floor level, 165.1m AOD).

Yours faithfully



Deirdra Armsby
Director of Place Shaping and Town Planning

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.





**REV'D ARANI SEN
RECTOR, ST OLAVE'S HART STREET**

St Olave Church 8 Hart Street London EC3R 7NB

Catherine Evans
Development Division
Department of the Built Environment
City of London
Po Box 270
Guildhall
London EC2P 2EJ

Monday 13th January 2020

Dear Ms Evans

Ref: 19/01307/FULEIA

Thank you for the notice regarding the proposed development of the site located at 50 Fenchurch Street London EC3M 3JY.

We respond to the application on behalf of the Parochial Church Council of St Olave Hart Street.

We are supportive of the planned development of the above-named site. The Clothworkers' Company have been extremely diligent in working together with the Diocese and ourselves as the Parish of St Olave Hart Street with All Hallows Staining and St Catherine Coleman to understand the impact of the proposed development on the Parish and surrounding areas. Although the existing hall will be demolished, because of the collaboration between the Parish and the Clothworkers, resources can be accessed to promote the mission of the parish. As a parish the PCC is very keen to continue and develop its strong historic relationship with the Clothworkers' Company and the Rector acting as their chaplain.

With respect to the project, we are pleased to note that consideration has been given to public access to the open spaces within the build, such as the roof garden to be situated at level 10, the historic Crypt and the Tower of All Hallows Staining, which is very much part of the heritage of this parish. As a PCC we think it is important that there are community hall facilities for people living in more deprived parts of the City and in this respect we are pleased that St Botolph-without-Aldgate community hall will be developed.

We always hope that such a project will take into account the responsibility to ensure London Living Wage is paid to all workers and that the benefits that come from this scheme are spread through all socio-economic groups.

We do not object to the development and welcome the opportunity for social enterprise and local flourishing that this project promises to deliver.

Yours sincerely

The Rev'd Arani Sen
Rector

Mr Graham Mundy
Church Warden

8 Hart STREET
LONDON EC3R 7NB




— DIOCESE OF —
LONDON
TWO CITIES AREA

Catherine Evans
Development Division
Department of the Built Environment
City of London
Po Box 270
Guildhall
London EC2P 2EJ

Monday 13th January 2020

Dear Ms Evans

Ref: 19/01307/FULEIA

Thank you for the notice regarding the proposed development of the site located at 50 Fenchurch Street London EC3M 3JY, to which I am pleased to respond.

In principle we are supportive of the planned development of the above-named site. The Clothworkers' Company ("the Clothworkers") have been extremely diligent in working together with the Diocese and the Parish of St Olave Hart Street with All Hallows Staining and St Catherine Coleman ("St Olave's") to understand the impact of the proposed development on the Parish and surrounding areas. Although the existing hall will be demolished, because of the collaboration between the Parish and the Clothworkers, St Olave's will be able to increase its missional endeavours. Additionally, the Clothworkers have played a pivotal role in the redevelopment of the church hall located within the Parish of St Botolph-without-Aldgate with Holy Trinity Minorities ("St Botolph's") which will facilitate more community space and become the nexus between the local parishes which serve the more deprived areas of the City.

With respect to the project, we are pleased to note that consideration has been given to public access to the open spaces within the build, such as the roof garden to be situated at level 10, the historic Crypt and the Tower. Recognising that the continued development of very tall buildings is sensitive, particularly as we work to preserve the protected sight-lines of St Paul's Cathedral and other historic buildings, we note that the vertical greening will assist in the reduction of urban heat and air pollution – at this critical time when climate change impacts our poorest and most vulnerable 'neighbours' most severely.

We always hope that such a project will take into account the responsibility to ensure London Living Wage is paid to all workers and that the benefits that come from this scheme are spread through all socio-economic groups.

In this case, we do not object to the development and welcome the opportunity for social enterprise and local flourishing that this project promises to deliver.

Yours sincerely



Georgina Graham
Operations Manager
Archdeaconry of London

The Office of the Archdeacon
The Old Deanery, Dean's Court, London EC4V 5AA

From: [Richard Bennett](#)
To: [PLN - Comments](#)
Subject: Clothworkers Hall
Date: 14 January 2020 08:20:43

I object to the demolition of Clothworkers Hall, an historical part of London to make profit for people who won't even pay tax, to ruin the landscape and destroy what is good about London.

Richard Bennett



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Catherine Evans
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Our ref: NE/2020/131268/01-L01
Your ref: 19/01307/FULEIA

Date: 16 January 2020

Dear Catherine,

i) Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft landscaping and other associated works. (The total proposed floor area of the new building is 94,336sq.m GIA, comprising 88,064sq.m of office floorspace, 289sq.m of flexible retail floorspace (A1/A2/A3), 550sq.m of flexible retail floorspace (A1/A3/A4), 789sq.m of livery hall floorspace, 214sq.m of crypt floorspace and 430sq.m of winter garden floorspace. The building would rise to a maximum height of 149.6m when measured from the lowest office ground floor level, 165.1m AOD.)

**Site Bounded By Fenchurch Street, Mark Lane, Dunster Court And Mincing Lane.
London EC3M 3JY**

Thank you for consulting us on the above application. We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

Cont/d..

We recommend, however, that the requirements of the [National Planning Policy Framework](#) and [National Planning Policy Guidance](#) (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be in addition to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our [Groundwater Protection](#) guidance (previously covered by the GP3) and CLR11 (Model Procedures for the Management of Land Contamination).

In order to protect groundwater quality from further deterioration:

- No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution.
- Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.
- Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies, in line with paragraph 170 of the National Planning Policy Framework.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

- From www.gov.uk:
 - [The Environment Agency's approach to groundwater protection](#) (2017)
 - Our [Technical Guidance Pages](#), which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
 - Use [MCERTS](#) accredited methods for testing contaminated soils at the site
- From the [National Planning Practice Guidance](#):
 - [Land affected by contamination](#)
- [British Standards](#) when investigating potentially contaminated sites and groundwater:
 - BS 5930:2015 Code of practice for site investigations;
 - BS 10175:2011+A2:2017 Code of practice for investigation of potentially contaminated sites
 - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points
 - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as

the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

You may wish to consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.

Thank you again for consulting us. If you have any queries please get in touch at HNL.SustainablePlaces@environment-agency.gov.uk.

Yours sincerely,

Mr Matthew Pearce
Planning Advisor

Telephone: 0207 714 0992

E-mail: HNL.SustainablePlaces@environment-agency.gov.uk

Address: Environment Agency, 3rd Floor, 2 Marsham Street, London, SW1P 4DF

Date: 20 January 2020
Our ref: 304908
Your ref: 19/01307/FULEIA



Ms C Evans
The Department of the Built Environment
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Crewe Business Park
Electra Way
Crewe
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CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

PLNComments@cityoflondon.gov.uk

Dear Ms Evans,

Planning consultation: i) Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft landscaping and other associated works. (The total proposed floor area of the new building is 94,336sq.m GIA, comprising 88,064sq.m of office floorspace, 289sq.m of flexible retail floorspace (A1/A2/A3), 550sq.m of flexible retail floorspace (A1/A3/A4), 789sq.m of livery hall floorspace, 214sq.m of crypt floorspace and 430sq.m of winter garden floorspace. The building would rise to a maximum height of 149.6m when measured from the lowest office ground floor level, 165.1m AOD.) This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from Gerald Eve LLP, 7 Welbeck Street, London, W1G 0AY.

Location: 50 Fenchurch Street London EC3M 3JY

Thank you for your consultation on the above, dated and received by Natural England on 02 January 2020.

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 sincerely,

Elizabeth Ball
Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's 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 Natural England Open Data Geoportal. Our initial screening indicates that one or more Impact Risk Zones have been triggered by the proposed development, indicating that impacts to SSSIs are possible and further assessment is required. You should request sufficient information from the developer to assess the impacts likely to arise and consider any mitigation measures that may be necessary.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Protected Species

Natural England has produced standing advice¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included 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. The list of priority habitats and species can be found here². Natural England does not routinely hold 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, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities 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 SSSI or in exceptional circumstances.

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Protected landscapes

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 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 in order to respect 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 & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

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 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [*Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*](#), and we recommend its use in the design and construction of development, including any planning conditions. 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.

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 other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
 - Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
 - Planting additional street trees.
 - Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

From: Connor Gladwin <Connor.Gladwin@heathrow.com> on behalf of DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Sent: 21 January 2020 16:21
To: PLN - Comments
Subject: RE: Planning Application Consultation: 19/01307/FULEIA

Good Afternoon

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

Kind regards,

Connor Gladwin
Aerodrome Compliance Support Manager
Airside Safety & Assurance
Airside Operations



Airside Operations Facility, Building 16887
Heathrow Airport
Hounslow, Middlesex, TW6 2GW

m: 07834623372 | e: connor.gladwin@heathrow.com
w: heathrow.com | t: twitter.com/heathrowairport | a: heathrow.com/apps
i: [instagram.com/heathrow_airport](https://www.instagram.com/heathrow_airport) | l: [linkedin.com/company/heathrow-airport](https://www.linkedin.com/company/heathrow-airport)

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 02 January 2020 15:17
To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 19/01307/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 50 Fenchurch Street London EC3M 3JY .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans
Department of the Built Environment
City of London

LPA Ref: **19/01307/FULEIA**

London City Airport Ref: 2020/LCY/001

Date: 22/01/2020

Dear Catherine Evans,

RE: 19/01307/FULEIA

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 current safeguarding criteria.

LPA Reference	19/01307/FULEIA
Proposal	<p>Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and</p>

	reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft landscaping and other associated works.
Location	50 Fenchurch Street London EC3M 3JY
Borough	City of London
Case Officer	Catherine Evans
Absolute maximum height (mAOD)	165m AOD

London City Airport suggests the following condition/s are added to this application. London City Airport's response must change to an objection unless these conditions are applied to this planning permission:

1. Cranes:

No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes and if it is deemed necessary these are assessed against LCY's Instrument Flight procedures (IFPs) by a CAA approved procedure designer. These then has to be submitted to the Local Planning Authority for approval in writing having consulted with London City Airport.

Reason: The use of cranes or tall equipment in this area has the potential to impact LCY operations, therefore they must be assessed before construction.

2. Landscaping and bird hazard management

No Construction Works in respect of any Building shall be carried out unless and until a detailed scheme for green and/or brown roofs and associated aggressive bird management strategy has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. All green and/or brown roofs should be designed to make them unattractive to birds so as not to have an adverse effect on the safety of operations at London City Airport by encouraging bird roosting and creating sources of food for birds, and thereby presenting a bird strike threat to aircraft operating at the Airport.

Reason: This site's location is within London City Airport's area of concern with respect to bird strikes. Details provided have given insufficient certainty that there will be no elevated risk to aircraft through birdstrike.

3. Photovoltaic panels:

No photovoltaic panels shall be sited on any Building or structure within the Development unless and until the full details of the proposed location and manufacturers specification(s), for each complete installation has been submitted to and approved by Local Planning Authority, the Local Planning Authority having consulted London City Airport.

