

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	16 February 2021
<b>Subject:</b> 70 Gracechurch Street London EC3V 0HR Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.	<b>Public</b>
<b>Ward:</b> Langbourn	<b>For Decision</b>
<b>Registered No:</b> 20/00816/FULEIA	<b>Registered on:</b> 13 October 2020
<b>Conservation Area:</b>	<b>Listed Building:</b> NO

### Summary

Planning permission is sought for: Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

An Environmental Statement accompanies the scheme.

The scheme is of a high-quality design and features a number of attractive features including greening and vehicle lifts which integrate into the landscaping. It provides a significant increase in office floorspace meeting one of the primary objectives of the City's Local plan and London plan policies. It results in some loss of retail within a Principal Shopping Centre, but this is considered acceptable when taking into account the nature of the development and the other benefits of the scheme, such as new pedestrian routes linking Fenchurch Street to Leadenhall Market.

The building would be designed to high sustainability standards, incorporating a significant element of climate resilience, energy efficiency, targeting BREEAM 'Outstanding' and adopting Circular Economy Principles and

integrated urban greening.

The scheme delivers an increased and significant enhancement of public realm through the introduction of a new north-south public route through the building connecting Fenchurch Street to the network of passageways and lanes connecting Leadenhall Market and the introduction of a large permeable accessible space within the site, fronting Fenchurch Street and Lime Street, open to the public 24 hours a day.

The scheme provides a varied range of retail spaces at ground floor and lower ground mezzanine, including the retail forum hall fronting Gracechurch Street and a retail pop up area within the new permeable accessible space.

The scheme provides a free public viewing gallery at Levels 29 and 30, totalling around 1,125sq.m of floorspace. The public viewing gallery will offer views across London to the north, south and west. The space would be managed by the Applicant and will be made available for the benefit of City workers, residents and visitors.

Over 72,000sq.m of flexible and sustainable Grade A office floorspace suitable for circa 4,300 City workers would be provided as part of the scheme. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers, from incubator spaces, SMEs to multinational companies.

1002 long term bicycle spaces would be provided with associated shower and locker facilities. The number of short term spaces at 28 would not be compliant with requirements but need to be balanced against the other public realm benefits. Save for this shortfall, the scheme is in compliance with Local Plan Policy 16.3 and London Plan policy 6.9. The scheme includes an innovative solution of two service vehicle lifts within the building, the lids of which during the daytime would form part of the publicly accessible area fronting Fenchurch Street and Lime Street.

Representations objecting to the proposals have been received from Historic England on the ground of harm to significance arising as result of impact on views from within the Inner Ward and increasing the amount of modern development competing with the historic buildings visible within the Tower of London's setting. Further concerns relate to: The impact of the proposals when viewed upstream at Waterloo Bridge and the effect of daylighting of Leadenhall Market and any loss of light as a result of this scheme could harm the special interest of the listed building and have a negative and consequent effect on its future sustainability. Historic England further raise concerns over the quality of the design as part of the Cluster, with particular reference to Leadenhall Market.

A letter of objection has been received from the owner of nearby 60 Gracechurch Street covering a number of grounds of objection including: harmful impact on heritage assets and the townscape, daylight, sunlight, impact on the development opportunities.

3 further letters of objection have been received from 3 residents of 2-4 Bulls Head Passage, objecting on the grounds of loss of daylight and sunlight to these properties.

The proposal would preserve pan-London LVMF and local strategic views in accordance with London Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, City Plan 2036 Policy S13 and the draft Publication London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. Following rigorous assessment, it is concluded that the proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

The proposal would preserve the special interest and setting of The Monument, Tower Bridge, Leadenhall Market, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street and 7-8 Philpot Lane. The significance of the Bank, Leadenhall Market and Eastcheap Conservation Area would be unharmed preserving and enhancing the character and appearance of the area.

The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.

Planning of the City Cluster has sought to safeguard the immediate setting of the Tower of London in accordance with guidance and to step the height of development away from the Tower so that it rises to a peak some way from the Tower. This scheme is located on the western side of the eastern cluster and it is considered that it sits comfortably within the Eastern Cluster policy area as well as the City Cluster policy area of the replacement Local Plan and its Renewal Opportunity Area.

In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City the heritage, design, tall buildings and public realm policies, but fail to accord with the retail policies. It is the view of officers that, as a matter of planning judgement, that as, in particular, the proposals make will make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, heritage, tall buildings and public realm policies, they accord with the development plan when considered as a whole.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up to date development plan without delay.

Paragraph 131 of the NPPF sets out that great weight should be given to outstanding and innovative designs which help raise the standard of design more generally in the area.

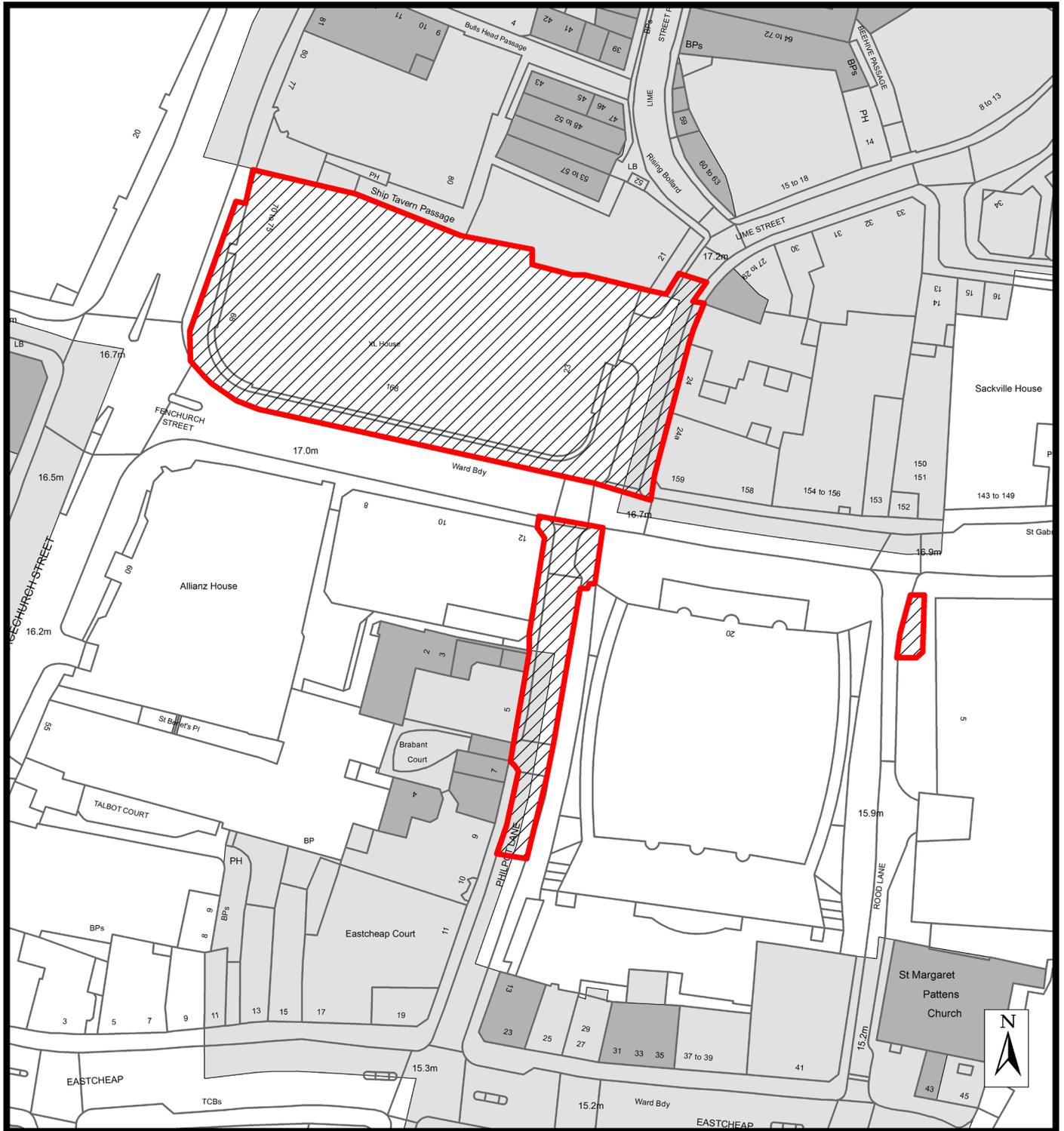
As set out in paragraph 193 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). The world heritage site status and its Grade I listing places the Tower of London at the very highest level and as a result great weight should be given to the asset's conservation.

Taking all material matters into consideration, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

## **Recommendation**

- (1) That the Chief Planning Officer be authorised to grant planning permission for the above proposal in accordance with the details set out in the attached schedule, subject to:
  - a) The Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
  - b) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highways Act 1980 in respect of those matters set out in the report, the decision notice not be issued until the Section 106 obligations have been executed;
- (2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.
- (3) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

# Site Location Plan



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ADDRESS:  
70 Gracechurch Street, London EC3V 0HR

CASE No.  
20/00816/FULEIA

-  **SITE LOCATION**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**
-  **CITY OF LONDON BOUNDARY**





Image 1: View of existing building looking east, at the junction of Gracechurch Street, Lombard Street and Fenchurch Street

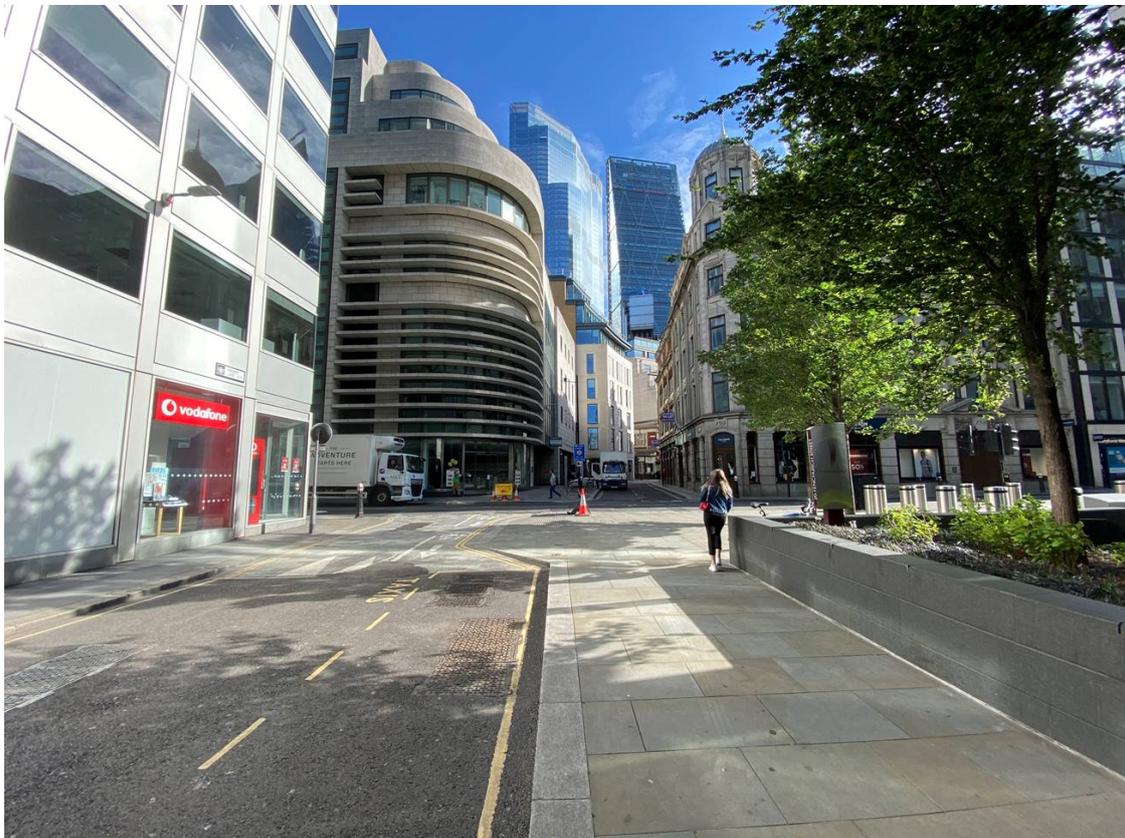
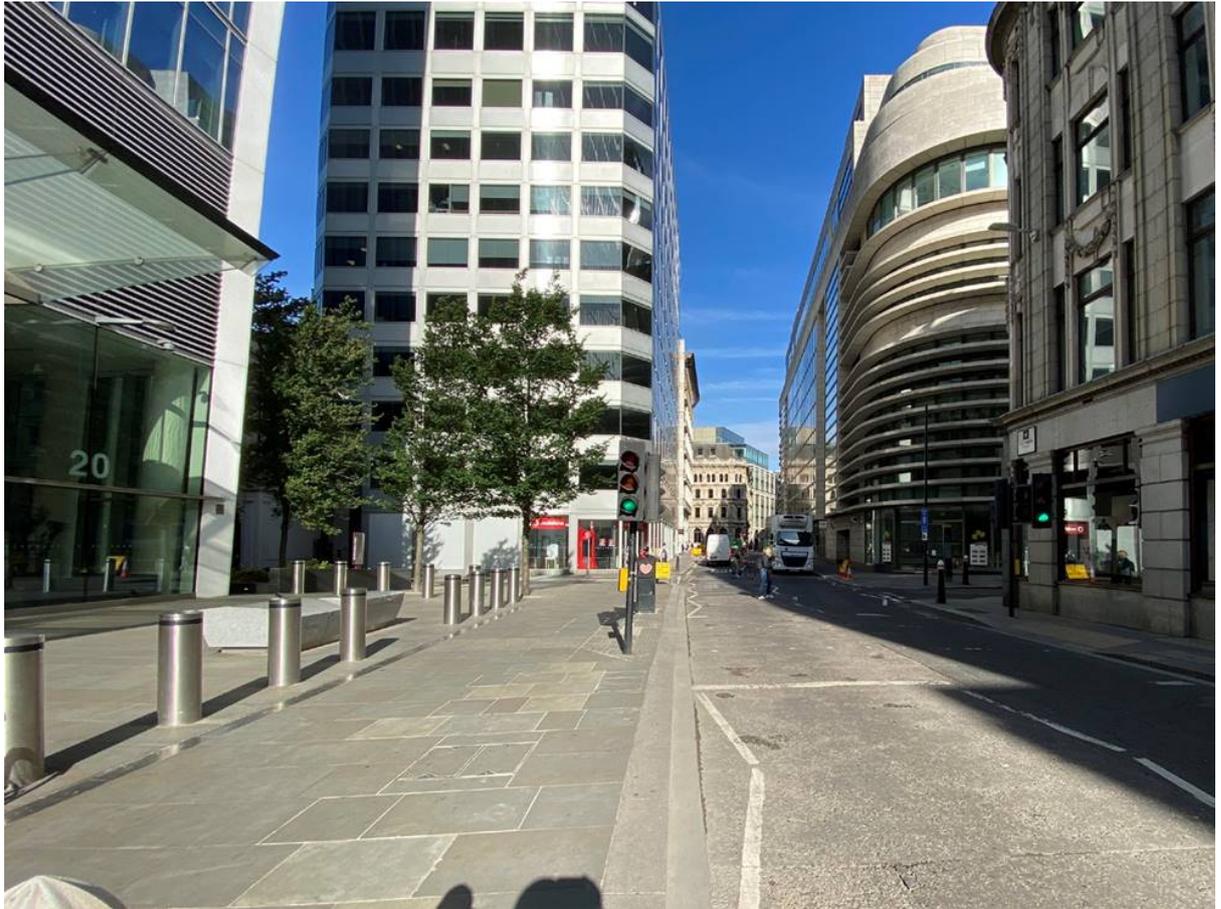