4. RADAR assessment:

Construction shall not commence until an assessment has been carried out on the impact of this development on the RADAR coverage. This needs to be authorised by the Local Planning Authority having consulted with London City Airport and NATS En Route Limited.

5. Lighting condition:

No Building shall be Occupied unless and until full details of any proposed external lighting (the External Lighting Scheme) for the relevant Building has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. Each External Lighting Scheme shall include details of the appearance and technical details/specifications, intensity, orientation and screening of lamps, siting and the timing of installation and each External Lighting Scheme is to be constructed and / or installed prior to Occupation of the relevant Building and shall be retained and maintained for so long as the Building shall exist.

6. Antenna and plant condition:

No satellite antenna, apparatus or plant of any sort (including structures or plant in connection with the use of telecommunication systems or any electronic communications apparatus) shall be erected on the roof of any Buildings unless and until details of their size and location have previously been submitted to and approved by the Local Planning Authority in consultation with London City Airport.

Where a Local Planning Authority proposes to grant permission against the advice of London City Airport Limited, or not to attach conditions which London City Airport Limited has advised, it shall notify London City Airport Limited, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

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,

Szilvia Turcsik
Technical Operations Coordinator



Nicholas Donoghue

1 Eversholt Street,

London,

NW1 2DN

Nicholas.Donoghue@networkrail.co.uk

23rd January 2020

City of London,

PO Box 270,

Guildhall, London

EC2P 2EJ

Network Rail Consultation Response – Planning Application 19/01307/FULEIA

Dear Sir/Madam,

I am writing to provide you with Network Rail's formal comments in relation to the planning application 19/01307/FULEIA.

The proposed part 9, 31 and 35 storeys office mixed-use development is located within close proximity to Fenchurch Railway Station. As stated within the Transport Statement, the proposed development will generate 1394 rail trips both in the AM and PM peak travel time.

Given the large number of trips expected, Network Rail's Station Capacity team are currently carrying out a full assessment of the development and its potential impact on the operational usage of the station. This will enable Network Rail to identify if any mitigation would be required.

Network Rail will keep the council updated on the outcome of this assessment. In the mean time if the council or applicant have any question in the relation to this letter, please do not hesitate to contact me.

Kind Regards,

Nicholas Donoghue

Town Planning Technician | Property

Network Rail

1 Eversholt St | London | NW1 2DN

M 07732 639934

E Nicholas.Donoghue@networkrail.co.uk

www.networkrail.co.uk/property



City Heritage Society

Please reply to: -

35 Eagle Court,
Hermon Hill,
London E11 1PD
Tel.

27 01 2020

City of London, Department of Planning & Transportation,
The Guildhall,
London EC2 P2EJ

Dear Sirs,

**Site Bounded by Fenchurch Street, Mark Lane,
Dunster Court, & Mincing Lane
London EC3M 3JV**

Having examined the proposed plans and visited the site we conclude that the buildings to be demolished are not of architectural or historic value though it is hoped that some of the sculptural elements of the present Clothworkers Hall, such as the coat of arms, might be rescued and incorporated into either the new Hall or located in the revamped public space.

It seems that the crypt has already been relocated in the past so we can see no reason to object to its being moved again.

We commend the opening up to views from Fenchurch St of the mediaeval church tower and its improved setting and public access. We also commend the clarity of the design the new building in making the Clothworkers' Hall element so distinctive and the lower floors being treated as a podium to the tower which we feel reduces the impact of the proposed tall building on Fenchurch Street.

Yours faithfully

Peter Luscombe

[CHS Chairman]



27 January 2020

Director of the Built Environment
Development Division
City of London
PO Box 270
Guildhall
London EC2P 2EJ

For the attention of Catherine Evans, Case Officer

By email to: PLNcomments@cityoflondon.gov.uk

Historic Royal Palaces is the charity that looks after:

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Banqueting House
Kensington Palace
Kew Palace
Hillsborough Castle

We help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built.

We raise all our own funds and depend on the support of our visitors, members, donors, sponsors and volunteers.

Dear Madam

50 Fenchurch Street, London EC3M 3JY - Redevelopment

Planning Application Ref: 19/01307/FULEIA

Thank you for your letter of 02 January 2020 notifying Historic Royal Palaces of the City's receipt of this planning application from the Clothworkers' Company relating to the redevelopment of their Clothworkers' Hall site.

Historic Royal Palaces was unaware that development proposals were being drawn up during 2019 and discussed with officers from the City and Historic England until we were invited by the Clothworkers' Company to a presentation about the proposals in November of last year: it then became apparent that the scheme was already at an advanced stage. We were told that a public consultation exercise was about to be launched and that a formal planning application would follow shortly afterwards. Historic Royal Palaces subsequently wrote to the Clothworkers' Company on 06 December 2019, setting out our pre-application response to the proposed development. The letter was copied to the City Corporation and to Historic England, but a further copy is attached, for ease of reference.

As guardians of the Tower of London World Heritage Site (WHS), Historic Royal Palaces considers that the development as proposed would have a damaging effect on aspects of the 'Outstanding Universal Value' of the Tower WHS. We summarise below our key concerns about and objections to the proposal as set out in greater detail in our pre-application response.

Location - the proposed development is a 'tall building' in terms of City planning policy (being over 70m AOD) and comparable in height to 20 Fenchurch Street, but it is located *outside* the identified City Cluster area of tall buildings, both as existing in the adopted City Local Plan 2015 and as revised in the Draft City Plan 2036. The application site is located on the south-eastern side of the City Cluster, at the point where its boundary is closest to the Tower of London WHS and it

would encroach into the remaining relatively-open space separating the Tower from the eastern side of the Cluster. Historic Royal Palaces considers that it is vitally important for this space to remain free of tall buildings, which could have a highly damaging effect on the setting of the WHS and puts its World Heritage inscription at risk.

Proximity – the proposed development would be very close to the Tower WHS and its visual dominance of approaches to, and views from within, the Tower, particularly from the main entrance and the publicly-accessible Wall Walks, would be greatly exacerbated by the proximity of the proposed building. The photographic images included in the visual impact study by MillerHare submitted with the application, although of course technically accurate, are two-dimensional. The human eye sees three-dimensionally and focuses first on, and is drawn to, what is nearest. The outward views experienced by the 3 million-plus visitors who enter and walk around the Tower every year, in addition to the millions who enjoy the public space around the Tower without entering it, would thus, in Historic Royal Palaces' opinion, be detrimentally affected by the closeness of the proposed building, which would dominate many outward views. The impact will be even greater in winter when the trees shown in the views are not in leaf and the lights are on.

Scale – whilst the tall, bulky development proposed would appear against the 'silhouette' of existing and consented buildings in the Cluster in the *London View Management Framework* (LVMF) views 25A. 1-3 from the Queen's Walk and 10A.1 from Tower Bridge, it would be highly intrusive in many local views from the Tower because of its height and size. In particular, in sequential views eastwards along the North Wall Walks, the proposed building would move south-westwards into the important open sky-space between 20 Fenchurch Street and the City Cluster, appearing to link the two.

Given the very significant concerns we set out in our letter of 06 December 2019 to the Clothworkers' Company and have summarised above, Historic Royal Palaces would urge the City to refuse the application in its present form and to ask the applicant to reconsider both the quantum and height of the proposed development, in order to mitigate the harmful visual impact we believe the current scheme would have on the Tower itself and on the setting of the Tower of London WHS and its Outstanding Universal Value.

I am copying this letter to Duncan Wilson, Chief Executive, Historic England and Tom Foxall, Head of Region, London and South-East, Historic England, for their information.

Yours faithfully



Adrian Phillips
Palaces & Collections Director

020 3166 6380
adrian.phillips@hrp.org.uk

Copy: Duncan Wilson, Historic England
Tom Foxall, Historic England

6 December 2019

Clothworkers' Hall
Dunster Court
Mincing Lane
London EC3R 7AH

FAO: Jocelyn Stuart-Grumbar



Historic Royal Palaces is
the charity that looks after:

Tower of London
Hampton Court Palace
Banqueting House
Kensington Palace
Kew Palace
Hillsborough Castle

We help everyone explore
the story of how monarchs
and people have shaped
society, in some of the
greatest palaces ever built.

We raise all our own funds
and depend on the
support of our visitors,
members, donors,
sponsors and volunteers.

Dear Jocelyn

Proposed Development at 50 Fenchurch Street, London

Thank you for arranging for us to be sent a comprehensive package of information about the development you are proposing at 50 Fenchurch Street, following the presentation of the scheme to us last month at the Clothworkers' Hall.

As you will know, Historic Royal Palaces is an independent charity charged with the upkeep and protection of the Tower of London World Heritage Site (WHS) and a key aspect of our role is seeking to ensure that new development within the setting of the WHS does not have a damaging effect on its 'Outstanding Universal Value' (OUV). In the wider context, the conservation of London's heritage is so important of course to the city and to the values of one of the world's most historic and attractive cities, which we are sure you will be mindful of.

Our principal concern regarding the development at 50 Fenchurch Street is the potential visual impact the proposal might have on the Tower itself and the north-eastern setting of the WHS.

The detailed information provided, particularly the accurate visual representations (AVRs) prepared by MillerHare, has been helpful in enabling us to make a considered assessment of the scheme. We recognise the carefully considered approach to, and quality of, the design of the proposed building by Eric Parry Architects and the various public benefits that the development would offer; unfortunately, these do not serve to mitigate the considerable concerns that Historic Royal Palaces has about the scheme. These relate to the location of the development outside the City Cluster of tall buildings; its proximity to the Tower of London WHS; and its very significant scale, both height and bulk.

Location

At a height of 165.5m AOD, the proposed development falls within the City's definition of a 'tall building' (anything of 70m AOD or more). 50 Fenchurch Street is not, however, located within the City Cluster policy area, either as it is currently defined in the adopted City Local Plan 2015, or as revised in the Draft City Plan 2036. The development site lies outside

the south-eastern boundary of the Cluster area, which runs along Fenchurch Street: it would thus stand in the 'neutral' zone between the Tower of London and the existing and consented tall buildings in Cluster.

The development would, in Historic Royal Palaces' view, therefore set a further damaging precedent for the ongoing increase of the Cluster area and its continuing encroachment into the vital remaining space separating it visually from the WHS. The proposed new tall building would be comparable in height to 20 Fenchurch Street (the Walkie Talkie), which was granted planning consent at a called-in inquiry and was originally regarded by the City as an 'outlier', separate from the Cluster. Historic Royal Palaces was repeatedly assured that the space between the two would not be infilled. However, the Draft City Plan 2036 shows the boundary of the Cluster area extended to include 20 Fenchurch Street (which we have objected to in our consultation response), opening up the possibility, in principle at least, of the two being joined by a line of further tall buildings. If the proposed development at 50 Fenchurch Street were to be permitted, how soon would the boundary of the Cluster area be revised again to include it, allowing very tall buildings to creep eastwards, ever closer to the Tower of London WHS?

Proximity

The proposed development at 50 Fenchurch Street would be extremely close to the Tower of London WHS. MillerHare's visual impact study shows that, in the London View Management Framework Views 25A.1-3 (from the Queen's Walk on the South Bank) and 10A.1 (from Tower Bridge, North Bastion), the proposed development would be seen against and, to an extent, appear to blend into, the tall buildings of the Cluster, as existing and consented. In the local views from within the WHS and the Tower itself, which have helpfully been provided, the picture is very different.

The viewpoints for these local views are identified in the *Tower of London Local Setting Study* 2010. This study, commissioned by Historic Royal Palaces on behalf of the Tower WHS Consultative Committee, was prepared to meet an objective identified in the Tower of London WHS Management Plan (2008), '...to act in partnership with statutory authorities and others as appropriate to preserve and enhance the local setting of the WHS'. The Management Plan itself is, of course, a material consideration in the determination of applications affecting the WHS and its setting. The Study provides a detailed assessment of the Tower's local setting, identifies key views of and from the Tower and suggests management guidelines for the local setting. The Study has been commended by UNESCO's World Heritage Committee as an exemplar of its type and the relevant local planning authorities' local plans refer to it as guidance which developers should take into account when considering proposals likely to affect the setting of the WHS.

In these important local views, which will be experienced by the Tower's 3m annual paying visitors, plus the millions more that enjoy the Tower environs, the proposed new building at 50 Fenchurch Street would appear intrusively close, especially in MillerHare's views 12 and 13, from the northern Wall Walk and 14, from the Byward Tower entrance. These visual representations, although technically accurate, nevertheless present a 'flat' photographic image, whereas, in reality, the human eye would be immediately drawn to and focus on what is nearest. In these views, the City Cluster buildings, standing behind 50 Fenchurch Street, would appear

more distant: the proposed development, because of its proximity and scale, would give the impression of being almost adjacent to the Tower, looming over it. The visual impact study views also show trees in full leaf and these have a softening and screening effect, especially in views 10 (from the Inner Ward, looking over the chapel of St Peter ad Vincula) and 16 (from the Inner Ward, south of the White Tower, looking north-west). The over-bearing effect of the proposed development would be intensified for at least six months of the year, when the trees are without leaves.

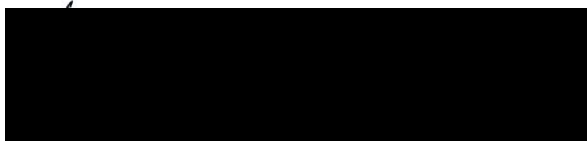
Scale

In Historic Royal Palaces' view, the significant height and bulk of the proposed tall building contributes to its visual intrusiveness in views from the Tower. This is evident in all the MillerHare local views, but particularly in views 12 and 13 (from the northern Wall Walks of the Tower), where, due to the angle of the views, the proposed development would appear in the sky space between the west side of the Cluster and 20 Fenchurch Street. This effect is evident also in views 10 and 16. In all of these views, the articulation of the building as two conjoined blocks does little to disguise its overall bulk and the placing of the taller element on the western side unfortunately appears to extend the western 'shoulder' of the City Cluster towards 20 Fenchurch Street,

In conclusion, given the very significant concerns we have set out above, Historic Royal Palaces would ask your Company as a matter of urgency to reconsider both the quantum of development proposed on this site and the current articulation of the tall commercial element in order to mitigate the harmful visual impact we believe the current scheme would have on the setting of the Tower of London WHS and therefore on its Outstanding Universal Value.

I am copying this letter to Annie Hampson, Chief Planning Officer and Development Director at the City Corporation, Duncan Wilson, Chief Executive, Historic England and Mike Dunn, Principal Inspector for Historic Buildings and Areas in London, Historic England, for their information.

Yours sincerely



Adrian Phillips
Palaces & Collections Director

Copy: Annie Hampson, City of London Corporation
Duncan Wilson, Historic England
Michael Dunn, Historic England

FORMAL COMMENTS TO ADJOINING BOROUGH

LBS Registered Number: 20/OB/0001

Date of issue of this decision: 27/01/2020



www.southwark.gov.uk

LBS Reg. No.: 20/OB/0001

Date of Issue of Decision: 27/01/2020

Your Ref No.:

Applicant Catherine Evans
City of London

NO COMMENTS made in reference to your consultation on the following development:

Request for observations from City of London for i) Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft landscaping and other associated works.

At 50 Fenchurch Street London EC3M 3JY

In accordance with your letter received on 3 January 2020 and supporting documents.

Signed: *Simon Bevan* Director of Planning

Site address: 50 Fenchurch Street London EC3M 3JY

Reference: 20/OB/0001

;

From: [Contact Centre](#)
To: [Pln - CC - Development Dc](#)
Subject: FW: PLN FW: 19/01307/FULEIA - SITE BOUNDED BY, FENCHURCH STREET, LONDON, EC3M 3JY
COL:05095190
Date: 03 February 2020 10:36:53
Attachments: [image001.png](#)
[image002.png](#)

From: Devcon Team <devcon.team@thameswater.co.uk>

Sent: 31 January 2020 15:55

To: Planning Queue <PlanningQueue@cityoflondon.gov.uk>

Subject: 19/01307/FULEIA - SITE BOUNDED BY, FENCHURCH STREET, LONDON, EC3M 3JY
Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London
EC2P 2EJ

31 January 2020

Our DTS Ref: 62994 Your Ref: 19/01307/FULEIA

Dear Sir/Madam

Re: SITE BOUNDED BY, FENCHURCH STREET, LONDON, EC3M 3JY

Waste Comments

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.

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) 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. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-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 you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Working-near-or-diverting-our-pipes>.

[site/Planning-your-development/Working-near-or-diverting-our-pipes.](#)

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing wwriskmanagement@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 Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks 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 properties shall be occupied until confirmation has been 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 additional properties to be occupied. 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" 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 (telephone 0203 577 9998) prior to the planning application approval. 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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-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) 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. 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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully,

Development Planning

Landline 020 3577 9998

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From: Marc Bernstein <Marc.Bernstein@communities.gov.uk>
Sent: 04 February 2020 14:44
To: PLN - Comments
Subject: RE: Planning Application EIA Notification: 19/01307/FULEIA

Dear Ms Evans

I acknowledge receipt of the environmental statement relating to the above proposal.

I confirm that we have no comments to make on the environmental statement.

Regards,

Marc Bernstein
Corporate & Casework Team Support Officer Planning Casework Unit (PCU) SE Quarter, Third Floor, Fry Building, 2
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-----Original Message-----

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 03 January 2020 14:06
To: PCU <PCU@communities.gov.uk>
Subject: Planning Application EIA Notification: 19/01307/FULEIA

Dear Sir/Madam

Please see attached notification for 50 Fenchurch Street London EC3M 3JY .
Please send any response to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans
Department of the Built Environment
City of London

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Director of the Built Environment

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Contact: Adam Garcia
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SENT BY EMAIL

10 February 2020

Dear Ms Evans

City of London Ref: 19/01307/FULEIA

Tower Hamlets Ref: PA/20/00015

Address: 50 Fenchurch Street, London, EC3M 3JY

Proposal: Observation requested by City of London request for i) Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft landscaping and other associated works.

(The total proposed floor area of the new building is 94,336 sq.m GIA, comprising 88,064 sq.m of office floorspace, 289 sq.m of flexible retail floorspace (A1/A2/A3), 550 sq.m of flexible retail floorspace (A1/A3/A4), 789sq.m of livery hall floorspace, 214sq.m of crypt floorspace and 430sq.m of winter garden floorspace). The building would rise to a maximum height of 149.6m when measured from the lowest office ground floor level, 165.1m AOD)

INTRODUCTION

Thank you for your letter of 02 January 2020 notifying the London Borough of Tower Hamlets of the City of London's receipt of the above mentioned planning application.

On 03 December 2019, the London Borough of Tower Hamlets provided observations following a request from the City of London for an Environmental Impact Assessment Scoping Opinion on the proposed development in question. The Borough raised significant concerns regarding the proposed assessment of aspect chapters and matters within construction, existence, and operation phases as shown in Table 1 of the Scoping Report. Of particular concern were the following:

- Adverse effects from noise and air quality during construction;
- Adverse effects from increases in traffic on LBTH road network once operational (including associated effects on noise and air quality);
- Adverse effects on public transport which could affect LBTH;
- Adverse effects on views and townscape from and within LBTH;
- Adverse effects on heritage assets;
- Adverse cumulative effects with other developments.

The London Borough of Tower Hamlets is very concerned to learn that Historic Royal Palaces, as guardians of the Tower of London World Heritage Site, were unaware that development proposals were being drawn up until they were invited by the Clothworker's Company to a presentation in November 2019. As with any development proposal of this scale, it can only be presumed that between this time and the validation of the planning application in early 2020, that the design proposals were at their most advanced stage, and as such any consultation with HRP would have been tokenistic. In addition to this, the London Borough of Tower Hamlets were notified of the development only by way of the above mentioned observation request for an EIA Scoping Opinion, and no request for a meeting with officers was ever made.

The advice contained within this letter sets out the Council's assessment and conclusions which will inform the response to the request for observations. The proposed development's height would have a significant adverse impact on the Grade I listed Tower of London World Heritage Site (WHS) including its setting and townscape views.

PROPOSED DEVELOPMENT

The proposed development is for the demolition of the existing building at 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and Clothworker's Hall and the erection of a 35 storey (165.1m AOD) building.

The demolition of the existing buildings on the site does not cause concern for the London Borough of Tower Hamlets and as such comments are provided on the basis of the proposed building.

HERITAGE

Location

The application site is located to the north-west of the Tower of London, which is a World Heritage Site containing a number of listed buildings as well as being located within Tower Hill Conservation Area. The Outstanding Universal Value of the World Heritage Site is based on, amongst other things, a demonstration and symbol of Norman power, reflecting the last military conquest of England. The strategic location of the site in its prominence in the townscape is a key component of this value.

The introduction of the proposed development raises serious concerns about the degree of visual separation between the eastern cluster and the Tower of London, which would be harmful to the significance of the World Heritage Site. The proposed development is a tall building in terms of the City of London's planning policy (in excess of 70m AOD). The Planning Statement submitted in support of the application (document ref: 2.01 Planning Statement, Gerald Eve, December 2019) makes a disingenuous claim that the site is "*located on the southern perimeter of the City Cluster*", firstly in paragraph 2.19 and then throughout the document. This is misleading; the site is located outside of the identified City Cluster area of tall buildings, both within the adopted City Local Plan 2015 and within the Draft City Plan 2036. The application site is located on the south-eastern side of the City Cluster, in a location that would encroach into a space separating the Tower from the eastern side of the City Cluster. Figures 1 and 2 below sets out the approximate location of the building overlaid onto the City of London's existing and emerging plans.