Image 2: View of existing building, looking north from Philpot Lane



View 3: View of existing building, looking west from Fenchurch Street



Image 4: View of existing building at Ship Taverns Passage

## **Main Report**

### **Environmental Statement**

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a mean of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
  - a) To examine the environmental information
  - b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
  - c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
  - d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.

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

### **Site and surroundings**

8. The site occupies a prominent corner plot and is located towards the middle of Gracechurch Street, on the eastern side. It is bound by Gracechurch Street to the west, Ship Tavern Passage to the north, Lime Street to the east and Fenchurch Street to the south.
9. The red line boundary of the proposed development includes integrated public realm proposals at the interface with the public highway which adjoins the main site, where public realm improvements are proposed. The red line includes:
  1. Land in Lime Street where highway improvements and tree planting works are proposed;
  2. Land in Philpot Lane where highway improvement works are proposed; and
  3. Land off Rood Lane where tree planting is proposed.
10. The existing building was completed in 2001. It is 8 storeys high with 3 basements and comprises 17,467 sq.m (gia) offices, 9,274 sq.m (gia) retail and 1,315 sq.m ancillary floorspace. (Total 28,056 sq.m).
11. Residential properties at 4 Bulls Head Passage lie to the north and at 14 Lime Street to the north east of the site.
12. The site is immediately abutted to the north and east by the Leadenhall Market Conservation Area. Land to the east side of Lime Street, where highways and public realm improvement works are proposed, is in the Leadenhall Market Conservation Area and land to the west side of Philpot Lane, where further highways and public realm works are proposed, is in the Eastcheap Conservation Area.
13. There are a number of listed buildings within the immediate vicinity of the site. These include:
  - Leadenhall Market (Grade II\*)
  - 81-82 Gracechurch Street (Grade II)
  - The Ship Tavern, 27 Lime Street (Grade II)
  - 39-40 Lombard Street (Grade II)
  - 38 Lombard Street (Grade II)
  - 7-9 Gracechurch Street (Grade II)
  - Custom House (Grade I)
  - Billingsgate Market (Grade II)
  - Adelaide House (Grade II)
  - Cannon Street Station Towers (Grade II)

Other listed buildings in close proximity include: The Tower of London (World Heritage Site, Scheduled Monument and listed buildings), Tower Bridge (Grade I), The Monument (Scheduled Monument and Grade I), Lloyd's Building (Grade I), 24-28 Lombard Street (Grade II), 60 Lombard Street (Grade II), St Edmund's Church (Grade I), 27-28 Clement's Lane (Grade II) and St Clement's Church (Grade I) all in the Bank Conservation Area; 37-39 Lime Street (Grade II) in the Leadenhall Market Conservation Area and 2-3 (Grade II) & 7-8 (Grade II\*) Philpot Lane and 4 Brabant Court (Grade II) in the Eastcheap Conservation Area.

14. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the highway authority.

### **Proposals**

15. Planning permission is sought for:
  - The demolition of all existing buildings and erection of a new building to provide a Class E office-led tower of ground plus 33 storeys with flexible retail use (mix of shops and restaurants) (Class E), drinking establishments (Sui Generis) and hot food take-away (Sui Generis) at ground level and a public viewing gallery (Sui Generis) at 29th and 30th level.
16. The scheme provides 76,380 sq.m gea floorspace comprising:
  - 72,992 sq.m of office floorspace;
  - 1,823 sq.m of flexible retail; and
  - 1,566 sq.m of public access space including public viewing gallery.
17. The maximum height of the proposed development would be 154.73m AOD. The proposed development includes a base podium building and tower split into three vertical forms. The base is stepped in height, the eastern part would be ground plus three storeys, the central part would be ground plus four storeys and the western part would be ground plus five storeys. The podium would be solid form, expressed in masonry with curved facades and punctuated with glazing and terraces accommodating plating between the podium forms. The base includes a passageway set between the west and central forms, providing a new public route through connecting Fenchurch Street to Ship Tavern Passage. The tower that sits above the podium presents itself as three distinct forms with terraces between each form. The western tower block reaches a height of 139.52m AOD (30 storeys above ground), the central tower block reaches a height of 147.12m AOD (32 storeys above ground) and the eastern tower block reaches a height of 154.73m AOD (33 storeys above ground). The form is designed to be sculpted, with the artist Brancusi providing inspiration for the curved forms. The tower elements have metal fins and shelves with terracotta spandrel inserts.
18. The scheme provides a significant increase in office floorspace and a reduction in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses, with flexible Grade A office floorspace above.

19. The main entrances would be from Gracechurch Street and Fenchurch Street with escalators ascending to the 2nd and 3rd floor office lobby. The south east corner of the proposed building is open-sided, providing a large area of outdoor publicly accessible space in daytime hours when flatbed servicing lifts are not in use. This enables pop-up retail uses in this area, fronting Lime Street and providing further activation of this space.
20. Access to the public viewing gallery at levels 29 and 30 would be provided from ground floor level off Ships Tavern Passage, with dedicated lifts, supported by a security check area. The viewing gallery is located to offer views across London to the north, south and west. The public viewing gallery would be managed by the applicant and made available to City workers, residents and visitors.
21. When exiting the lifts from the public viewing gallery you would exit via the new north to south pedestrian public route proposed in the building, connecting Fenchurch Street to Ship Tavern Passage. The north to south passageway would connect to the network of passageways providing access to Leadenhall Market.
22. The scheme would provide a range of retail spaces at ground floor and lower ground mezzanine, including the retail forum hall fronting Gracechurch Street. There would be further space for a retail pop up area at ground floor level.
23. The proposed scheme would incorporate extensive urban greening, including large planted terraces at podium and roof levels, balcony planters located on alternate floors between tower forms to the north and south elevations, the planting of trees on Lime Street and Rood Lane and a green wall to Ship Tavern Passage northern elevation.
24. A tenant roof garden is proposed at the rooftop on two of the three tower roofs. The space will be landscaped and be demised to the office occupiers as amenity space. The space would offer amenity space, supporting a healthy, varied and engaging workplace. The perimeter of the terrace would have 2m high upstand balustrades and a landscaped area.
25. Off street servicing would take place from the basement, accessed via Lime Street out of hours by two flatbed vehicle lifts which during the daytime would form part of the publicly accessible space within the site. This innovative solution removes any dead frontage and ground floor space often experienced with service yard entrances.
26. The development would have two basement levels and the existing basement would be reused insofar as possible. Basement 1 accommodates the vehicle loading and unloading facilities, with a turntable allowing vehicles to enter the lifts in a forward gear via Lime Street and would accommodate some plant space, ancillary spaces for waste storage, mail, security offices and retail and offices storage space. Basement 2 accommodates space for plant and storage.

## **Consultations**

27. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders including a traditional public exhibition held between 9th and 10th December 2019 and a second online public consultation held between 17th and 31st August 2020.
28. The initial public exhibition was held in the Gallery of the Brand Exchange (3 Birchin Lane, London EC3V 9BW) and in total 61 people attend the public exhibition across the 2 days, with 16 feedback forms completed. In summary 100% of respondents supported the proposals for redevelopment. Positive comments were received in respect of the buildings design, the form of the building sitting into the cluster and the publicly accessible space.
29. The second online public consultation website received circa 858-page views and 19 feedback forms were completed. In summary 84% of respondents supported the proposals, 11% were neutral and 5% were opposed. Positive comments were received in respect of the sympathetic design and proportions, the buildings environmental credentials, the ground floor plane and the public viewing gallery. More negative comments related to the façade treatment and the preference for a bar with a view rather than a public viewing gallery.
30. Following receipt of the applications they have been advertised on site and in the press and have been consulted upon twice, including under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
31. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

<b>Consultation responses</b>	
Historic England	<p>Historic England has no objection to the principle of replacing the existing building on the site but are concerned about the proposed tall building's wider impact on the significance of London's historic environment, these include: the Tower of London, St Paul's Cathedral and Leadenhall Market. In outline, these concerns are as follows:</p> <ul style="list-style-type: none"><li>• The Tower of London: Historic England identifies a modest degree of additional (less than substantial) harm to significance arising as a result of impact in views from within the Inner Ward and increasing the amount of modern development competing with the</li></ul>

	<p>historic buildings visible within the Tower’s setting. They advise that given the status of the Tower as a World Heritage Site, preserving its significance must be given the greatest possible weight.</p> <ul style="list-style-type: none"> <li>• St Paul’s Cathedral: Historic England express concern about the impact of the proposals when viewed upstream at Waterloo Bridge and state that development should not dominate the Cathedral or compromise its relationship with the clear sky around it.</li> <li>• Leadenhall Market: Concerns are raised that appropriate natural light needs to continue to be provided to the historic Leadenhall Market, and that loss of light as a result of this scheme could harm the special interest of the listed building and have a negative and consequent effect on its future sustainability. Historic England further raise concerns over the quality of the design as part of the Cluster, with particular reference to Leadenhall Market.</li> </ul> <p>Having regard to national, strategic and local policies, while Historic England recognise the opportunities for public benefits, which include the creation of a permeable connection to the market and improved public realm, they state that permission should not be granted unless persuaded that the harm caused by the proposals has been minimised, that there is clear and convincing justification for the proposals and that the harm they would cause would be outweighed by public benefits.</p> <p><b>Response to comments:</b> consideration of the impacts identified in Historic England’s response are contained in the following sections of this report: Heritage – Tower of London World Heritage Site and Designated Heritage Assets.</p>
Historic Royal Palaces	<p>HRP state that the impact of this development on the Outstanding Universal Value of the Tower has been judged as not causing substantial harm and do not object to the application.</p>
The Greater London Authority	<p>The GLA are broadly supportive of the scheme and the principle of a proposed office-led redevelopment within the CAZ and CAZ retail cluster.</p> <p><b>Urban Design:</b> The development layout is strongly</p>