Figure 1: Existing Local Plan - Relevant Policy CS7

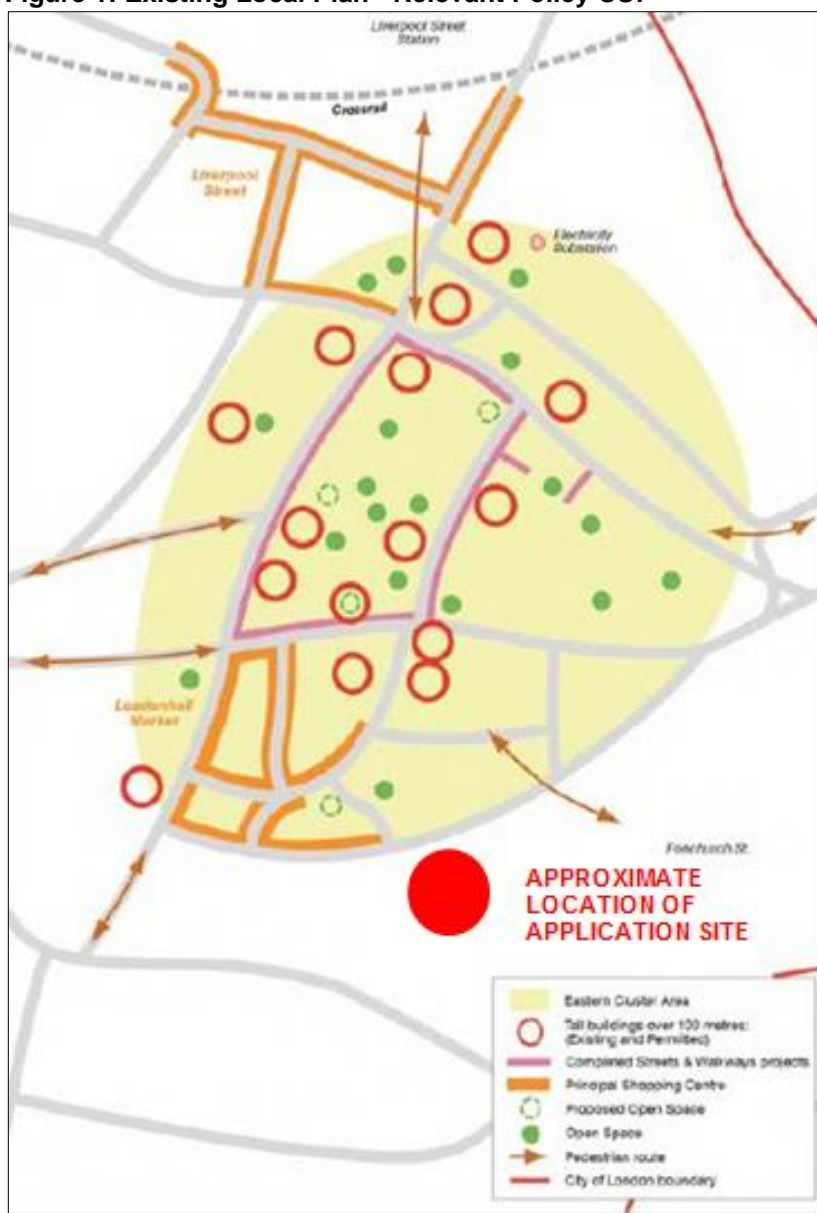
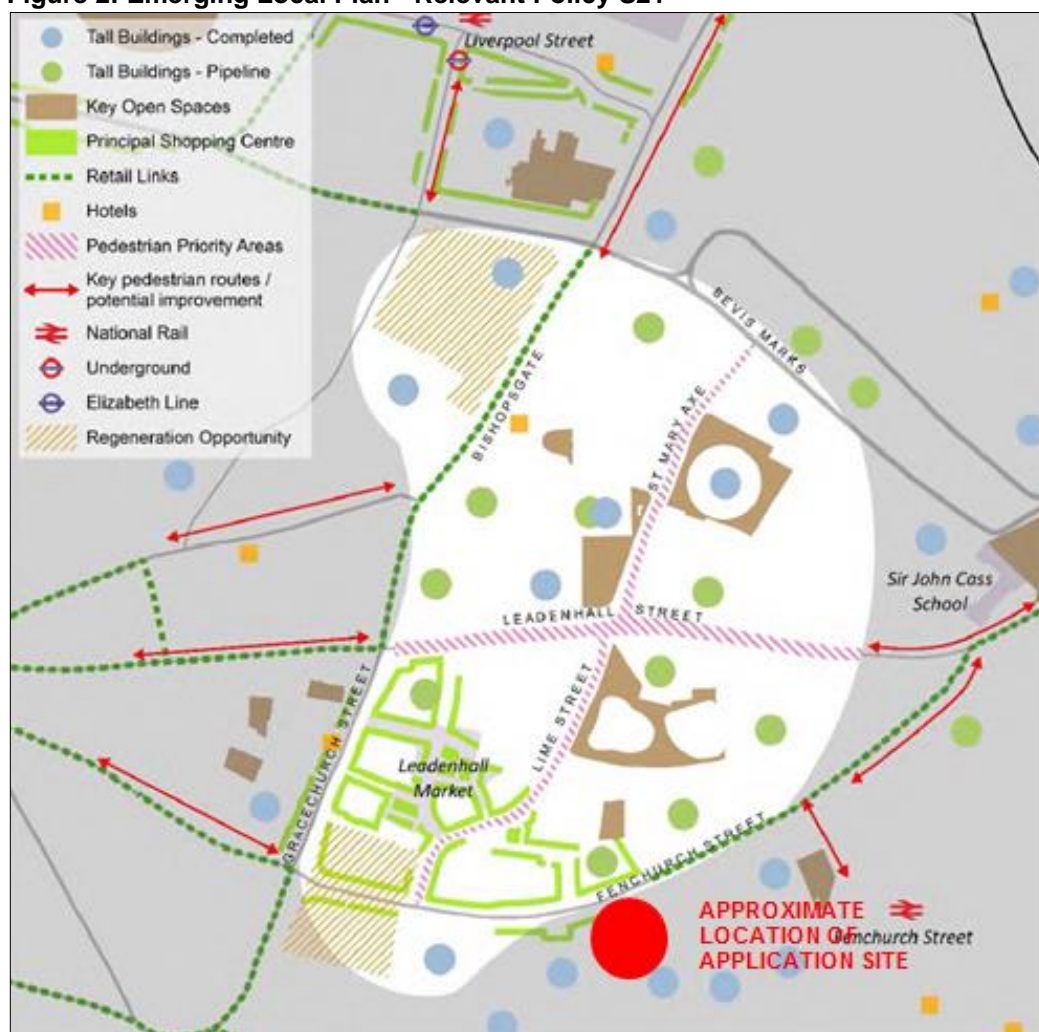


Figure 2: Emerging Local Plan - Relevant Policy S21



As noted above, existing and emerging local policy provide support for the principle of tall buildings within the Eastern Cluster. It is noted in the reasoned justification for Policy S21 of the Draft City of London Plan 2036 (supporting text 7.6.4) that the spatial extent and redevelopment potential of the cluster has been informed by a 3D modelling process undertaken by the City of London. This planned approach to modelling impacts of future tall building proposals accords with Policy 7.7A of the London Plan (2016) which states that tall and large buildings should be part of a plan-led approach and Para' 15 of the NPPF (2019) which states that the planning system should be genuinely plan-led.

The imposition of the proposed development in this location would therefore undermine the plan-led approach to the development of the eastern cluster, contrary to Policy 7.7A of the London Plan (2016) and the plan-led approach advocated by the NPPF (2019).

Proximity to the Tower of London World Heritage Site

With respect to heritage assets, Policy 7.8 of the London Plan (2016) and Policy HC1 of the Draft London Plan require that developments affecting the setting of heritage assets, including conservation areas, listed buildings, scheduled monuments and World Heritage Sites, should conserve their significance. Additionally, Policy 7.10 of the London Plan (2016) and Policy HC2 of the Draft London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate Outstanding Universal Value (OUV), integrity, authenticity or significance.

The existing and emerging context of the City Cluster as defined in local policy is of utmost importance and has been highlighted in the Mayor of London's decision to refuse permission for a 305.3m AOD tall building (serving as a visitor attraction) at the land adjacent to 20 Bury Street in the City of London (GLA/4868/02 and City of London ref: 18/01213/FULEIA). This building was proposed in the City Cluster however the Mayor found that *"The proposed development would be detrimental to the setting of the Tower of London World Heritage Site by reason of its height, form, design and materiality, along with the proximity and prominence which would adversely affect the following attributes of the Outstanding Universal Value of the Tower; the physical prominence of the White Tower; the site's strategic and landmark setting; and the site's status as an internationally famous monument"*.

The application in question is no doubt lower in height than that at the land adjacent to 20 Bury Street however it is nevertheless a tall building located *outside* of the policy area for tall buildings. The International Council on Monuments and Sites (ICOMOS) advised in their consultation response to the above mentioned application (dated March 2019)

"That the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable approach to allow further negative visual impact on the property's integrity when it is already threatened".

The London Borough of Tower Hamlets concurs with the assertion that the Tower of London World Heritage Site has already reached its limit in terms of visual impact. It is also important to note that this assessment was made on the grounds of a building within the City Cluster policy area.

Figure 3: Tower of London, Inner wall, east of Devereux Tower – Existing



Figure 4: Tower of London, Inner wall, east of Devereux Tower – Cumulative



As demonstrated in the submitted Townscape, Built Heritage and Visual Impact Assessment (document ref: 3.01 ES Volume 02 Townscape, Built Heritage and Visual Impact Assessment dated December 2019) many of the outward views would be detrimentally affected by the proximity of the proposed building as it would dominate the gap which exists in this area (see figures 3 and 4). The assertion in paragraph 6.12 of the document that “*Development would ensure that it appears part of the Eastern Cluster*” is not justified and it can only be assumed that this statement could be substantiated by the building’s partial coalescence with those which have been built or are planned for sites within the City Cluster. The consented buildings at 1 Undershaft and 100 Leadenhall Street would also intrude into this view when complete; however, the harm arising from the proposal must be considered in isolation as well as cumulatively. The location of the building, outside of the City Cluster, combined with its significant height, mass and bulk would draw increased attention to modern development when looking out of the North Wall Walks. This impact will be greater in the winter when the trees shown in the view are not in leaf.

The prominence of the proposal would also draw increased attention to modern development outside of the Inner Ward affecting the sense of intended enclosure at the centre of the concentric defences which culminate in the White Tower. As before, this impact will be increased in the winter months when the trees are not in leaf and the impact would be experienced through a greater expanse of the Inner Ward (see page 87 of the THVIA).

It is evident from the views provided (namely those on pages 84-99 of the THVIA) that the building is located significantly further away from the City Cluster and closer to the WHS. As a consequence, this has the visual imposition of stepping forward towards the boundary of the WHS. It is this proximity that would exacerbate the building’s visual dominance and would result in harm to the setting and thereby significance of the Tower of London WHS and would adversely affect the following attributes of the physical prominence of the White Tower; the concentric defences and; the site’s strategic and landmark setting.

Strategic Views

The proposed development is also considered to detract from Strategic Views, as set out in the London View Management Framework SPG (2012). The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. Policies 7.11, 7.12 of the London Plan (2016) and the LVMF SPG outline the views of strategic importance to London, and detail how these views should be managed.

LVMF View 10A.1 is a River Prospect, looking upstream, and originates from the North Bastion of Tower Bridge, a Grade I listed building of national significance. The elevated view enables the fine detail and layers of history of the Tower of London WHS to be readily understood. The significance of this viewing place is also highlighted within the World Heritage Site Management Plan Setting Study as being one of the best places from which to view the WHS.

The proposed building would appear to the left-hand side of the Leadenhall Building and 22 Bishopsgate, infilling a significant portion of open sky set behind much lower buildings within the City and behind the WHS. The cumulative effect of existing and consented developments from this view is already severe. The proposed development would pose an additional challenge to this backdrop compromising the integrity of the view even further. The building's significant bulk would be in direct contrast to the emerging form of the tall building cluster and to the architecture of the Tower of London. This would serve to challenge the dominance of the Tower of London as a key feature in the view, altering the composition of the view and fail to give appropriate context to the Tower of London, harming the viewers' ability to appreciate this important aesthetic and cultural landmark.

CONCLUSIONS

The London Borough of Tower Hamlets is of the view that the proposals would result in a significance adverse impact on the Grade I listed Tower of London WHS including its setting and townscape views.

The proposals would diminish the ability to appreciate the OUV of the Tower of London WHS. As illustrated in LVMF views 10A.1 and views from within the Inner ward and North Wall Walk, the height, mass and bulk of the proposals, along with its proximity to the Tower of London WHS are considered to adversely affect the following attributes of the OUV; the physical prominence of the White Tower; the concentric defences; the site's strategic and landmark setting; and the site's status as an internationally famous monument.

Yours sincerely,

Adam Garcia

Senior Planning Officer (West Area Team)

For and on behalf of the Divisional Director for Planning and Building Control, London Borough of Tower Hamlets





Historic England

Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Our ref: P01149022

13 February 2020

Dear Ms Evans

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

**50 FENCHURCH STREET LONDON EC3M 3JY
Application No. 19/01307/FULEIA**

Thank you for your letter of 2 January 2020 regarding the above application for planning permission. Further to our advice at pre-application stage, and on the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Due to its location to the south and east of the City Cluster, the proposed commercial tower would increase the cumulative impact of the Cluster on the setting of the Tower of London World Heritage Site. Although the scheme would be set against the backdrop of the Cluster in some key views, it further increases the relative prominence of the City from other locations, and will as a result cause some harm to the significance of the Tower.

Historic England welcomes the proposed conservation and representation of the tower of All Hallows Staining and Lambe's Chapel Crypt. The removal of the clutter that currently surrounds these and their representation within the context of a positive public realm proposal should enhance the ability to appreciate their heritage significance.

Historic England Advice

Heritage impacts within the site

The site contains the Grade I listed (12th or 13th century onwards) tower that formed part of the demolished church of All Hallows Staining, and the 12th century Grade II listed Lambe's Chapel Crypt, which was relocated to this site in the late 19th century. There is a Certificate of Immunity from listing for the Clothworkers' Hall, which is a competent neo-Georgian design by a noted architect, albeit a typical, rather than a particularly notable, example of a rebuilt post war Livery Hall.



Historic England, 4th Floor, Cannon Bridge House, Dowgate Hill, London, EC4R 2YA
Telephone 020 7973 3700
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 site is located within 500m of the Tower of London World Heritage Site and is not located in a conservation area. It is not within the City's Eastern Cluster where tall buildings are encouraged on suitable sites. Nevertheless, it is not in a location identified as inappropriate in principle for tall buildings (City Plan 2015).

The proposed scheme involves the demolition of all buildings on the site except the listed church tower, which will be underpinned and built under, and the excavation of the associated parish burial ground. In their place a new Clothworkers' hall will be constructed, along with a 35 storey, plus plant (149.6m), tall building providing commercial office space. The Crypt will be re-integrated within the new building, and new public realm is proposed across the site.

Historic England welcomes the conservation and representation of the listed buildings and the removal of the clutter in their immediate setting. While the new commercial building is significantly larger than the existing structures that form much of the setting of the listed church tower, we do not consider that the additional contrast in scale causes any further harm to the significance of the listed building. This is because the tower's setting currently makes a very limited contribution to the ability to understand and appreciate its significance. Furthermore, the proposal to make the ground floor plan of the church legible in the public realm, and the opening up of views and access between the church tower and Fenchurch Street, will increase the public's ability to appreciate and interact with the tower. Similarly, the integration of Lambe's Chapel Crypt within the new Clothworkers' Hall will allow it to be conserved in a scholarly manner and allow more people to enjoy its heritage significance.

Given the multi-phase construction history of the tower of All Hallows Staining, and the fragile nature of medieval structures generally, if you are minded to grant permission we strongly encourage you to require the final engineering details and the sequence of activities related to the underpinning for approval prior to this part of the scheme being implemented. These will need to be designed by an engineer with relevant experience working on historic buildings as well as requiring input from the main works contractor when appointed. We also suggest the same level of specialist oversight for the relocation of the listed Lambe's Chapel Crypt, the details of which should also be secured by condition of any permission.

We also note that the proposal involves the loss of an entire parish burial ground. While we do not wish to comment on this aspect of the scheme, Historic England, along with the Church of England and Ministry of Justice, has published Guidance for Best Practice for the treatment of human remains excavated from Christian Burial Grounds in England (APABE, 2017). You may find paragraphs 1, 14, 172, 173, 206, 216, and 217 helpful.

Heritage impacts beyond the site

Due to its height and bulk the proposed tall building will have impacts on heritage assets beyond the site boundary. The most notable of these is the Tower of London, inscribed as a UNESCO World Heritage Site and designated as a scheduled monument and a series of listed buildings, as well as being located within The Tower Conservation Area. This is a heritage asset of the highest significance, which is

internationally recognised to be of Outstanding Universal Value (OUV). The NPPF (para. 184) states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

We have carefully reviewed the impacts on the Tower of London, visited the Tower and considered the Heritage Impact Assessment (HIA).

In our view the attribute of the World Heritage Site's OUV that is affected by this development in its setting is the 'landmark siting, for both protection and control of the City of London... a crucial demarcation point between the power of the developing City of London, and the power of the monarchy...'.¹ The Tower of London World Heritage Site Management Plan provides further detail on this dynamic relationship, notably in paragraphs 7.3.16 and 7.3.18.

The Management Plan also highlights the importance of views of and from the Tower that may be sensitive to development in the City when visible in the background of the Tower, particularly in the vicinity of the White Tower. Paragraphs 7.3.17 and 7.3.27 highlight the importance of the silhouette and relative scale of the Tower, and the importance of decision makers considering the cumulative impacts of development in the City affecting the ability to recognise, understand and appreciate the OUV of the World Heritage Site. The relative prominence and status of the Tower and the City, in relation to one another, is therefore an important element to consider when assessing the likely impact on the ability to appreciate the OUV. Further details on the views considered important to appreciating the OUV are contained in the London Views Management Framework (2012) and the Tower of London Local Setting Study (2010).

These important elements of the OUV of the World Heritage Site are applicable also to the significance of the Tower's scheduled monument and listed buildings. While, for the sake of clarity, we focus here on OUV, you will nonetheless need to take into account all statutory duties relating to other designations in making your decision.

The ability to appreciate the OUV of the Tower is tested in the Townscape Heritage Visual Impact Assessment and the HIA. We do not agree with the consultants' conclusion that impacts of the proposal on almost all views relating to the World Heritage Site will be positive, but we consider that in the most important views for understanding and appreciating the OUV, notably from the Queen's Walk (LVMF view 25A.1-3) and from the North Bastion of Tower Bridge (LVMF view 10A.1), the impacts will be neutral. This is because the new tall building will be seen as part of, and against the backdrop of, the established City Cluster, and will not act as either a distracting presence or affect the relative status of the Tower and the City. In these views we do not consider that there are any additional cumulative impacts, and the ability to appreciate the OUV does not change.

However, in views from within the World Heritage Site, notably from the southern Wall Walks and the Inner Ward, the proposed tall building begins to expand the envelope of the City Cluster and will increase its overall mass. From the Inner Ward

¹ Statement of Outstanding Universal Value for the Tower of London World Heritage Site: <https://whc.unesco.org/en/decisions/1544/>

the most prominent buildings will remain those in the foreground, notably the White Tower, imposingly built in solid masonry with architectural detailing designed to draw the eye and visually dominate. Tall buildings within the City Cluster already appear in these views, but each addition to the mass of the Cluster makes it more of a distracting presence. From these locations the additional cumulative impacts will be relatively minor.

From the northern Wall Walks, the impact of the proposal will be greater. Here visitors look out over the Outer Wall and Ditch to the Liberties and City beyond. From these views the City Cluster will appear appreciably larger, with the proposed tall building closer to the World Heritage Site and its constituent scheduled monument and listed buildings. This will increase the prominence of the City Cluster relative to those parts of the Tower experienced from the Wall Walks. In our view this would cause some harm to the scheduled monument, listed buildings and to the attribute of the OUV relating to the Tower's landmark siting, as it will further change the relationship between the City and the Tower, cumulatively increasing the relative status of the former.

The powerful masonry towers both of the Inner and Outer Walls will remain the dominant features in the foreground, so in our view the harm identified is relatively low, but this is nonetheless one of a number of changes within the Tower's setting which cumulatively increase the prominence of the City. The relevant policy test here is therefore whether this additional impact compromises a viewer's ability to appreciate the World Heritage Site's OUV, integrity, authenticity or significance (7.10B London Plan). Because this scheme does not affect those views where the attributes of OUV can best be appreciated, we think that this ability is only marginally affected, but you will need also to consider the effects of changes which, on a cumulative basis, could have a more significant effect (NPPG, Paragraph: 032 Reference ID: 18a-032-20190723). Because of the exceptional significance afforded to World Heritage Sites, no harm should be permitted unless demonstrably outweighed by public benefits. Paragraphs 193, 194 and 196 of the NPPF are the key paragraphs for decision makers to consider in order to ensure that these impacts are correctly weighed in the planning balance.

Recommendation

We recommend that you weigh the harm to heritage significance identified in this letter against the public benefits of the scheme, as required by paragraph 196 of the NPPF. Heritage benefits described above to the tower of All Hallows Staining may be treated as a public benefit for these purposes, but should not be seen as mitigation for the harm caused to the OUV of the Tower of London WHS.

As with all proposals with the potential to harm the Outstanding Universal Value of World Heritage Sites, we also encourage you to notify the State Party (DCMS) of this proposal. DCMS will then make a decision on whether to notify the World Heritage Centre.