	<p>supported and the height and massing is acceptable in strategic planning terms, noting associated strategic views and heritage considerations.</p> <p><b>Heritage:</b> The GLA raise a number of concerns surrounding the development resulting in a degree of harm to: the Tower of London World Heritage Site, Leadenhall Market and Bank Conservation Areas; the Grade I listed churches of St Edmund, St Mary-le-Bow and St Mary Woolnorth; the Grade I listed Custom House and Billingsgate Market; the Grade II* listed Former Port of London Authority Building; the Grade II listed 81-82 Gracechurch Street, 39-40 Lombard Street, Adelaide House; 1 Cornhill, Cannon Street Station and the Grade I listed St Peter and Vincula Chapel and St Thomas's Tower.</p> <p>GLA officers have requested further assessment of potential impact in relation to Tower Bridge, Billingsgate Market, Custom House, Cannon Street Station and 1 Cornhill to fully assess the impact to heritage assets.</p> <p><b>Climate Change:</b> GLA have requested further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network.</p> <p><b>Flood Risk and Green Infrastructure:</b> The GLA have stated that the approach to flood risk management and surface water drainage complies with London Plan and Publication London Plan policy. They have requested additional information in relation to water efficiency measures.</p> <p><b>Response to comments:</b>  The applicant has responded to the GLA's request for clarifications and additional material in an email addressing points on sustainability and by the submission of a technical note on transport issues and a clarifications report in relation to heritage assets. Officers have considered whether these documents are 'any other information' as defined in Regulation 2(1) of the EIA Regulations, such that there would be a need to advertise it and reconsult on it. 'Any other information' is defined as any other substantive information relating to the environmental statement provided by the applicant. Officers have considered whether the information provided to the GLA is substantive and concluded that it is not.</p> <p>The information provided is considered to clarify and pull together information already included in the Environmental</p>
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	<p>Statement (ES) (including images from the HTVIA). Whilst in some cases the information expands on the ES providing slightly more detail, the information was not considered substantive such that it made any material difference to the assessment on the merits of the scheme or its impacts. In particular the impact of the scheme on the significance and setting of Custom House, Billingsgate Market and Cannon Street Station were assessed thoroughly utilizing view and heritage assessments submitted in the EIA as well as utilizing 3D digital modelling assessments. The City had a thorough understanding of the significance and setting of these heritage assets in carrying out the assessment of the proposal. The information already provided in the ES was considered sufficient by officers given the location and context of these assets, such that officers were able to reach a view as to whether the development would have an adverse impact on the significance and setting of these heritage assets. In this respect the additional information did not make a material difference to the assessment of impact. It is the view of officers that the environmental statement as submitted with the planning application contained all the information required by the EIA Regulations in particular that required by regulation 18 and Schedule 4, including information relating to transport, heritage, townscape and visual impact.</p> <p>The technical note on highway matters sets out minor changes agreed during the assessment process and provides clarifications on the transport assessment. The note further addresses the ability for highway works associated with the development to contribute to making the highway safer and provides clarification on the cycling access routes and how these can be explored as part of the local improvements schemes to be carried out pursuant to the s278 agreements. Clarification is also provided on the methodology that was used in calculating the pedestrian comfort levels. The document further outlines where conditions have been agreed to secure management details in relation to the accessible carparking and pop up retail space. None of this information is considered substantive.</p> <p>In respect of climate change the applicant confirmed to TfL the target non-hazardous demolition and construction waste diversion from landfill for the scheme and compliance with the draft Publication London Plan target for reduction of carbon emissions, along with their commitment to explore the potential for further reductions, which is to be secured by condition. They have also confirmed previously agreed improvements to reducing carbon during the construction process and whole life carbon. This response is considered</p>
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	<p>to provide clarifications to the GLA and is not considered substantive.</p> <p>It is the view of officers that the environmental statement as submitted with the planning application contained all the information required by the EIA Regulations in particular that required by regulation 18 and Schedule 4, including information relating to transport, climate change, heritage, townscape and visual impact.</p> <p>An officer assessment of the points raised and consideration of the impacts identified in The Greater London Authority's response are contained in the following sections of this report: Heritage – Tower of London World Heritage Site and Designated Heritage Assets, Designated Heritage Assets – Impacts on the setting and significance of listed buildings and conservation areas and Sustainability &amp; Energy.</p>
Transport for London	<p>Transport for London confirms that the proposed cycle and car parking is acceptable and broadly complies with Publication London Plan policy.</p> <p>Transport for London have secured contribution towards a Cycle Route Quality Criteria study specified for the cycling link from the site to Cycle Superhighway 3 (CS3). The financial contribution towards this will be J150k.</p> <p>They are supportive of the public realm improvement works to Fenchurch Street and Philpot Lane and of the servicing strategy and loading bay area.</p>
Transport for London Crossrail safeguarding	No comments
Environment Agency	No comments
Lead Local Floor Authority	Conditions are recommended requiring details to ensure that sustainability, flood risk reduction and water runoff rates are improved.
London City Airport	The proposals do not conflict with current safeguarding criteria and so there is no objection.
National Air Traffic Services (NATS)	The proposals do not conflict with current safeguarding criteria and so there is no objection.
London Borough of	The London Borough of Tower Hamlets state that the proposed development raises some concerns about the

Tower Hamlets	<p>degree of visual separation between the eastern cluster and the Tower of London and that the Tower of London World Heritage Site has already reached its limit in terms of visual intrusion and expresses concern about the continuing process of diminishing the expanse of clear sky in backdrop views of the WHS:</p> <ul style="list-style-type: none"> <li>• View 10A – Tower of London: Inner Wall, East of Wakefield Tower: The harm to this view would be minimal.</li> <li>• View 10B – Tower of London: Inner Ward, West of The White Tower 2: The proposed development visually fills the gap between 20 Fenchurch Street and the Chapel bell tower, while its height at the same level as the solid base of the bell tower. The change to this view is considered to cause some harm, as the proposed development would infill the remaining section of sky between 20 Fenchurch Street and the Chapel.</li> <li>• View 10D – Tower of London: Inner Wall, West of Bowyer Tower: When considering 50 Fenchurch Street as part of the cumulative effect on the Tower of London WHS, the proposed development in question appears problematic as it contributes towards an extended wall of tall buildings, some of which appear within an uncomfortable proximity to the Tower of London WHS. As such, the proposal would cause some harm in this view.</li> </ul> <p>They conclude that the proposal would begin to fill the visual gap between 20 Fenchurch Street and the recognised expanse of the City Cluster. They state that the relevant views have been assessed and the impacts identified would cause some, less than substantial harm to the setting and thereby significance of the Tower of London World Heritage Site.</p> <p><b>Response to comments:</b> consideration of the impacts identified in The London Borough of Tower Hamlets response are contained in the following sections of this report: Heritage – Tower of London World Heritage Site and Designated Heritage Assets.</p>
City of Westminster	No comments
London Borough of Hackney	No objection

<b>Letters of representation – 3 letters of objection received from the owners/occupiers of 2 surrounding sites</b>	
Owner of Flat A, 4 Bulls Head Passage	<p>A resident and owner of Flat A, 4 Bulls Head Passage has submitted an objection on behalf of residents of A-C, 4 Bulls Head Passage and objects on the following grounds:</p> <ul style="list-style-type: none"> <li>• Concerned that the proposed development will impact light into the apartments and significantly reduce light later in the day and that it would impact on their quality of life.</li> </ul> <p><b>Response to Comment:</b> Consideration of these impacts are contained in the following sections later in the report: The Building’s Form and relationship to Eastern Cluster; Design Approach; Designated Heritage Assets; Environmental Impact of proposals on surrounding area.</p>
Owner of Flat B, 4 Bulls Head Passage	<p>Objection on the following grounds:</p> <ul style="list-style-type: none"> <li>• Concerned that the proposed development will impact light into the apartment and significantly reduce light later in the day and that it would impact on the quality of life.</li> </ul> <p><b>Response to Comment:</b> Consideration of these impacts are contained in the following sections later in the report: Environmental Impacts of proposals in surrounding areas.</p>
Owner of Flat C, 4 Bulls Head Passage	<p>Objection on the following grounds:</p> <ul style="list-style-type: none"> <li>• Concerned that the proposed development will impact light into the apartment and significantly reduce light later in the day and that it would impact on the quality of life.</li> </ul> <p><b>Response to Comment:</b> Consideration of these impacts are contained in the following sections later in the report: Environmental Impacts of proposals in surrounding areas.</p>
Owner of 60 Gracechurch Street	<p>The owner of 60 Gracechurch Street has submitted a detailed objection and while they do not object to the principle of the redevelopment they have requested the application be deferred on the ground that insufficient information has been submitted to enable the application to be determined at this time. In summary the ground of</p>

	<p>objection contained in the letter cover the following matters:</p> <ul style="list-style-type: none"> <li>• States that the redevelopment of 70 Gracechurch Street must be considered in context and any redevelopment must clearly demonstrate that there would be no adverse impact on the future development potential of 60 Gracechurch Street.</li> <li>• Seek further information to demonstrate that the proposed development of this site will not hinder the future development potential of 60 Gracechurch Street.</li> <li>• The scale of the proposed building does not accord with that of the surrounding area and the cumulative impacts of 55 and 70 Gracechurch Street would be significant.</li> <li>• The proposed development has potential to have an adverse impact on the amenities of existing occupiers on ground of potential loss of daylight and sunlight.</li> <li>• Concerns raised regarding Historic England’s comment and the impact of the development and its effect on daylighting to Leadenhall Market and any consideration in advance of satisfactory resolution would be premature.</li> </ul> <p><b>Response to comments:</b> Consideration of these impacts are contained in the following sections of the report: The Building’s Form and relationship to the Eastern Cluster; Design Approach; Designated Heritage Assets; Environmental Impact of proposals on surrounding area. It is not considered that approving this application would have an adverse impact on future re-development on nearby sites, including 60, Gracechurch Street. Any proposals for such re-development would have to be considered on their own merits.</p>
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**Policy Context**

32. The development plan consists of the London Plan and the City of London Local Plan. The Mayor of London and the City of London have prepared draft plans which are material considerations to be taken into account in the determination of the applications.

33. The Draft London Plan is at an advanced stage. It takes forward many of the policy positions of the existing plan whilst strengthening and adding to others. On the 13th March 2020 the Secretary of State directed the

Mayor not to adopt the Plan due to it not satisfactorily addressing a number of national policies in respect of housing ambition, small sites, industrial land and aviation. Following an exchange of correspondence and further directions issued by the Secretary of State on 10th December 2020, the Mayor approved the 'Publication London Plan' which is intended to address the Secretary of State's directions on 13th March 2020 and 10th December 2020. On 21st December 2020 the Mayor sent the draft Publication London Plan to the Secretary of State for his consideration. The Secretary of State responded on the 29th of January 2021 formally confirming that the version of the London Plan provided on the 21st December 2020 contained the modifications necessary to conform with the previous directions. As it has passed through the Examination in Public, and there are no longer any barriers to the adoption of the plan it is expected that the new London Plan will be published shortly. As such it can be afforded significant weight as a material consideration. Given there is likely to be a period of time between any resolution to grant planning permission and the permission being issued, to allow for the negotiation of the S106 agreement, it is possible that the new London Plan will be adopted before the permission is issued, should members resolve to grant planning permission.

34. In relation to this scheme the Draft London Plan continues to support a mixed-use office scheme in the Central Activities Zone (CAZ). The changes that are most relevant to this scheme are those that encourage good growth, enhance climate change, good design and sustainability requirements and further support requirements for public access and routes through sites.
35. The draft City Plan 2036 was agreed by the Court of Common Council in May 2020 for pre-submission, Regulation 19, consultation. Amendments to the Plan, taking into account the 2020 revisions to the Use Class Order, were approved by the Court of Common Council in January 2021. The Plan is therefore a material consideration in the determination of planning applications. Regulation 19 consultation is due to commence in February 2021. As the plan has not yet reached the regulation 19 stage, it can only be afforded some weight.
36. The London Plan and Local Plan policies and supplementary planning guidance documents that are most relevant to the consideration of this case are set out in Appendix B to this report.
37. Government Guidance is contained in the National Planning Policy Framework (NPPF) 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.
38. In respect of sustainable development, the NPPF states that paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At Paragraph 11(c) the NPPF states that for decision making this means 'approving development proposals that accord with an up-to-date development plan without delay'.

39. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
  - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
40. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
41. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 103 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.
42. Paragraph 111 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.
43. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 124 advises that “The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
44. Paragraph 127 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
45. Paragraph 131 sets out that great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
46. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 151 states that new developments should increase the use and supply of renewable and low carbon energy and heat

through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.

47. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 190 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
48. Paragraph 192 of the NPPF advises, "In determining applications, local planning authorities should take account of:
  - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness."
49. Paragraph 193 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance,
50. Paragraph 194 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
  - a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."
51. Paragraph 196 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable

importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area.

52. Paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

### **Considerations**

53. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
54. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
55. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990); (the tree planting and street improvement works are located in the Leadenhall Market and Eastcheap Conservation Area, engaging this duty in relation to the conservation areas).
56. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
57. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
58. The principal issues in considering this application are:
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
  - The economic benefits of the proposal.
  - The appropriateness of the proposed uses.

- The appropriateness of the bulk, massing and design of the proposals.
- The impact of the proposal on the Tower of London World Heritage Site.
- The impact on strategic views in the Local Views Management Framework and on local townscape views.
- The impacts of the proposal on other designated heritage assets, including Leadenhall Market, The Monument, Tower Bridge, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street and 7-8 Philpot Lane.
- The impacts of the proposal on the Leadenhall, Bank and Eastcheap Conservation Areas.
- The proposed public realm benefits and cultural offer
- Transport, servicing, cycle parking provision and impact on highways.
- The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.
- The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.

#### **Economic Issues and the need for Development**

59. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating J69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.
60. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
61. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs).

62. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
63. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.
64. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.
65. The London Plan projects future employment growth across London, projecting an increase in City employment of 116,000 between 2016 and 2036, a growth of 22%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
66. Emerging London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
67. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
68. The draft City Plan (2036) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

69. The application site is located within an area identified as the Eastern Cluster in the Local Plan 2015 (Figure G) and within the City Cluster area (Figure 33) identified in the draft City Plan 2036.
70. The Cluster Policy area is defined by an illustrative diagram in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. As outlined at paragraph 2.7 of the Local Plan and paragraphs 3.55 and 7.13 of the draft City Plan 2036 the boundary as shown in the diagram is indicative and not prescriptive.
71. Paragraph 3.4.4 of the emerging City Plan (2036) identifies the City Cluster as a key area of change where office and employment growth will be accommodated by a cluster of tall buildings, complemented by retail, leisure, cultural and educational facilities, ground floor animation, additional greening, high quality public realm and improved pedestrian movement and permeability.
72. Objection has been raised by the owner of 60 Gracechurch Street to the south of the site, that the proposal would prejudice development opportunities for that site. There is no evidence to indicate that permitting the current application would prejudice future development of nearby sites such as 60 Gracechurch Street. Office development is encouraged across the City and each case is decided on its own merits.
73. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations and as outlined in the City of London document: London Recharged: Our Vision for London 2025.

#### Proposed uses

74. The proposed building has been designed to provide a flexible workplace-led mix of uses. The 33 storeys above ground predominantly provide office use (Class E) with flexible retail use (Class E plus Sui Generis drinking establishment and hot food takeaway) at lower ground mezzanine and ground floor levels. A public viewing gallery (Sui Generis) is located at levels 29 and 30, accessed directly from the ground floor which provides amenity for City workers, residents and visitors. At the south east corner of the ground floor, permeability is enhanced to Fenchurch Street and Lime Street and there is increased permeability through the site from north to south with the introduction of a new publicly accessible route through the proposed development.

## Provision of Office Accommodation

75. Strategic Policy CS1 of the City of London Local Plan 2015 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the Draft Publication London Plan.
76. The proposed development would provide 72,992 sq.m GEA of office floorspace (an increase of 55,525 sq.m over existing) comprising well designed, flexible office accommodation in a sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan policy S4.
77. The shape of the proposed development would provide flexible floorplates which can be arranged and subdivided in a number of ways to accommodate a range of office occupiers. The shape of the floorplates allows for a prioritisation of natural lighting throughout the façade design and seeks to prevent overheating from sunlight. This range of options is well suited to providing for incubation spaces for start-ups, Small and Medium Enterprises (SMEs), with opportunities for subdivision and co-working spaces, which comprise the majority of the City businesses.
78. The proposed development seeks to provide roof terrace spaces for the use of office occupiers at podium and roof levels, these spaces would provide high quality amenity space to City workers and would contribute to the urban greening of the building. The proposed office provision addresses the needs of international business in accordance with Local Plan policy DM 1.2 and emerging City Plan strategic policy S4 and policy OF1.
79. The central part of the ground floor hosts the office entrance lobby, from which escalators and lifts provide access to the main sky lobby at the second floor. The lobby has frontages and access to both the proposed passageway and Fenchurch Street. Levels 2-32 provide office floorspace with associated facilities.
80. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers.

## Proposed Retail

81. The existing retail floorspace on the site is 9,274sq.m (GIA), it is occupied for retail use at lower ground, ground and first floors.
82. The proposed retail floorspace comprises 1,715sq.m (GIA) of flexible uses for a flexible mix of shops, cafes and restaurants (Class E), drinking establishments and take away (Sui Generis) to ensure the building can respond to market demand.
83. There is a significant loss of retail floorspace, 7,559sq.m, contrary to policy. Under policy DM20.1 and emerging policy RE1, the amount of active retail frontage remains largely the same due to the new pedestrian route through the building. There is existing 75m of active ground floor retail frontage and it is proposed that there would be 78m of active retail frontage at ground floor level. The policy is to resist the loss of retail frontage and floorspace.
84. The application proposes the ground floor and lower ground floor mezzanine would prioritise a mixture of publicly accessible space and retail space as well as entrances for the areas on upper floors. At the western part of the ground floor, a large retail space is provided to the south fronting Gracechurch Street, Fenchurch Street and the proposed passageway. This space has frontages to the west, south and east including a large curved frontage at the intersection of Gracechurch Street and Fenchurch Street. The eastern part of the ground floor is multifunctional. The space is entirely open to Fenchurch Street and Lime Street at ground floor to the east which accommodates a large piece of public realm in the daytime, suitable in part for retail pop up uses to provide further dynamic enhancement and activation to this space. A further large retail area is proposed towards the centre of the floorplate at lower ground floor mezzanine level. The lower ground floor provides publicly accessible toilets, including a changing places facility.
85. The site is located in the Leadenhall Market Principal Shopping Centre (PSC) as identified in the Local Plan. Policy DM20.1 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and that development should maintain a clear predominance of shopping frontage within Principal Shopping Centres.
86. In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, close to the Eastern Cluster contributing to meeting the City's targets for increasing office floorspace. Other Local Plan objectives met include provision of a new publicly accessible viewing platform providing higher level views and public areas, in line with emerging City Plan policy.

87. Although there is a loss of retail floor space, the amount of active retail frontage at ground floor level increases slightly. The proposed retail component of the scheme and creation of active frontages would enhance the public interest and vitality of the street frontages on Gracechurch Street and Fenchurch Street, and increase the permeability into the building through the creation of two permeable routes. One of these spaces can be used to provide pop up retail and contributing a further 580sq.m of retail space. The proposed development would provide flexible retail floorspace at ground floor across key frontages and at lower ground mezzanine level. The proposed retail would be fit for purpose in the context of a changing retail market, being flexible and adaptable in layout, in support of long-term vitality and viability of the Principal Shopping Centre. It is considered that the proposed use would complement retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access. During the day, there is potential for a pop-up retail space within the new permeable, accessible open space. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster. This space is flexible and would utilise the same space as the service entrance and so is considered on a flexible basis and is not permanent retail. On balance it is considered that the loss of retail floorspace is acceptable, the mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. However, the development proposed, would be contrary to adopted Local Plan Policy CS10, DM20.1 and Emerging City Plan policy RE1. A condition is recommended to secure retail uses falling within Class E and Sui Generis as proposed, and to prevent the change to any other use within Class E.

#### Proposed Public Viewing Gallery

88. Local Plan policy DM10.3 and draft City Plan 2036 policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.
89. A new public viewing gallery is proposed at levels 29 and 30 located in the western tower. The space would be mostly double height, with an ancillary area at level 30, mezzanine and visitor facilities. The space would provide views to the south, west and north and is suitable for a range of free public activities. The indoor space would include seating and planting and there would be a space for a small retail kiosk which would not restrict access to the area and would enhance the place for people to sit and dwell.

90. A glazed winter garden is located on the 29th floor on the southern side of the floor, providing a comfortable environment to enjoy the low winter sun. Given its south facing aspect it will be sunlit, bright double height space planted with evergreen vegetation.
91. The combination of the public viewing gallery and enclosed winter garden would result in an elevated public space of the highest quality, providing dynamic views across this part of London, providing a valuable space for culture as well as expansive views over London for all to enjoy.
92. The space would contribute to the network of free to enter viewing galleries across the City and internally would incorporate culture in the form of sculpture, art, pop up cultural performance and educational events.
93. The public viewing gallery would be free to access and would involve successful management of the space. The public viewing gallery and winter garden would be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later and there is no need for a booking system for users and would not be closed for private events during those hours. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the ground floor with dedicated lifts and security checks.
94. A Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.
95. A Visitor Management Plan and the use of the public viewing gallery and winter garden would be discussed and secured under the Section 106 negotiations and agreement.

#### Urban Greening

96. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO<sub>2</sub> while releasing O<sub>2</sub>, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people. Across the entire application site, the development achieves an Urban Greening Factor (UGF) 0.31 which exceeds the draft London Plan policy G5(B) UGF target of 0.3. When taking only the actual site ownership area into consideration, excluding public highway on Lime Street, Philpot Lane and Rood Lane, the UGF score is 0.37 using the GLA calculation methodology and 0.42 using the City of London calculation methodology.
97. The substantial increase in greening is integrated into the architectural approach on the building, delivering intensive living green roofs at levels 31 and 32, a green wall in Ship Tavern Passage, and mixed perennial, shrubs and tree planting to terraces at level 5 and 6, plus planting to balconies at all levels providing greening to the vertical recesses.

98. Mature trees are proposed on public highway land, including five in Lime Street and two in Rood Lane. These trees would be part of the public realm and highway enhancements proposed as part of the scheme. The trees would provide visual amenity as well as environmental benefits in terms of air quality, wind mitigation and habitat for the promotion of biodiversity.
99. The siting, size and planting palette would ensure year-round seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits. The details would be secured by condition and would include maintenance and irrigation details.

## **The Buildings Form and Relationship to the Eastern Cluster**

### Principle of a Tall Building

100. The proposal is defined as a tall building under the adopted Local Plan (CS 14, para 3.14.1 – those which significantly exceed the height of their general surroundings) and emerging City Plan (S12(1), buildings over 75m AOD>).
101. The proposal is located within the south west area of the ‘Eastern Cluster’ Policy Area in the adopted Local Plan (Policy CS7, Figure G) and within the ‘City Cluster’ Policy Area in the Draft emerging Local Plan (emerging Policy S21, Figure 33), which extends the Cluster to the south incorporating 20 Fenchurch Street and the area to its west. The emerging City Cluster identifies two Renewal Opportunity Sites, one of which, applies to the application site, and seeks tall buildings on appropriate sites.
102. The Cluster Policy area is defined by an illustrative diagram in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites.
103. The proposed tall building is not in an area identified as ‘inappropriate for a tall buildings’ in either Plan. Local Plan Policy CS14 and emerging City Plan Policy S12 indicate that planning permission should be refused for tall buildings in conservation areas.
104. The tall building therefore is to be assessed against the criteria set out in CS 14(3) and S12(2-6), and the wider provisions of the Development Plan.

### Skyline Impact and Relationship with the Cluster

105. The proposal would be read as part of the emerging City Cluster, defining the south western edge. The height, form and massing of the proposal has been amended considerably following extensive pre-application discussions to ensure a sensitive relationship with the Cluster, wider London skyline, historic skyline features, local views and the significance

of strategic heritage assets, in particular the Tower of London, St Paul's Cathedral and its processional route and the Monument, all of which are addressed in detail in this report.