Yours sincerely,



David English

Development Advice Team Leader: London and the South East

E-mail: david.english@HistoricEngland.org.uk

Direct Dial: 020 7973 3747



To: Catherine Evans
From: Max Faulkner

Phone: 020 7126 2562
Date: 18/02/20

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TfL Spatial Planning Reference: City/20/2

Borough Reference: 19/01307/FULEIA

Location: 50 Fenchurch Street

Proposal: i) Demolition of 41-43 Mincing Lane, 40-54 Fenchurch Street, former church hall and the Clothworkers' Hall and its redevelopment to provide a new building comprising four levels of basement (including a basement mezzanine level), ground, mezzanine, plus part 9, 31 and 35 storeys plus plant containing offices (B1) and flexible shop/financial and professional services/cafe and restaurant uses (A1/A2/A3) at ground floor level; and flexible shop/cafe and restaurant/drinking establishment uses (A1/A3/A4) at levels 10 and 11, including winter garden (Sui Generis); ii) Reprovision of the Clothworkers' accommodation (Sui Generis) within part ground, part first, part second and part third floors and four levels of basement (including a basement mezzanine level); iii) Creation of ground level public access to level 10 roof garden and basement level 1 to Grade II Listed crypt; iv) Dismantling, relocation and reconstruction of the Lambe's Chapel Crypt to basement level 1 and associated exhibition accommodation (Sui Generis) (listed Grade II); v) Alterations to and conservation of the Grade I Listed Tower of All Hallows Staining; vi) Provision of new hard and soft landscaping and other associated works. (The total proposed floor area of the new building is 94,336sq.m GIA, comprising 88,064sq.m of office floorspace, 289sq.m of flexible retail floorspace (A1/A2/A3), 550sq.m of flexible retail floorspace (A1/A3/A4), 789sq.m of livery hall floorspace, 214sq.m of crypt floorspace and 430sq.m of winter garden floorspace. The building would rise to a maximum height of 149.6m when measured from the lowest office ground floor level, 165.1m AOD.)

Many thanks for consulting TfL on the above application. TfL offer the following comments:

The site is located at 40-54 Fenchurch Street, approximately 300 metres from Gracechurch Street, which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about

any proposal that may affect the safety and movement of traffic and pedestrians on the TLRN.

The Intend to Publish London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It is expected that all planning decisions within London should follow London Plan policies. As such, TfL now expects all new planning applications to be compliant with the policies in the new London Plan.

General

TfL welcomes that the applicant has produced the Transport Assessment (TA) in a Healthy Streets format in line with TfL's updated guidance. TfL also welcomes that an Active Travel Zone (ATZ) assessment has been produced. TfL is supportive of the City of London securing funding from the applicant towards the improvements identified within the ATZ assessment.

Trip generation

TfL requests the applicant outlines their justification for increasing the mode share extracted from census data for cycling from 2% to 16% within the TA. This reduces London Underground (LU) and train mode share significantly. It is requested that this justification is shared with TfL to ensure the effect of the development on London Underground and trains is not being underestimated.

In table 21, 23, 24 and 25 of the submitted TA, TfL would expect LU to be split out appropriately by station, line and direction. Docklands Light Railway (DLR) and London Overground (LO) should also be appropriately split out.

The (TA) has not assessed the impact of additional demand on any stations. TfL therefore requests the applicant assesses key/pinch point areas using publicly available data as a basis from which the developer should be able to follow the station planning standards to calculate the impact on station elements of additional demand.

TfL requests the applicant confirm how a train capacity figure has been identified when the Metropolitan, Circle/District/Hammersmith and City, Waterloo and City and Central Lines all have different rolling stocks.

Public realm and Healthy Streets

TfL is supportive in principle of wider footways on Fenchurch Street in line with policy T2 (Healthy Streets) of the new London Plan. However the southern footway of Fenchurch Street will be in shadow for much of the day. Furthermore the additional space offered is within the colonnade of the new building proposed. It would therefore add little in terms of footway capacity to cope with high pedestrian flows.

As it is a narrow street, we would question whether it is appropriate to have tall buildings, without any stepping back, on both sides of Fenchurch Street. This is reflected in the lower Pedestrian Comfort Level (PCL) scores achieved at footway locations 29A and 29B in Table 31 of the TA.

The TA also acknowledges in Tables 34, 35 and 36 that levels of crowding and comfort at key pedestrian crossings immediately adjacent to the proposed development, which are clearly likely to be used by workers and visitors there, are expected to worsen significantly. The PCL classification of E is considered unacceptable and is well below the recommended minimums in TfL guidance unless public realm improvements including new crossings, which have been proposed in the City of London's City Cluster Vision, are delivered before the proposed development opens. The minimum PCL classifications recommended by TfL for different urban contexts are included at Appendix A of this response.

As a result of the expected PCLs and potentially dangerous pedestrian crowding at key local crossings, TfL requests confirmation that these impacts will be mitigated or prevented prior to being supportive of the application.

TfL is supportive of the increase in public realm space within the footprint of the site. However, TfL requests confirmation that all new privately managed public realm proposed will be permanently publicly accessible in compliance with policy D8 (Public realm) of the new London Plan. This is especially important given the proposed loss of public access to Star Alley.

Section 7.2.2 of the TA argues that the City Cluster Vision will alleviate pedestrian congestion, specifically crossing Fenchurch Street from the proposed development, to an acceptable level. TfL requests the applicant justifies the methodology behind this conclusion.

Finally whilst TfL appreciates the increase in public realm space and trees, it seems likely this will be outweighed by the negative environmental implications of demolishing and rebuilding and therefore the application may not comply with policy SI 7 (Reducing waste and supporting the circular economy) of the new London Plan.

Car Parking

The proposed development is car free which is supported in line with policy T6.2 (Office parking) of the new London Plan. However, no disabled parking is proposed as part of the development. Section 4.6.1 of the Transport Assessment (TA) identifies blue badge on street parking provision in close proximity of the site. This may be acceptable. However TfL seeks confirmation that the journey between the local on street blue badge parking and the site is totally step-free and suitable for wheelchair users.

Furthermore between Monday and Friday the maximum stay is four hours. If this solution for disabled parking is deemed acceptable by the City of London, TfL would recommend increasing/extending the hours available on weekdays for local on-street blue badge parking, in case it needs to be used by employees at the new development. This would comply with policy T6.5 (Non-residential disabled persons parking) of the new London Plan.

Deliveries, servicing and Vision Zero

TfL is satisfied in principle with the swept path analysis drawings submitted for the loading bays proposed. However the location of the cycle parking entrance in relation to the loading bay could potentially lead to conflicts between delivery vehicles and cyclists accessing the cycle entrance from Mincing Lane. This risk should be minimised by strong and proactive management of deliveries on site to ensure they take place outside of cycling arrival and departure peaks.

The outline Delivery and Servicing Plan (DSP) estimates the proposed development will generate 115 daily delivery and servicing trips, including 8 during peak hours. TfL is supportive of the commitment for deliveries to be scheduled to avoid the 0700-1000, 1200-1400 and 1600-1900 as explained above. However it appears that the TA still predicts 8 servicing trips in those peak hours (see Section 6.6).

TfL therefore requests further clarification on how servicing trips will be managed and scheduled to avoid peak hours, to ensure the proposed development supports Policy 3 (Vision Zero) of the Mayor's Transport Strategy (MTS).

TfL requests a full DSP is secured by condition and discharged in consultation with TfL prior to the development becoming operational.

Cycle parking

The development proposes 1,175 long stay cycle parking spaces for the office use and 42 short stay cycle parking spaces located in the public realm.

The level of long stay cycle parking proposed for the office use complies with the minimum standards set out in policy T5 (Cycling) of the new London Plan.

Long stay cycle parking is proposed in basement levels 1 and 3 and includes provision for 5% oversized/adapted cycles. The provision of end of journey facilities is strongly supported and complies with policy T5 (Cycling) of the new London Plan.

As per draft London Plan Policy T5 AA, cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS). The LCDS can be found in TfL's online Streets Toolkit at: <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>.

TfL requests the applicant confirms all cycle parking will comply with the LCDS. Specifically that:

- A minimum aisle width of 2500mm beyond the lowered frame is provided for the proposed two tier racks.
- The dimension of the cycle parking lift is clarified. The lift should have minimum dimensions of 1.2m by 2.3m.
- The external door widths exceed the minimum of 2 metres and that any doors to the cycle parking area is automated, push button or pressure pad operated.

The amount of short stay cycling parking proposed does not comply fully with policy T5 (Cycling) of the new London Plan. Subject to the applicant exploring the availability of space on level 1 for short stay cycle parking, TfL accepts a flexible approach to short stay cycle parking may need to be applied in this specific case given space constraints in the local public realm.

Construction

TfL requests a full Construction Logistics Plan is secured by condition and discharged in consultation with TfL prior to construction commencing.

TfL reminds the applicant that to further support the Mayor's Vision Zero objective from October 26 2020 all Heavy Goods Vehicles (HGVs) more than 12 tonnes entering or operating in Greater London will need to hold a valid HGV safety permit, granted if the vehicle meets the minimum Direct Vision Standard (DVS) star rating.

We would also strongly recommend that the CLP commits to all large construction vehicles involved in the proposed development's construction will have a minimum Silver Fleet Operator Recognition Scheme (FORS) accreditation and complies with Construction Logistics and Community Safety (CLOCS) standards.

Overall, TfL requests greater work is undertaken to identify the trip generation impact on TfL infrastructure and appropriately mitigate the unacceptable pedestrian comfort level impacts of the proposed development prior to being supportive of this application. The applicant should also confirm the accessibility of blue badge parking to the site and cycle parking compliance with LCDS guidance.

If you have any queries regarding this response please do not hesitate to contact me.

Many thanks,

Max

Appendix A



Figure 8 Pedestrian Comfort Levels on Footways

Guidance on applying Pedestrian Comfort Levels in different area types

Figure 9 summarises which Pedestrian Comfort Level is suitable for different area types for use in the peak hour, and for the Average Maximum Activity level. This table informs the comments generated by the spreadsheet.

	HIGH STREET		OFFICE AND RETAIL		RESIDENTIAL		TOURIST ATTRACTION		TRANSPORT INTERCHANGE	
	Peak	Ave of Max	Peak	Ave of Max	Peak	Ave of Max	Peak	Ave of Max	Peak	Ave of Max
A	COMFORTABLE		COMFORTABLE		COMFORTABLE		COMFORTABLE		COMFORTABLE	
B+	ACCEPTABLE		ACCEPTABLE		ACCEPTABLE		ACCEPTABLE		ACCEPTABLE	
B										
B-										
C+	UNACCEPTABLE/ UNCOMFORTABLE		ACCEPTABLE		AT RISK	AT RISK	UNACCEPTABLE/ UNCOMFORTABLE		ACCEPTABLE	
C-			AT RISK	AT RISK	ACCEPTABLE					
D			AT RISK	AT RISK	UNACCEPTABLE/ UNCOMFORTABLE					
E			AT RISK	AT RISK	UNACCEPTABLE/ UNCOMFORTABLE					
	Peak and Average of Maximum Activity levels have similar guidance as people visiting retail areas stated they were particularly sensitive to crowding.		The "at risk" level is set at a lower PCL during the Average of Maximum Activity than peak flows. This is because of the greater number of single travellers and the short duration of maximum activity.		The "at risk" level is set at a lower PCL than peak flows in Residential Areas to reflect the short time this is likely to occur. A site visit to Residential sites is particularly important to check if there is school activity or a bus stand in the area.		Peak and Average of Maximum Activity levels have similar guidance as people visiting tourist areas are likely to be particularly sensitive to crowding		The "at risk" level is set at a lower PCL during the Average of Maximum Activity than peak flows. This is because of the greater number of single travellers and the short duration of maximum activity.	

Figure 9 Guidance for different area types

FROM THE MASTER
TELEPHONE:



DRAPERS' HALL
LONDON EC2N 2DQ

Mr Tim Orchard

Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

24 February 2020

Dear Ms Evans

Ref: 19/01307/FULEIA

I am writing in response to your request for comments on the proposed redevelopment at Clothworkers' Hall, since the Drapers' Company has an interest in the area, as it is the freeholder of 70 Mark Lane, an office building adjacent to the site at 50 Fenchurch Street.

Having considered the scheme in detail, we are in favour of it being granted permission to proceed. We feel that the proposed scheme improves and enhances the area by:

- providing additional public spaces in the shape of roof and 'winter' gardens;
- improving the accessibility to the Tower of All Hallows Staining and Lambe's Chapel Crypt;
- creating a considerably improved Livery Hall for the Clothworkers' Company;
- generating additional floorspace for 6,500 people to work in what is a vibrant part of the insurance district; and
- raising the quality of the built environment by replacing some very average architecture with a coherent and pleasing design; and

In summary, we feel that this sort of scheme perfectly chimes with what is required in the City at this time, as it blends the modern with the traditional whilst enabling the provision of more commercial space in a balance manner with an enhanced public realm.

Yours sincerely

Mr Tim Orchard
Master



Development Division
Attn. Director of the Built Environment
Guildhall
EC2P 2EJ LONDON
UK

Amsterdam, 28 February 2020

Saxon Land B.V.
De Entree 91
1101 BH Amsterdam
The Netherlands

**Subject: Planning Application Ref. 19/01307/FULEIA
Site Bounded By Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane,
London EC3M 3JY**

Dear Sirs,

We refer to the above planning application and wish to register our strong objection to the proposed development. We have fully reviewed the planning application documents that have been submitted.

In broad terms, we understand that the proposed development comprises the demolition of the existing buildings at 41-43 Mincing Lane, 40-534 Fenchurch Street, the former Church Hall and Clothworker's Hall ("the Site") and the redevelopment of the Site for a 35 storey building (165.1m AOD). As such, we understand that the proposed development includes the redevelopment of the Site for a "tall building", as defined in planning policy.

This objection is submitted on behalf of Saxon Land B.V., long leaseholder of the building known as Fen Court at 120 Fenchurch Street and 10 Fenchurch Avenue. The roof garden at 120 Fenchurch Street is on the 15th floor of the building (known as "The Garden at 120")

The roof garden at 120 Fenchurch Street is on the 15th floor of the building and is a fully accessible garden open to the public and provides a valuable amenity space for office workers, members of the public and visitors to The City.

The reasons for our objection are based on the following issues which raise significant concerns, which are fully explained below:

- The wholly inappropriate location for a tall building of the height and scale proposed;
- The significant impact the proposed development will cause on the amenity and enjoyment of a significant area of public open space.

Site Location - "The Eastern Cluster"

The planning application refers to the location of the Site as being on the "*southern perimeter of the City Cluster*" (para 2.19 of the Planning Statement). The term "*City Cluster*" does not appear anywhere in the adopted Local Plan (2015). As such, the applicant's justification for a tall building within the "City Cluster", as a defined term within the adopted Local Plan is wholly misguided.

As referred to in para 7.98 of the Planning Statement, the "*Eastern Cluster*" under Policy CS7 of the adopted Local Plan is identified as a location where tall buildings form a distinctive element in the skyline. The Local Plan advises that the 'Eastern Cluster' "*has the highest density of business activity in the City and contains a cluster of tall buildings. New buildings are expected to be clustered in this area.*" (P.22). The key part of the policy being that tall buildings are expected to be located "*in this area*". However, the Site is located **outside** of the defined 'Eastern Cluster Area' in the adopted Local Plan and the Draft City Plan 2036. The fact that the Site is located outside of the tall building policy area is acknowledged in the planning application by the assertion that the Site is on the "*perimeter*" – therefore outside of where tall buildings should be located.

The planning application also makes reference to Policy S21 in the Draft Local Plan which relates to the 'City Cluster'. The policy advises that this is a 'City Cluster Key Area of Change' that will deliver "*tall buildings on appropriate sites*". However, similar to adopted Local Plan policy, the proposed development is for a tall building on a Site that is clearly located **outside** of this policy area for tall buildings. Therefore, this is not an appropriate site or a suitable location for a tall building and there is no policy justification in adopted or emerging Local Plan policy for the height and scale of development proposed on the Site.

If the Site was considered appropriate for a tall building, the Draft Local Plan would propose to expand the adopted 'Eastern Cluster Area' to include sites such as the application Site on the "*perimeter*" to within the boundary of the 'City Cluster'. The Draft Local Plan does not do so because the perimeter of the 'Eastern Cluster' is not considered an acceptable location for a tall building. The principle for the siting of tall buildings should only be within the identified 'City Cluster'.

Therefore, given the Site is located outside of the defined 'Eastern Cluster Area' and the emerging 'City Cluster' policy area, the principle of a tall building on this Site outside of this location is not justified and is considered to be unacceptable.

Tall Buildings Policy

Core Strategic Policy CS14: Tall Buildings seeks to allow tall buildings in suitable locations and to ensure that they take account of the character of their surroundings. An assessment of the relevant criteria of the Policy is set out below:

"1. *Permitting tall buildings on suitable sites within the City's Eastern Cluster.*

As set out above, the Site is not within the City's Eastern Cluster. This is not a suitable site for a tall building.

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.*

It is recognised that the Site is not located within the St. Paul's Heights area, the Monument views restriction or any LVMF Protected Vistas as defined on the Policies Map. However, the Site is located to the north-west of the Tower of London, which is a World Heritage Site containing a number of listed buildings. The Site lies within close proximity to a number of conservation areas, such as Fenchurch Street Station, Lloyds Avenue, Trinity Square, Eastcheap and Leadenhall Market. There are also two listed buildings on the Site – the Grade I listed 'Tower of All Hallows Staining' and the Grade II listed 'Lambe's Chapel Crypt'.

Therefore, the Site is a very sensitive location for new development, in terms of the effect on the setting of listed buildings and conservation areas.

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.*** [our emphasis]

Notwithstanding the above, due to the location of the Site and the scale of the proposed development, the proposals will appear in a number of LVMF designated views, as set out in Table 7.1 of the London Plan.

The views included within Volume 2 of the accompanying Environmental Statement clearly show that in townscape terms, the proposed development will have an adverse impact on the City skyline and be detrimental to the setting of the Tower of London World Heritage Site.

The townscape views demonstrate the significant harm to the setting of the World Heritage Site, both as a result of views to and from the Tower, which are particularly evident from the main entrance and public Wall Walks. The proximity of the Site to the Tower of London World Heritage Site and the scale of development proposed would appear overly dominant and highly intrusive in many views from the Tower of London. Development on this Site of the height and scale proposed would encroach into a space currently separating the Tower of London from the eastern side of the 'City Cluster'. Therefore, due to the location of the Site and the scale of development proposed, it would clearly cause significant adverse harm to the setting of the Tower of London World Heritage Site.

In terms of impact on amenity, the proposed development does not have due regard to or has assessed the overshadowing of the Garden at 120 Fenchurch Street, in accordance with the BRE recommendations. Further detail on this particular issue is discussed later.

As can be seen above, the proposed development would therefore be contrary to Policy CS14 of the Local Plan.

The Draft Local Plan includes Policy S12 'Tall Buildings' which, inter alia, advises that:

"2. Tall buildings of world class architecture and sustainable and accessible design will be permitted on suitable sites, having regard to:

- the potential effect on the City skyline, the wider London skyline and historic skyline features;*
- the character and amenity of their surroundings, including the relationship with existing tall buildings;*
- the significance of heritage assets and their settings;*
- the provision of a high-quality public realm at street level; and the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.*

*3. Where tall buildings are acceptable in principle, **their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building.** Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.* [our emphasis]

6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map."

Therefore, the comments made in respect of the unacceptability of the proposed development in respect of adopted Local Plan policy on tall buildings is also valid for the above policy in the draft Local Plan. As such, the proposed development is also contrary to Policy S12 of the draft Local Plan.

The draft Local Plan, under criterion 3 above, also refers to the impact of tall buildings on the surrounding environment – including daylight and sunlight impacts within nearby buildings and the public realm. The tone of this criterion is proposed to be strengthened from that set out in the adopted Local Plan. As previously set out, notwithstanding the principle of a tall building in this location is not accepted, the particular issue of amenity to public realm is of key importance and is discussed below.

Overshadowing of Public Realm and Amenity Space

The Garden at 120 Fenchurch Street is a new, award winning, significant area of high quality public realm and open space within The City. The area provides a 360 degree viewing platform of London and is free to visit, with no booking required. The space is extremely popular to visitors who comment positively about the view from this public space in the roof garden.

In 2019, the garden welcomed 219 520 visitors , averaging 915 per day.

The Garden is open during the following times:

- Summer: 1st April – 30th September (Monday to Friday 10:00hrs – 21:00hrs)
- Winter Times: 1st October – 31st March (Monday to Friday 10:00hrs – 18:30hrs)

The view from the roof garden will be destroyed by the proposed development, which is a key reason for visiting members of the public to use the space. As such, the proposed development will totally undermine the function of this space as a viewing gallery towards the rest of London. In addition there will also be significant overshadowing of the roof garden during opening times.

A true assessment of the impact the proposed development will have on the amenity of the Roof Garden can be seen on the simulation.

<https://vimeo.com/384544511>

We note from the planning application that the overshadowing of the Garden at 120 Fenchurch Street has been assessed. The application states that *“there would be no change as a result of the Proposed Development to the roof terrace of 120 Fenchurch Street...”* (para 7.184 of the Planning Statement).

Paragraph 7.185 of the Planning Statement advises that, *“In terms of transient overshadowing, although the Proposed Development will cast a much larger shadow than the existing development, this will cause minimal impacts during the year. Additional shadowing sweeping over the public amenity spaces would occur between 10:00am and 2:00pm in March and September. Overall, the effect of the Proposed Development in terms of overshadowing to the public amenity spaces throughout the year is considered to be minor adverse and therefore not significant...”*

The BRE recommends that a space should receive 2 hours of direct light to 50% of the area on the 21st March. Where there are changes as a result of a new development, if these exceed 20%, it is likely to be noticeable. The BRE also notes that *“if a particular space is only used at certain times of day or year (e.g. café, outdoor performance area or school playground) it is instructive to plot shadows for those specific times.”* Therefore, in this case, given the roof garden is a public space that is only open during certain hours of the day, an assessment should be carried out on the overshadowing of the space during the hours of operation.

An assessment of the overshadowing of the roof garden during opening hours has not been carried out in the planning application. It is therefore requested this assessment is undertaken and the impact is considered as part of the determination of the planning application, in accordance with the BRE recommendations.