106. The proposal has been designed with the future evolution and consolidation of the Cluster in mind. In strategic London-wide and riverside views the new tall building would counterbalance and subdue the assertive bulk of 20 Fenchurch Street as an outlier from the Cluster. The building would step up in three sections towards 20 Fenchurch and would be subtly inclined and tapered to enhance its silhouette. The proposal successfully moderates between the height and bulk of 20 Fenchurch and the rest of the Cluster to create a more cohesive City Cluster. The Sky Garden would remain visible as an elevated public space in important views.
107. The proposed three staggered, slender and tapered interconnected tower elements, together with the dramatic vertical green recesses, would break down the massing of the building into a tripartite arrangement. This would create a dynamic silhouette and architectural composition that would positively contribute to the variety of buildings in the City Cluster without dominating the skyline.
108. The proposal would be a maximum of 154.8m high. By way of comparison, the proposal is of a more modest height compared with most other existing and consented tall buildings in the Cluster (in descending AOD height order):
  - 1 Undershaft: 304.9m
  - 22 Bishopsgate: 294.94m
  - 122 Leadenhall Street: 239.40m
  - 110 Bishopsgate (former Heron Tower): 217.80m
  - 52-54 Lime Street 206.50m
  - Tower 42: 199.60m
  - 'The Gherkin' (30 St Mary Axe): 195m
  - 20 Fenchurch Street: 160m
  - 70 Gracechurch Street: 154.8m (the current proposal)
  - 50 Fenchurch Street 149.6m (Committee resolution to grant planning permission but the permission has not yet been issued)
  - 55 Gracechurch Street 146 m (Committee resolution to grant planning permission but the permission not yet been issued)

Design Approach: Architecture, Urban Design and Public Realm

109. The proposal would comprise a distinctive and carefully articulated building which is considered to be architecture of the highest quality. It would have outstanding sustainability credentials, is attractive and contextual at numerous scales and would enhance existing and create new high-quality public realm appropriate to the character of this part of the City.

110. The proposed building responds positively to the scale of its townscape context through a podium base with stepped back tapered tower elements above. The proposed solid podium and lighter treatment to the towers create a complimentary yet distinctive ensemble. Its visual impact would enhance the skyline and local views of the City Cluster as well as the setting of nearby conservation areas and listed buildings.
111. The massing is broken down successfully through three interconnected tower elements which taper inwards towards the top and bottom, creating a pleasing sculptural composition. The recesses in between would feature cascading greening, providing texture, depth and contrast.
112. Each of the three vertical tower elements are staggered in plan and elevation, creating a rhythm and breaking down the bulk. The height rises in three steps from 139.5m on the western edge up to 154.8m towards the east.
113. Greened, recesses in between the three tower elements on the north and south facades would cascade over and grow up from the terracotta balconies on alternate floors. The vertical greening would provide an attractive and architecturally distinctive contrast of soft and hard materiality, colour, depth and texture on the facades as well as environmental benefits. The contrast would visually soften and break up the mass of the building in close up as well as in wider City views. The vertical greening and darker terracotta to the recessed balconies would enable the tapered tower elements to appear distinct and coherent.
114. The proposed façade treatment is of high quality in terms of architecture and sustainability. The tower elements would comprise a curtain wall framework of expressed slim metal horizontal projecting bands at each floor, offset vertical, shaped mullions and fluted terracotta spandrel inserts in between, resulting in a textural approach with modulation, articulation and depth. The offset vertical mullions help turn the curved corners that vary in radius up the height of the building. The dramatic curved corners would ensure an attractive architectural appearance from all angles and a softer form on the skyline.
115. The design incorporates vents for natural ventilation through slots in the mullions, supports solar shading and the slowing of downdrafts towards the podium and street level. The curved corners of the tower elements assist with wind mitigation.
116. The proposed podium base is divided into three corresponding bays below the three tower elements on Fenchurch Street to break up the scale of the frontage. The podium reduces in height in from six storeys on Gracechurch Street down to four storeys on Lime Street to respect the established height of the immediate context and the adjacent Leadenhall Conservation Area.
117. The podium would feature dramatic, tapered terracotta columns at 4.5m centres. These would create the appearance of solidity, depth and rhythm to the podium when viewed obliquely and relate to the materiality and character of the immediate townscape, tying the building

comfortably into its setting. Terracotta spandrels would express the floorplates.

118. The podium is topped by a pronounced cornice, giving clear architectural definition to the height of the podium which would respect the established scale of development in the surrounding streetscape.
119. Greening to the podium recesses on Fenchurch Street would soften and enhance the street frontage. A green wall would be incorporated into Ship Tavern Passage to positively address the blank inactive frontage and enhance the visual amenity of the space.
120. The corner at Gracechurch Street and Fenchurch Street would be expressed with a dynamic curved corner treatment, to both podium and tower elements to mark its townscape prominence.
121. The podium block responds to the scale and character of the immediate context. It presents well-proportioned, well-detailed facades to Gracechurch Street, Fenchurch Street, Lime Street and Ship Tavern Passage and respond to their distinctive architectural and spatial characters.
122. The detailed design and architecture of the proposed development is of an excellent standard. Both the towers and podium would make a positive contribution to the local area and the emerging City Cluster of tall buildings. The proposed high-quality materials and detailed design provide a richness to the building, appropriate to the character of the City as well as the setting of surrounding buildings and spaces. The elevations would have a depth and quality of modelling, of a high standard of design and architectural detail.
123. Arranged around the base of the podium would be a series of high quality and active frontages with multiple entrances. The south east corner would be open-sided, providing a vast area of outdoor publicly accessible space in daytime hours when flatbed servicing lifts are not in use. This will allow pop-up retail and cultural uses in this area, enriching the variety of activity in Lime Street.
124. A new, spacious 9m wide pedestrian route is proposed directly through the site from Fenchurch Street to Ship Tavern Passage. This is a key public benefit of the scheme, improving north-south routes in the City Cluster and linkages to Leadenhall Market and its retail uses.
125. The proposed ground floor would be attractive, permeable, legible and provide good levels of passive surveillance. Appropriate signage and lighting would be incorporated.
126. York Stone and the specified City natural pallet of high-quality public realm materials would be used throughout to create seamless integration with the wider public realm, in accordance with the City Public Realm SPD and associated Technical Guidance.
127. Further public realm enhancements are proposed to the public highway in Rood Lane, Philpot Lane and Lime Street including the provision of five street trees to the east of Lime Street and two street trees at the top

end of Rood Lane. The trees would perform as wind mitigation features as well as provide visual and environmental amenity.

128. The proposals deal successfully with a change in level across the site. It would be step-free and inclusive for use by all without undue separation or hinderance. The management approach is to allow unrestricted and inclusive access for all which would be secured via legal agreement. It is important that the elevations, external and part internal, in particular at ground and first floor level, need to be well detailed to achieve this positive interface and active frontage, and this is reserved for condition. Security features have been, where possible, designed integral to the architecture, avoiding visual clutter and obstacles, whilst creating a safe place.
129. Lighting, in accordance with the adopted City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be ensured via condition.

## **Heritage**

### **Tower of London World Heritage Site – Impact on Outstanding Universal Value (OUV)**

#### **Outstanding Universal Value and Relationship**

130. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value, itself set out in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: i.) an internationally famous monument ii.) landmark siting and iii.) physical dominance of the White Tower.
131. The WHS Management Plan establishes a ‘local setting area’, an ‘immediate setting’ and a non-spatially defined ‘wider setting’. The proposal is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations.
132. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre, stating (at paragraph 2.4.25), *its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London*. It is also acknowledged that the Cluster had an emerging identity and that the relationship between the ToL and the Cluster is long-established, having existed for over half a century. It

acknowledges the Cluster forms a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at paragraph 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider i.) their effect on the established Cluster ii.) the space between it and the ToL and iii.) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

133. Whilst being proportionate, the assessment uses the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

#### Impact on OUV/Significance

134. The proposal would have an in-direct impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change will be apparent in a number of views including those from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London.

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

135. This viewpoint is identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).
136. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern.
137. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (paragraph 185). The visual management guidance states that the background should be managed sensitively, and that development

should not compromise a viewer's ability to appreciate OUV (paragraph 186).

138. The proposal would be located at a considerable distance to the west of the ToL, on the western periphery of the Cluster. A small triangular slither of the eastern facade would be visible adjacent to the north west of 20 Fenchurch Street. The main bulk of the building, however, would be concealed behind 20 Fenchurch Street in this view. The impact on the wider setting of the ToL would be negligible.
139. Appearing at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not harm those relevant attributes of OUV. It would leave unaffected those relevant components which also form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship to the River Thames and City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paragraphs 183-186). The effect of the proposal (when considered alone) on this view and on OUV and the setting and significance of the designated heritage assets is minor and neutral and the cumulative effect as a result of the proposed development and other proposed developments is negligible and is not considered to harm the setting of the WHS or its OUV.
140. In terms of wider compliance, given the siting, scale, form and orientation, which consolidates the Cluster, the proposal would have minimal visual impact and would not detract from the composition of the view, preserving an appreciation of identified landmarks, including the observers ability to recognise and appreciate the relevant Strategically Important Landmarks, the ToL and St Paul's Cathedral, in accordance with London Plan Policies 7.11 and 7.12 and Local Plan Policy CS 13. It would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

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

141. This Protected Vista is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL and the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413).
142. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, which would be largely obscured from view, behind 20 Fenchurch Street, on the western periphery of a consolidating Cluster, it would not undermine the composition and characteristics of the view or those landmark

elements. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it. As only a thin slither of the proposed development is visible in the context of the other emerging and consented schemes in the Cluster, the contribution of the proposal to the cumulative effect is negligible and would be neutral in effect, not resulting in any harm to the setting of the WHS and its OUV.

143. The siting, height, scale, stepped massing and attractive, sleek and slender profile would comprise a high quality design, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 418-422) and guidance contained in the Local Setting Study. The cumulative impact of the proposal would result in a slight change but would not result in any harm to the setting of WHS and OUV.

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

144. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.
145. Given the pre-eminence of the River Thames in the foreground and the significant intervening distance between the Tower of London and the proposal, which would be on the western periphery of a consolidating Cluster, it would not undermine the composition and characteristics of the view or those landmark elements. It would allow the observer a recognition and appreciation of the ToL as the Strategically Important Landmark.
146. The proposal would not affect the clear sky backdrop of the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, ‘dominance’ and silhouette of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS and its OUV.
147. When considering cumulative impact, the proposal would be largely obscured in the views by 55 Gracechurch apart from a small slither. The cumulative impact would be negligible and not harmful to the view, setting or significance of ToL WHS and its OUV.

## Other World Heritage Site Views

148. The Local Setting Study (Section 7) identifies Representative Views which are deemed to exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. In particular the proposal would impact on views across Tower Green, Inner Ward, Inner Curtain Wall, North and Inner Curtain Wall, South, and the representative impact is contained in submitted THVIA views 10A-10D (from the Inner Ward and Inner Curtain Wall), in addition to views 7-9 from Tower Bridge Approach and Tower Wharf.

### Inner Ward, Tower Green and the Scaffold Site

149. Historic Royal Palaces, in making a representation, acknowledge the proposal would appear part of the Cluster, and that it “*would not be significant*”. Historic Royal Palaces have raised no objection to the proposal. Historic England, whilst considering that the proposal would be “*appear as a sliver of development mostly concealed by, and lower than, the existing building at 20 Fenchurch Street*”, consider the proposal would be a slight increase the amount of modern development encroaching into the Inner Ward, resulting in overall cumulative modest degree of harm. Historic England considers that the proposal will result in less than substantial harm to the significance of the Tower. It is the view of your Officers that the proposal would not cause harm.
150. In most of these views, the proposed building appears as a sliver. In View 7 from Tower Bridge Approach North much of the east façade is visible but appears as a comparatively smaller scale and recessive than the neighbouring 20 Fenchurch Street and 50 Fenchurch Street for which there is a committee resolution to grant permission (subject to the prior completion of the s106 agreement). These views are deemed by the Local Setting Study to illustrate well the ToL’s significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under ‘key issues’ it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings – qualified in the associated ‘Objectives and Guidance’ development should i.) respect that sense of place and ii.) ensure the buildings surrounding the Inner Ward remain the focus of the view.
151. The Local Setting Study acknowledges that there is a range of views in the Inner Ward. The proposal would, in most views, be hidden behind the western range of enclosing buildings, having no visual impact. From views nearer the White Tower looking towards the Chapel of St Peter ad Vincula, the proposal would be a sliver, non-prominent feature which

would adjoin 20 Fenchurch Street at some intervening distance appearing as part of the emerging long-established Cluster backdrop which to a degree breaches the silhouette of the Chapel. Moving toward the Chapel, in its immediate setting from the green, the proposal followed by the rest of the Cluster moves out of view and it is unchallenged and pre-eminent.

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

#### Inner Curtain Wall (South)

153. Views from the Inner Curtain Wall were assessed where the guidance in the Local Setting Study recognises it is a 360 degree viewing experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River, whilst under the associated guidance seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.
154. The proposal would again appear as a sliver of development adjoining 20 Fenchurch Street and when viewed alongside the proposed 50 Fenchurch Street and 1 Leadenhall (consented), would assist in consolidating the Cluster's distinct urban form and separate long-established identity. The White Tower, accentuated by its fortified massive masonry crenelated walls, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while that relationship with the River and an appreciation of it as a historic gateway would be undiluted. Historic England consider the proposal would result in slight harm which would reduce the prominence generally of historic buildings in what is a varied scene acknowledged in the Local Setting Study as one where "*modern buildings provide a clear contrast between the historic tower and the contemporary city outside its walls*" - an acknowledgment at ease with the concept of contrast between old and new reinforcing one another and contributing to the attribute 'landmark siting' and the component of this which is an established relationship between the ToL and the City beyond. It is considered that those identified relevant attributes and components of OUV would be preserved and the visual management guidance in the Local Setting Study would be complied with.

### Inner Curtain Wall (North)

155. 'The Local Setting Study, in assessing views from the north Curtain Wall acknowledges that this is a 360-degree experience and demonstrates a *clear contrast between the historic Tower and the modern city outside its walls*. The identified aim is to i.) maintain views that reveal the relationship between the Tower and the City and ii.) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings *could* reduce the perceived prominence of the Tower in its setting stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the Tower of London and the City to the north and that clear views of the concentric curtain walls should be preserved.
156. The proposal, sited a considerable distance to the west of these views, adjoining and subduing the isolated eye-catching form of 20 Fenchurch Street would, appear on the western side of the established Cluster, consolidating its distinct form, whilst preserving that relationship with the Tower of London. The concentric defences would remain pre-eminent and an appreciation undiluted in these views under the baseline and cumulative scenarios, also in accordance with the guidance.

### Chapel Royal of St Peter ad Vincula, Tower of London (Grade I)

157. Dating from the early 16<sup>th</sup> century, the grade I listed stone chapel in the grounds of the Tower of London is of very high architectural and historic significance and forms part of the World Heritage Site. The City Cluster rises above the Chapel Royal of St. Peter ad Vincula whilst 20 Fenchurch Street appears in the background to the left of the Chapel bell tower. The tall buildings are part of the setting of the Chapel.
158. The proposed development visually fills the small gap between 20 Fenchurch Street and the Chapel bell tower, while its height is at the same level as the solid base of the bell tower and would not extend to the distinctive lantern.
159. The change to this view is considered to be minor due to the marginal visibility of the proposed development. The distance away and high-quality architecture of the visible part would avoid any harm to the setting and its contribution to the significance of the listed building. The lantern bell-cote of the Chapel would be unaffected and remain seen against the sky backdrop. As such the proposal would not result in harm to the setting of the Chapel Royal of St Peter ad Vincula. The contribution the setting makes to the significance of the listed Chapel within the inner ward of the Tower of London would not be adversely affected.
160. The GLA have commented that the proposed tall building would cause less than substantial, cumulative harm to the significance of the Grade I

listed St Peter ad Vincula Chapel through the introduction of additional development in the backdrop of the listed church and the resultant loss of clear sky space.

161. The cumulative effect of the proposed development is a very small addition in relation to the other cumulative tall buildings in the Cluster. Its marginal visibility behind the bell tower makes a minor and balanced contribution to the cumulative effect and is not considered harmful to the setting of the Chapel or its contribution to the setting and significance of the other listed buildings within the Tower of London World Heritage Site.

*St Thomas's Tower, Tower of London (Grade I)*

162. St Thomas Tower was built by Edward I in the late 1270's and is part of the medieval palace at the Tower of London. It houses Traitor's Gate and faces the riverside. In views along the riverside walkway, 20 Fenchurch Street forms a prominent feature in the background of St Thomas's Tower. The City Cluster appears mainly to the right of the Tower. It is of outstanding historic, architectural and archaeological significance as well as being of outstanding universal value as part of the Tower of London World Heritage Site.
163. In the view looking north west along the riverside, the proposed development would appear to the right of 20 Fenchurch Street, with the bulk of the building hidden behind out of view. The degree of change to the setting is small and the effect would be neutral on the setting of St Thomas's Tower and the Tower of London as a whole. The setting would not be harmed and its contribution to the significance of St Thomas's Tower would not be affected.
164. In the HTVIA view 9 the development would appear above the concentric defences, including the Grade I listed St Thomas's Tower where it rises above the historic structure. The GLA have stated that "the existing harm caused by 20 Fenchurch Street is exacerbated by the proposal extending development to right in the view, extending the loss of clear sky space to the left of the outer tower, and diminishing the existing clear definition of the crenellations of the historic defences. Noting the harm in these views are seen in the context of existing tall buildings, GLA officers judge the level of harm to be less than substantial." The proposal would appear as a thin slice of development abutting 20 Fenchurch Street at some distance and would not detract from the appreciation of the crenellations and concentric defences of St Thomas's Tower.
165. The cumulative impact would be that the proposed development would be a very minor element in the view and would help to connect 20 Fenchurch Street to the rest of the City Cluster. The cumulative impact

is not considered to represent harm to the setting of the Tower of London.

#### Other Views

166. Other views have been provided which are not LMVF or identified Representative Views in the Local Setting Study, but which still demonstrate well the attributes and components of OUV where there is a relationship with the proposal. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which, towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster and the ToL ensemble, which would dominate in the immediate foreground, causing no harm.

#### Conclusion – Impact on Tower of London World Heritage Site

167. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV. The GLA consider that given harm has been identified to key listed buildings and the local setting, within the wider area based heritage asset of the Tower of London WHS, then the WHS and its Outstanding Universal Value is also judged to be harmed, but concludes that it is harm that is less than substantial. Historic England and the London Borough of Tower Hamlets also state that the cumulative impact of the proposal would result in less than substantial harm. The officers of the City of London do not concur with this opinion. In all views, including the relevant approach and representative views, it is considered in line with the WHS SPG that the scale of change in all instances is deemed to be between negligible and minor and where the magnitude of impact is considered small on those relevant attributes of OUV. It is considered in all instances that the overall impact would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble. It is the view of your officers that the proposed development would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, the conservation area, or the Scheduled Monument.

#### Wider London View Management Framework Impact

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

169. The site falls outside of Protected Vistas in the LVMF but impacts on a number of the identified Assessment Points. Designated London Panoramas at View 1 (Alexandra Palace), 2 (Parliament Hill), 3 (Kenwood), 4 (Primrose Hill), 5 (Greenwich Park) and 6 (Blackheath Point) are all assessed in the submission, as the proposal would be seen. The magnitude of change in these broad panoramas is considered negligible, and in all it would accord with the visual management guidance by consolidating the City Cluster, which is identified as a landmark in these compositions, preserving that composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral. From the designated Townscape View LVMF 26A (St James Park) the proposal would not have an impact.
170. Particular attention is given to the River Prospects where the magnitude of potential impact is greater, here addressed in turn.

View 15 (15.B.1 and 15B.2), River Prospect, Waterloo Bridge (Downstream)

171. This is an iconic London view. St Paul's Cathedral is identified as the Strategically Important Landmark. It is considered that the proposal would complement the development of the emerging City Cluster as a singular coherent entity in the skyline composition, assisting in subduing and taking the tension out of the isolated 'eye-catching' visual influence of 20 Fenchurch Street. The height is appropriate to the site and would step down from the apex of the Cluster around 22 Bishopsgate, towards the scale of the River and would be of a high-quality design. This is in accordance with paragraph 263 of the SPG visual management guidance.
172. The proposal would not draw tall buildings closer to St Paul's, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paragraphs 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified. The proposal would not harm the wider setting or view of St Paul's Cathedral.

View 16 (16B.1 and 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform

173. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street, preserving and enhancing the townscape setting of St Paul's whilst not detracting from wider

landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

#### Summary of LVMF Impacts

174. The proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS 13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and Draft Publication London Plan Policy HC4 and guidance contained in the LVMF SPG.

#### **Other Strategic Views (Local)**

##### The Monument to the Great Fire

175. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City.

##### *View from the Monument*

176. The Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye into the Bank Conservation Area and the fringe of the City Cluster.
177. The building would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall. The building would read as part of the Cluster, still allowing for an appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would not harm the view. The cumulative impact would be that the proposed building would be obscured by the proposed 55 Gracechurch Street development.
178. No other identified view from the Monument would be affected.

##### *View of and approaches to the Monument*

179. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be in its near setting.
180. From Tower Bridge the proposal would be mostly obscured in the view by 20 Fenchurch Street, causing no harm to the view towards the Monument.

181. The Queens Walk view of the Monument from directly opposite on the South Bank would remain unaffected. The proposal would not have a direct interface in the backdrop of the Monument. The building would be seen some way to the left of the Monument and would not detract from its setting or views of it. It is considered that the proposal would accord with the guidance in the Protected Views SPD.
182. The SPD identified approach to the Monument view from the Gracechurch Street/Lombard Street junction, would be unaffected as the site does not fall within this view.

#### Fleet Street / Ludgate Hill: The Processional Approach to St Paul's Cathedral

183. The proposal would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street or Ludgate Hill. It would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

#### St Paul's Cathedral – Views From

184. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the tower would sit to the left of 20 Fenchurch Street, consolidating the Cluster. It would not obscure or detract from a City skyline landmark and would be an attractive addition to the skyline. It is considered it would preserve the composition and character of these views.

#### Views from other publicly accessible elevated viewing areas, in particular the 'Sky Garden' at 20 Fenchurch Street

185. The Sky Garden public viewing gallery at 20 Fenchurch Street was an integral ingredient taken into account in the planning balance in the 20 Fenchurch Street decision letter. The impact on it as a public attraction and sensitive receptor is a material consideration. The scheme was amended at pre application stage to minimize its impact here.
186. The viewing experience offers a unique 360-degree experience over different levels along a perimeter walk, with a large south-facing external terrace. Due to its siting and height the proposal would not impact the open experience of the south terrace or the quality of the microclimate. The impact would be limited to a small section of the north western aspect and would be transitory as part of the overall experience. The cumulative impact together with 55 Gracechurch Street (committee resolution to grant planning permission) would be to impact on the views looking west and north west from the Sky Garden. At no point would it obscure an appreciation or understanding of important cultural and heritage assets, notably the River Thames and

its bridges, Westminster, St Paul's Cathedral or Bank Junction. The design of the roof has been architecturally integrated and considered to create an attractive feature with greening to the roofs and facades to enhance the view. Overall, it is considered that the viewing experience from the Sky Garden would not be harmed by the proposal.

187. By virtue of the orientation and height of the proposal it would not harm the viewing experience at consented public terraces at 1 Leadenhall, 120 Fenchurch Street, 1 Undershaft, 22 Bishopsgate, 100 Leadenhall or 50 Fenchurch Street (Clothworkers) for which the committee have resolved to grant planning permission.
188. Outside the City, from the Tate Modern Viewing Gallery on Bankside, the proposal would further consolidate the Cluster as a distinguishable urban form and would not harm the viewing experience.

#### Other Views

189. The proposal has been assessed in terms of its impact on 44 views as set out in the Heritage, Townscape and Visual Impact Assessment. The proposal has been appropriately designed in relation to its surroundings. Although the building would be visible in many views, its high-quality design and appropriate massing would not detract from the visual amenity of the townscape views. The proposed development protects significant views of important buildings, townscape, riverscape and skylines and would not result in any harm to any of the views identified in the Heritage, Townscape and Visual Impact Assessment. The settings and significance of the listed buildings and landmark buildings featured within these views would not be harmed by the proposals.
190. In terms of the townscape, the HTVIA concludes that the impact the development has on the townscape is beneficial with no negative impact. Officers concur with this assessment and consider the impacts of the proposed development on townscape views is neutral to minor beneficial.

#### **Designated Heritage Assets (Direct and In-direct Impact)**

##### Leadenhall Market Conservation Area

191. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance of the Conservation Area as deriving from the vibrancy of the historic market, the characterful Medieval street grid, small scale of buildings, streets and spaces in dramatic contrast to the immediate setting.
192. The site is on the boundary of the Leadenhall Market Conservation Area on Ship Tavern Passage and Lime Street. A small part of the application site on Lime Street itself is public highway that partly falls

within the Leadenhall Market Conservation Area. The proposals include public realm enhancements to this public highway and planting of five street trees in Lime Street. This would specifically benefit and enhance the Leadenhall Conservation Area, and views into and out of the conservation area along Lime Street and from Fenchurch Street.