Overshadowing Analysis

Given the lack of an assessment in the planning application, an assessment to inform our concerns has been undertaken.

As shown on the enclosed overshadowing diagrams, an assessment has been carried out in respect of the overshadowing of the roof garden. The BRE analysis during opening hours shows that there would be a c50% change in the area that received direct sunlight. Therefore, as a result of the proposed development, BRE compliance in respect of the overshadowing of the roof garden would not be met.

Summary

In summary, we strongly object to the redevelopment of the Site for a 35 storey building, for the reasons set out above and request that planning permission is refused. The proposed development is contrary to policies CS7 and CS14 of the adopted Local Plan and policies S21 and S12 of the draft Local Plan.

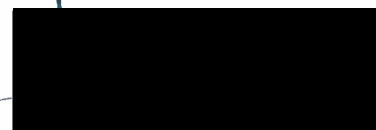
The proposed development of a tall building on this Site is wholly inappropriate in terms of its location – outside of the identified policy area for tall buildings and would result in significant harm to the setting of the Tower of London World Heritage Site. There is no justification in policy terms for the siting of a building of the height and scale proposed in this location.

Furthermore, the planning application has failed to assess the impact of overshadowing during opening hours on the Garden at 120 Fenchurch Street. Taking into account the BRE guidance, as demonstrated, the proposed development will cause significant overshadowing to the Roof Garden at 120 Fenchurch Street with a c50% change in the area that will receive direct during the opening hours. This will be in breach of the BRE guidance and will cause a significant detrimental impact to the amenity of this public amenity space.

We trust that the above comments are taken into full consideration in the determination of the planning application.

Yours sincerely

Saxon Land B.V.



G.K. Nolles
Director



R.N. Drielinger
COO and General Counsel



Historic England

Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
London
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: L01172051

28 February 2020

Dear Ms Evans

Arrangements for Handling Heritage Applications Direction 2015

LAMBE'S CHAPEL CRYPT MARK LANE LONDON EC3R 7LQ Application No. 19/01277/LBC

Thank you for your letter of 4 February 2020 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England has commented separately on the associated planning application for the development proposals on the site. This advice relates to the proposed dismantling and relocation of Lambe's Chapel Crypt. Historic England is supportive of this element of the scheme, which would see a scholarly reconstruction of the listed building in a location better suited to its interpretation and the provision of public access.

Lambe's Chapel Crypt originally formed part of a chapel belonging to the Cripplegate Hermitage, which was constructed in the mid-twelfth century against the inner side of the London Wall on Monkwell Street. The chapel was purchased by William Lambe, Master of the Clothworkers Company 1569-70, who left it to the company upon his death in 1580. The chapel was demolished in the early nineteenth century, and the Clothworkers Company reconstructed part of the crypt at its present location adjoining the tower of All Hallows Staining in 1872-4. Detailed research and investigation suggests that this reconstruction was not entirely faithful and was not carried out particularly successfully. Only half of the crypt was rebuilt and original fabric is somewhat limited, with extensive historic replacement stonework and modern fabric forming part of the existing structure. It is Grade II listed and has strong architectural and historic interest as the remains of a Norman crypt, albeit fragmentary and no longer in-situ.

The proposed dismantling, relocation and reconstruction is considered to be well



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justified, and enables a number of benefits. Its current location makes a limited contribution to significance and this is largely drawn from its long association with the Clothworkers Company, which would be maintained as the crypt would remain on the site. The connection with the tower of All Hallows Staining may be considered misleading in implying an earlier relationship between the two. The principle of relocating the crypt is therefore considered acceptable. In doing so, the inaccuracies and inappropriate materials of the present reconstruction can be rectified; a more coherent re-presentation of the original crypt with inclusive public access would also be achieved.

Should you be minded to grant consent, we recommend that you secure the final specification and schedule of works for the dismantling and reconstruction of the crypt by condition, in consultation your specialist conservation adviser.

We recommend that you also contact Historic England's listing team following the reconstruction of the crypt, as the List entry will likely need to be updated. Aidan Misselbrook (Aidan.Misselbrook@HistoricEngland.org.uk) in the listing team would be happy to advise you on this.

Recommendation

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

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

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

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater->



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Historic England

[london-archaeology-advisory-service/our-advice/](https://www.historicengland.org.uk/london-archaeology-advisory-service/our-advice/)

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas

E-mail: Alexander.Bowring@historicengland.org.uk

cc

Aidan Misselbrook, Historic England

Kathryn Stubbs, City of London



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Historic England

Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
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London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: L01169671

28 February 2020

Dear Ms Evans

Arrangements for Handling Heritage Applications Direction 2015

TOWER OF ALL HALLOWS STAINING MARK LANE LONDON EC3M 3JY Application No. 19/01283/LBC

Thank you for your letter of 30 January 2020 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England has commented separately on the associated planning application for the development proposals on the site. This advice relates to the proposed works to the tower of All Hallows Staining. Historic England is supportive of this element of the scheme, which should enable the long-term conservation of the listed building, including the enhancement of its significance.

The Church of All Hallows Staining was founded in the late-twelfth century and lasted until the parish was combined with that of St Olave Hart Street in c.1870. At this point the church was demolished, leaving only the tower, which is known to contain fabric dating from at least the early-fourteenth century. It is Grade I listed, reflecting its high historic and architectural interest. In the 1950s various works were undertaken to the tower, including the raising of the levels of the churchyard, infilling of openings and the use of unsympathetic materials. These works have had a detrimental impact on both significance and the condition of the historic fabric over time.

Historic England welcomes the proposed conservation and repair works, which are considered to be well-informed and should prevent further loss or decay of historic fabric. Important architectural features and detailing would be better revealed following the removal of later fabric, such as the infill to the Reigate stone arches and heavy masonry shelter coats. The reduction in level of the churchyard as part of a new public realm scheme should also alleviate the damp issues causing stonework to deteriorate,



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and enable a better appreciation of the listed building in a more sympathetic immediate setting.

Should you be minded to grant consent, we recommend that you secure the detailed specification for materials and methodologies for the conservation and repairs works (which should correspond with the submitted scope of proposed conservation works), by condition. We note that there is an increasingly pressing need for the identified essential conservation and repair works, and it has been recommended that the phasing of the wider development should enable them to be undertaken at the earliest opportunity.

The development also involves the underpinning of the listed church tower, and given its multi-phase construction history, and the potentially fragile nature of medieval structures, we have already recommended that you secure the final engineering details and the sequence of activities related to the underpinning for approval, prior to this part of the scheme being implemented. We encourage you to consider attaching such a condition to the listed building consent in addition to the planning permission.

Recommendation

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

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

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

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater->



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

[london-archaeology-advisory-service/our-advice/](#)

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas

E-mail: Alexander.Bowring@historicengland.org.uk

cc

Kathryn Stubbs, City of London



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MERCHANT TAYLORS' COMPANY

PLN
09 MAR 2020

FROM THE MASTER

Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
London EC2P 2EJ

March 3rd 2020

Dear Ms Evans

ref 19/01307/FULEIA – 50 FENCHURCH STREET

I am writing in support of the above planning application .

On urban planning grounds , the proposed scheme will be a great improvement to the present street scene , which is characterised by the undistinguished current buildings surrounding and masking the wonderful mediaeval Tower of All Hallows Staining .

The CGIs show an attractive and accessible plaza showcasing the ancient Tower , and giving the public the ability to visit both the new roof gardens and the ancient Lambe's chapel crypt .

The office block design is to be applauded for satisfying many important sustainability objectives , and will fit in unobtrusively into the eastern cluster of tall buildings .

Replacement of a 62 year old building will benefit the City's commercial offering ; and though I think its outside planning considerations , the fact that the additional office space created by the proposed scheme will allow capital to be unlocked to help endow the great charitable enterprise that is the Clothworkers Foundation , is an added benefit for both The City , and London as a whole.

Yours sincerely ,

Nicholas Hunter Jones

J

CARPENTERS' COMPANY

ALL LETTERS TO BE ADDRESSED TO
"THE CLERK"



FROM THE MASTER

CARPENTERS' HALL
THROGMORTON AVENUE,
LONDON, EC2N 2JJ

PLN
10 MAR 2020

Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

6 March 2020

Clothworkers' Development Proposal

Don Mc Evans

I write as the Master of a Livery Company, the Worshipful Company of Carpenters, with an enduring interest in and commitment to the development of the City of London over many centuries – and I write in order to express our strong support for the planning application submitted by the Clothworkers' Company for their development of 50 Fenchurch Street.

The Clothworkers' Company is renowned for its enduring commitment to charitable endeavours and we have no doubt that their development will add significantly to both the aesthetics and public benefit of the City. From our perspective, the main benefits provided by their scheme are as follows:

- Significant and exciting new public spaces – a roof garden designed to complement the garden at 10 Fen Court, a double height high level winter garden and extensive ground floor public realm. This totals over 3,000 sq m of space, representing a 30 fold increase over existing public space in a part of the City where there is limited public space
- - Heritage assets – improving two currently inaccessible listed buildings on site and the opening of these to the public.

CARPENTERS' COMPANY

**ALL LETTERS TO BE ADDRESSED TO
"THE CLERK"**



**CARPENTERS' HALL
THROGMORTON AVENUE,
LONDON, EC2N 2JJ**

FROM THE MASTER

- - Livery Hall – a fit for purpose new Livery Hall and associated accommodation, remaining on the site and being the Clothworkers' seventh Hall in this location.
- - Architecture – high quality architecture (by Eric Parry) providing a substantial improvement on the existing office buildings
- - Urban greening and Sustainability - pioneering and extensive urban greening, designed to meet the stringent sustainability targets for new buildings
- - Employment - new office building accommodating 6,500 people helping to meet the City's targets for new space
- - Charitable – the overriding rationale for the scheme is that it will allow capital to be unlocked from these assets to help endow the Clothworkers' Foundation for generations.

We very much hope that you will give consent to this ambitious and admirable scheme.

Yours sincerely



THE
MERCERS'
COMPANY



Ms Catherine Evans
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

6 March 2020

Dear Ms Evans,

Ref: 19/01307/FULEIA

Having reviewed the Development Proposal of the Clothworkers' Company regarding their proposed new development I would like to offer the Company's support and set out our views below.

- The proposal boasts exciting new public spaces including a roof garden designed to complement the garden at 10 Fen Court, a double height high level winter garden and extensive ground floor public realm. This totals over 3,000 sq m of space, representing a 30 fold increase over existing public space in a part of the City where there is limited public space.
- It supports City heritage assets – improving two currently inaccessible listed buildings on site and the opening of these to the public.
- It will provide a fit for purpose new Livery Hall for the Clothworkers' Company enabling it to remain on site from its charter date of 1528.
- The high quality architecture (by Eric Parry) provides a substantial improvement on the existing office buildings and is fitting for the surrounding area.
- It pioneers extensive urban greening, and meets the sustainability targets for new buildings.
- The new office building will accommodate 6,500 people thereby helping to meet the City's targets for new space.
- It will allow capital to be unlocked to help endow the Clothworkers' Foundation and their important work.

Yours sincerely,

Mark Aspinall
Master Mercer