193. The GLA consider that there would be a less than substantial level of harm to the Leadenhall Market Conservation area “owing to the scale of the development and its position on the conservation area’s southern boundary, the proposal would have a significant visual impact on the contribution made by the setting to the ability to appreciate the significance Leadenhall Market Conservation Area”. The GLA, however, concur with the City of London’s assessment that large-scale modern development, visible over the roofs of lower scale buildings is characteristic feature of the conservation area given its proximity to the eastern cluster. Furthermore, the GLA acknowledge that the public realm works to Lime Street and improved pedestrian connectivity between Fenchurch Street and Leadenhall Market are modest enhancements.
194. The proposed tall building would be sited outside of the Leadenhall Market Conservation Area but would have an impact on its immediate setting and some views into and out of it. Given the enclosed nature of the Conservation Area, in particular, the roof of the market, the proposal will be generally concealed from view. Where visible it will be appreciated alongside 20 Fenchurch Street in the backdrop. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market Conservation Area.
195. The proposed podium relates to the general scale of building frontages in the Leadenhall Conservation Area and steps down in height from Gracechurch Street to Lime Street to respect the predominant scale and height of frontages within the Conservation Area. The solidity of the proposed podium is characteristic of the materiality of the area.
196. The vertical greening on the tall building, would provide visual amenity and environmental benefits to the setting of the conservation area, including mitigating wind and heat impacts.
197. The public benefits include a free public viewing gallery at levels 29 and 30, which would enable the public to enjoy elevated views from which to appreciate and better reveal the conservation area and the distinctive roof structures of the listed II \* Leadenhall Market.

198. At ground level a new publicly accessible route would be provided through the building from Fenchurch Street linking into the Conservation Area at Ship Tavern Passage. This new route builds on the traditions of courts, alleys and quieter routes which characterise the Conservation Area. It would enhance the pedestrian experience of routes into the Conservation Area, provide active frontages and improve linkages to Leadenhall Market to the north of the site.
199. The public realm proposals and trees in Lime Street would enhance the character and appearance of the Leadenhall Market Conservation Area. The new podium and tower building would not result in harm to the setting, significance, and views into and out of the Leadenhall Conservation Area.

#### Eastcheap Conservation Area

200. The Eastcheap Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance as an area with strong historical associations with the Thames, with post-Fire landmarks and good commercial architecture occupying an ancient street pattern and urban grain. The setting is defined by an established relationship with modern tall buildings in the backdrop, such as 20 Fenchurch Street. The majority of Conservation Area views would be unchanged, given the particular dimensions and character of a unique historic urban grain.
201. Public realm improvements are proposed to the highway at the north end of Philpot Lane as part of the overall development. This small part of the site is located in the Eastcheap Conservation Area. The proposed landscaping of the public highway would enhance the character and appearance of the Eastcheap Conservation Area and would incorporate appropriate traditional materials such as York stone and granite. The proposed enhancements would be in accordance with the City Public Realm enhancement strategy:
- Rationalise street furniture
  - Improve the pedestrian experience
  - Enhance paving and surfaces
  - Introduce more trees and planting
  - Preserve historic character
  - Create an inclusive environment
  - Maximise the sustainability of each project.
202. The proposed tall building is not located in a conservation area and is situated on the north side of Fenchurch Street some way from the boundary but would impact on the setting of the Eastcheap Conservation Area in views looking north along Philpot Lane. The height, massing and architecture of the proposed building is typical of what characterises the existing setting and would not harm the setting

or significance of the Eastcheap Conservation Area or views into or out of the Conservation Area along Philpot Lane.

**Designated Heritage Assets – Impacts on the setting and significance of listed buildings and conservation areas**

**The Monument (Grade I and Scheduled Ancient Monument)**

203. The Monument to the Great Fire (“the Monument”), by Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666. It comprises an elegant fluted Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal. It is of exceptional architectural, artistic, historic and archaeological significance as a City/London-wide landmark.
204. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance.
205. The Proposal would appear to the left in the backdrop and setting of the Monument on approach from London Bridge, on axis from the South Bank (Queen’s Walk, western end). On approach from Lower Thames Street/Fish Street Hill the proposal would appear to the right, some distance away and would not impinge on the silhouette of the Monument. The proposed development would not harm the setting or significance of the Monument as a grade I listed building and Scheduled Ancient Monument.

**Tower Bridge (Grade I)**

206. Tower Bridge, completed in 1894, was designed by Sir John Wolfe Barry and Sir Horace Jones for the City of London Corporation. It represents a triumph of Victorian engineering as a low hybrid suspension and bascule bridge and features gothic towers and turrets in a dramatic composition that frames the river.
207. The proposal would largely leave the visual experience of Tower Bridge unaffected, including in views from the north, south and west. From Butler’s Wharf and other views to the east, 20 Fenchurch Street would almost entirely screen the proposed building from view.
208. The GLA acknowledge that the proposed development would have a negligible impact on the contribution made by the setting to the ability to appreciate the significance of Tower Bridge. However, the GLA officers consider that further analysis is required specifically in views from the river and in views looking west from Shad Thames further east. As noted above the applicant has provided this information to the GLA and it forms part of the background papers to this report.

209. The HTVIA includes Views from the River Thames on Millennium Bridge (View 37) and views from further east from Butlers Wharf (View 12) and Kings Stairs Gardens (View 11). Furthermore, 3D digital modelling techniques have been used to enhance the assessment of the scheme and ensure a thorough analysis of the impacts on the setting and significance of Tower Bridge. The officers of the City of London consider that the impact on views and setting of Tower Bridge has been fully and properly assessed and the proposal would not result in harm to the setting and the significance of the grade I listed Tower Bridge.

#### Leadenhall Market (Grade II\*)

210. The site is in close proximity to the Grade II\* listed Leadenhall Market, which is a large and decorative top-lit Victorian market building in wrought iron and glass designed by Horace Jones in 1881. It has a complex of roofed footways with detached portions to the south, lined with open fronted shops. It has a well preserved interior, but on the exterior it is surrounded by tall buildings of the modern City of London. Its significance lies in its high architectural and historic interest.
211. Where visible the proposal will be appreciated alongside 20 Fenchurch Street in the backdrop, such as looking south from Gracechurch Street, or Leadenhall Street, along Whittington Avenue. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views and is part of the significance of the setting. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market.
212. Historic England have raised concern regarding the impact on daylight to Leadenhall Market. The market's covered spaces are artificially lit to ensure adequate lighting. The day light levels are not considered to be a contributor to the significance and special architectural or historic interest of the listed building. A change in daylight levels would not harm the setting and significance of the listed building. Impact on sun and day light is dealt with in another section of this report.
213. There are proposed improvements to Lime Street which include the extension of the existing shared surface down to Fenchurch Street, with York stone paving and new trees along a widened pavement. All of these aspects will lead to an improvement in the listed building's setting and the new publicly accessible connection from the south, through the site, will serve to better reveal its significance in a minor way. Historic England "recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and

improved public realm in general". The proposed elevated public viewing gallery would result in better revealing its significance by affording views and appreciation of the historic and characteristic roof structures of the market.

214. There is the opportunity for Leadenhall Market's current use to be supported by complementary uses in the proposed development, supporting the sustainability of the listed building.
215. The proposal would change and to some degree enhance the setting of the listed building. There would not be harm to the setting or significance of the listed Leadenhall Market buildings.

#### The Ship Tavern Pub, Lime Street (Grade II)

216. The Classical mid-19<sup>th</sup> Century public house is located diagonally opposite the application site in Lime Street and is of architectural and historic interest. The setting is characterised by dramatic change in scale with the backdrop of tall buildings which forms part of the settings significance. The proposed high-quality architecture of the replacement building would be an enhancement to the setting of the Ship Tavern. The carefully designed podium that steps down towards Lime Street would respond to the lower height and smaller scale and would contribute positively to the setting of the Grade II listed Ship Tavern on Lime Street. The proposals and the public benefits it would provide to the public realm in Lime Street, including the planting of five street trees would enhance its immediate setting.

#### 81-82 Gracechurch Street (Grade II)

217. 81-82 Gracechurch Street is a 19<sup>th</sup> century classical building of Portland stone. Its significance lies in its architectural design and façade details. The development would be prominent in southward views of 81-82 Gracechurch Street with the massing of the development highly visible above the roofline of the building. GLA consider "the harm to the contribution made by the setting to the ability to appreciate the significance of this building to be less than substantial."
218. The immediate setting is characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings. The proposal will change the immediate setting due to the increase in height compared to the existing. The masonry clearly expressed podium would relate to the established scale on Gracechurch Street and the tall building would be typical of the existing backdrop setting, which features dramatic change of scale. The setting would not be adversely affected by the proposals

and the contribution of the setting to the significance of the listed building would be unchanged and unharmed.

#### 7-9 Gracechurch Street (Grade II)

219. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style. It is located on the west side of Gracechurch Street to the north of the application site. Its significance lies in its architecture and historic interest. Its wider setting features a mix of buildings in age, materials, style and height. The juxtaposition of heights and architecture, including the City Cluster of tall buildings is part of the character of the setting. The proposal would be a high-quality addition to the south eastern wider setting and there would be no adverse impact on the setting of the listed building.

#### 39-40 Lombard Street (Grade II)

220. Built 1868, by Francis, of Portland Stone in an ornate Italianate palazzo manner. Comprising a tall ground floor (potentially a former banking hall) and rich carved classical detail to the upper floors. It is of architectural, artistic and to a slightly lesser extent historical interest. Its immediate setting, defining the corner of Gracechurch Street and Lombard Street, seen alongside other classical Portland Stone commercial edifices, makes a modest contribution to significance overall.
221. The GLA consider the introduction of new development of significantly greater scale opposite the listed building in Gracechurch Street to result in less than substantial harm to the significance of this building. The GLA state that “The proposals would alter the contribution made by the setting to the ability to appreciate the significance of the Grade II listed 39-40 Lombard Street, opposite the site”. The scale of the new development would be appreciated in open northward views along Gracechurch Street however this would be viewed in the context of the existing office developments in the immediate setting and tall buildings of the eastern cluster in the background.
222. On approach from the west along Lombard Street the backdrop is commanded by the bulk of 20 Fenchurch, which would be subdued by the proposal. The full significance of the building is better appreciated in close view, in particular where the sumptuous detail can be appreciated, where given the scale of 39-40, and the height-to-width ratio of the street, it would command the foreground, while the proposal would only be visible at a high level in the oblique. It is considered that the impact would be of low magnitude and no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street.

### 7-8 Philpot Lane (Grade II\*)

223. Much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic and archaeological significance, less so artistic. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards.
224. The proposal would be seen and appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane and located close to 20 Fenchurch Street. These dramatic contrasts in scale between the old and new are an established character trait of this setting which otherwise in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed building will continue to dominate.
225. It is considered the proposal would preserve the special interest/significance, and the contribution made by setting to the significance of 7-8 Philpot Lane.

### Custom House, Lower Thames Street (Grade I)

226. Custom House is a very large and imposing neo classical riverfront building of Portland stone. It was built 1813-1817 by David Laing and rebuilt by Robert Smirke in 1825. It is of high architectural and historic significance, connected to its function as an office for the collection of customs and excise taxes. Its open foreground setting on the river contributes to its significance and enables the appreciation of the architectural qualities in long views from the southbank and bridges over the River Thames. The wider backdrop setting to the north features the tall buildings of the City Cluster, creating a dramatic contrast in scale and form.
227. 20 Fenchurch Street is a prominent feature in the background setting of the listed building. In a position from the south bank where the Custom House would lie in axis, the listed building would be fully obscured by the HMS Belfast. Moving further to the west, where the façade of Custom House comes into view, the proposed development would be

partially visible in a gap between existing and consented tall buildings. This is a minor addition in the background of the view, and the high quality of the proposed design will add richness to the overall composition. This will cause no harm to the setting or significance of the listed building or the ability to appreciate it.

228. The view assessed at View 36 of the HTVIA, from Southwark Bridge, looks towards Cannon Street station with its listed towers prominent in the middle-ground, and the City's Eastern Cluster towers in the background. Nos.52-54 Lime Street (the Scalpel) appears between the two listed towers. The proposed development would appear in the foreground of the Scalpel, the three distinct vertical forms of the proposal, each tapering to the top and with curved corners, adding an element of interest in the background of the view. Its addition would not detract from the significance of the listed towers which will remain recognisable and prominent elements in the view, maintaining their relationship with the river and the railway line. There is considered to be no harm to their significance or the ability to appreciate it.
229. Officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including the two Cannon Street Station Towers and the proposals have been subjected to a robust and thorough assessment.
230. Officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including Custom House and the proposals have been subjected to a robust and thorough assessment.
231. The proposal would be visible in the backdrop of Custom House and form part of its existing characteristic City Cluster wider setting but would not appear in close proximity. The significance of the setting of the listed building and the setting's contribution to the significance of Custom House would not be harmed by the proposals due to the distance and high architectural quality of the building.

Former Billingsgate Market, Lower Thames Street (Grade II)

232. Billingsgate Market, by Horace Jones, was built in 1872 as the City's fish market. Its significance lies in its French 17<sup>th</sup> century classical style architecture, in brick with attractive Portland Stone dressings as well as its historical uses. Its riverfront setting contributes to its significance. Its backdrop is characterised by considerably taller buildings in the wider setting. The change in scale is part of the existing setting. The proposed tall building would form part of the typical change in scale and would not harm the setting of the listed building or the contribution that setting makes to the significance of the listed building.

233. The background setting of the listed building is dominated by the form of no.20 Fenchurch Street. View 16 of the HTVIA shows a view looking straight at the listed building from the south. The proposal would form a minor addition to the already established and evolving Cluster of tall buildings in the background of Billingsgate Market and Custom House in northerly views.
234. The proposed development would replace Tower 42 in the view, slightly closing the sky gap between no.20 Fenchurch Street and no.20 Gracechurch Street further to the left. The addition of the proposed development to the view, by virtue of its high-quality architecture adds interest to the composition. In the context of the existing background setting of this listed building, the partial visibility of the proposed development is not considered to harm the setting and significance of the listed building or the ability to appreciate it. Officers have used 3D modelling digital techniques to assess the impact of the scheme on significant designated heritage assets including former Billingsgate Market and the proposals have been subjected to a robust and thorough assessment.

#### Adelaide House, King William Street (Grade II)

235. Adelaide House, built by Sir John Burnet and Tail in 1924-5 is a large, steel framed office building of 11 storeys, faced in Portland Stone and granite, with archaic Greek and Egyptian style decorative motifs. Its significance lies in its high architectural quality, historic interest as an art deco office building and its setting on the north east side of London Bridge and the River Thames.
236. The GLA have stated that the proposed building would affect the silhouette of Adelaide House and consider that the level of harm would be less than substantial.
237. Views 18, 19 and 20 of the HTVIA illustrate the visual impact of the proposal on the listed building. Within these views the eastern cluster provides a backdrop to and above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views and The Leadenhall Building, 22 Bishopsgate and Tower 42 appearing prominently behind. In the cumulative views, 55 Gracechurch Street, with a recent resolution to grant consent would block the view of the proposed building almost entirely.
238. The tall buildings of the Eastern Cluster do not detract from the ability to appreciate its significance. The proposal would not adversely affect the silhouette of the listed building.
239. The proposed development would add a high-quality element to the wider northern setting which features a variety of old and new buildings

of varying scale. The stepped form of the tripartite tower would be partially visible. The proposal would enhance the northern setting in terms of the collection of tall buildings which make up the City Cluster. The addition of the proposal would maintain the character of the backdrop and would not harm the setting or significance of the listed building. The proposal would not affect the contribution the setting makes to the significance of Adelaide House.

#### Cannon Street Station Towers (Grade II)

240. The pair of towers at Cannon Street Station, at Cousin Lane and Allhallow's Lane, were built 1865-6 possibly by E M Barry and used to mark the junction of the train shed with the bridge. The brick towers feature open arched upper parts, square domed roofs with squat lanterns and spire. Their significance lies in their townscape landmark presence in river views, their architectural quality and functional association.
241. The setting of the towers is characterised by a mix of building styles, heights and periods as well as the tall buildings of the City Cluster in the wider backdrop. The change in scale as a result of the proposal would not change the character of the backdrop setting. The high-quality architectural appearance of the proposed development would not detract from the setting of the listed towers. The significance of the listed towers would not be affected by the proposals.

#### Former Port of London Authority Building, 10 Trinity Square (Grade II\*)

242. Built 1912 – 22 by Sir Edwin Cooper, this monumental Portland stone landmark building in the Greek classical style features a richly embellished tower. Its setting includes a broad range of buildings in terms of period, style, height and materiality. It forms part of the setting of the Tower of London and is a clearly identifiable landmark feature in river prospect views. Its significance lies in its architecture and historic Port of London civic function, and to a lesser degree its setting including the Tower of London.
243. The GLA consider the proposal to result in less than substantial harm to the setting and significance of the listed building by encroaching on the open sky above the former Port of London Authority Building.
244. In Views 7, 10D and 13 of the HTVIA, the proposed development does not appear above the listed building, but above Minster Court which currently forms a backdrop to the listed building on the left side. The proposed development would not impinge on the skyline of the tower of this listed building. Its robust architectural form and contrasting materiality when compared to the Cluster buildings would remain a prominent element in these views. There would be no harm to the

significance of this listed building, or the ability to appreciate its significance, as result of the proposed development.

245. The proposed development would appear in the north western backdrop of the listed building and would nestle close to 20 Fenchurch Street. The City Cluster and contrast in the scale and form is part of the setting. The change presented by the addition of the building would not detract from the quality of the setting or its contribution to the significance of the former Port of London Building. The distinctive landmark tower of the listed former Port of London building would remain easily identifiable and appreciable on the skyline. As such the proposals would not result in harm to its setting or significance.

#### Church of St Mary Le Bow, Cheapside (Grade I)

246. The large red brick and Portland stone church was built by Wren in 1670-83. Its square tower and steeple are one of Wren's best and an important landmark feature seen from some distance away. Its significance lies in its outstanding architectural quality and historic interest as one of Wren's finest City Churches, its historic 12<sup>th</sup> century crypt and its ecclesiastical use.
247. In the view looking east along Cheapside from the junction of Wood Street, towards the proposed development, the square tower and spire of St Mary Le Bow appears as a very prominent feature, rising above the prevailing context and seen against a backdrop of sky. The foreground and the distant backdrop feature large modern buildings. The proposed development would sit behind 20 Gracechurch Street and 20 Fenchurch Street in this view. It would appear below the level of the street clock on the church tower and would not intrude into the silhouette of the tower seen against the sky. The tapering form stepped three elements and rounded corners of the proposal would result in an elegant and softer form in the far distance backdrop. The small change to the setting would not result in harm to the setting of the listed building or the significance of the listed building.

#### Church of St Mary Woolnoth, Junction of Lombard Street and King William Street (Grade I)

248. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.

249. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. This makes a medium contribution to the significance of the Church.
250. GLA officers are of the view that the cumulative visual impact of the proposed building would cause less than substantial harm to the setting of Grade I listed church of St Mary Woolnoth.
251. The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. The foreground of Portland Stone classical buildings backdropped by the baseline and cumulative Cluster of tall buildings behind creating a theatrical contrast in scale and character between the old and new City. The Church in part is backdropped by 20 Fenchurch Street and the proposal would form part of that backdrop, adding visual balance and softening the impact through its curved corners, tapering form and materiality. It is a kinetic and transient relationship and from the junction of Lombard Street and King William Street the Church is the pre-eminent foreground monument with a skyline presence. Given the transient nature of the impact, at a point when the view is most complex and varied with an established backdrop of the Cluster, it is considered that the magnitude of impact would be minor and that no harm to the significance or setting of the church would arise, especially given the significant distance of the proposal to the east. The Church would still have a sky-backed skyline presence in important local views, and it would remain a prominent City landmark and skyline feature.

#### Church of St Edmund the King, Lombard Street (Grade I)

252. The Built in 1670 by Wren, it features a distinctive tower with an octagonal lead covered lantern and concave spire. It is of very high architectural, historic, artistic and archaeological significance. Its setting features the classical Portland stone and brick historic buildings to the west and the rising new towers of the City Cluster as its backdrop to the east, providing a dynamic and dramatic contrast in scale to the setting that is characteristic of the City.
253. The church is the focus of the view along Lombard Street and is seen against the backdrop of 20 Fenchurch Street. GLA officers are of the view that the cumulative visual impact of the proposed building would cause less than substantial harm to the setting of Grade I listed church of St Edmund. As part of the kinetic experience of moving eastwards down Lombard Street, the proposed development moves into its background. As the viewer moves further forward, the existing no.20 Gracechurch Street would move into the listed building's background.

This overlaying of historic and contemporary buildings and changing backdrops within the dense townscape of the City, add richness while emphasising the historic qualities of the townscape through counterpoint. This would not detract from the significance of the Church or its neighbouring listed buildings, and the distinction between the historic and contemporary buildings would remain clearly discernible.

254. The proposed building would balance the backdrop setting of the Church of St Edmund the King, by framing the spire and reducing the lopsided impact of 20 Fenchurch Street in this view. The solidity of the materiality and softness of the curved corners would form an appropriate backdrop and the impact of the change would be minor and not harmful to setting or significance.

### 1 Cornhill (Grade II)

255. A grand Classical building of rusticated Portland stone with an iconic rounded corner supporting dome, built in 1905. Its significance lies in its high architectural quality and landmark presence in views looking east from Bank Junction and Cheapside. It is situated at the junction of Cornhill and Lombard Street and the surrounding heritage buildings of distinction make up its immediate setting and contribute to its significance. The wider setting is characterised by the visibility of tall, modern buildings which is part of its character and does not detract from the significance of the listed building.
256. GLA officers consider further analysis of the development's contribution to the setting of 1 Cornhill in views from Poultry (looking east) should be undertaken to establish how the development impacts on the ability to appreciate the asset's significance. The City have carried out a thorough analysis of the impact of the proposals on views, including from Poultry, via the use of 3D modelling and digital technology to enhance the assessment of the scheme. In the view from Poultry, looking towards the curved corner formed by no.1 Cornhill the proposed development would appear in the background to the right and away from its dome. The significance of the listed building and the ability to appreciate it are unaffected. As noted above the applicant has provided this information to the GLA and it forms part of the background papers to this report.
257. The introduction of the proposed development in the wider setting would not affect the significance of the listed building. The proposed development would largely hidden in views from Bank Junction. In views from Cheapside the proposed building would sit behind 20 Gracechurch Street and to the right of 1 Cornhill. There would be no effect on the significance of the listed building and no harm to the setting.

## Other Listed Buildings

258. The impact of the proposals on the settings of the other listed buildings and their significance, identified in the THVIA have been fully assessed and taken into consideration. These include the City Churches of St Peter, St Magnus the Martyr, St Margaret Pattens and St Michael Cornhill. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to the relative distance of the proposal where it would not appear unduly prominent, would not impact on the roofscape silhouette of the listed buildings, the presence of other tall buildings that characterise the existing settings and existing built fabric blocking the view of the proposed development in the backdrop. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.
259. The proposals would not harm the settings of any listed buildings or adversely impact on the contribution that the setting makes to the significance of the listed building.

## Conservation Areas

### Bank Conservation Area

260. The boundary of the Bank Conservation Area lies on the west side of Gracechurch Street, diagonally to the south west and the north west of the application site, but not directly opposite. The proposal will be visible from a number of vantage points within the Bank Conservation Area including along Lombard Street.
261. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. It's most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate/Gracechurch Streets, mitigated, in their own way, through the modelling and detail of the lower storeys of the existing and consented towers. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new.
262. The majority of the Bank Conservation Area comprises a dense, tight-knit urban grain with strong streets enclosures, an essential character trait, which would remain undiluted. It is only in a few more open vistas would the proposal be appreciated.
263. The GLA state that the development would introduce a notably taller building which would have a significant visual impact on the immediate setting of the conservation area at the eastern boundary, particularly in View 31 of the HTVIA along Lombard Street.

264. The proposal will be visible in some views as part of the distant backdrop as a fleeting, transient element alongside 20 Fenchurch Street. The impact is not considered harmful and is not an unusual relationship in the Conservation Area, with fleeting views of the City cluster with the dynamic contrast of the historical City in the foreground and new City exemplified as the cluster of towers as a distant backdrop.
265. In those views north and south along Bishopsgate/Gracechurch Street, the proposal would read part of the cumulative Cluster of tall buildings. By reason of its complementary materials, and solid, robust and modelled masonry base there would be a positive dialogue with the scale and proportions of the Conservation Area opposite. The proposal would form part of that prevailing contrast in scale on the eastern border of the Conservation Area.
266. View no 29 identified in the Bank Conservation Area Character Summary and Management Strategy SPD looks north along the boundary of the Bank Conservation Area on Gracechurch Street. The existing view features tall buildings in the backdrop setting to the north on Bishopsgate. The proposed development would appear on the right in this view, with the vertical greening to the recesses evident and forming a striking feature. The proposals would not harm the setting of the Bank Conservation Area in this view.
267. Overall, the proposal would result in some minor change to the setting of the Conservation Area, but not in a manner which would undermine that significance, which would be preserved.

#### Tower Conservation Area

268. The Tower Conservation Area lies within the defined Local Setting of the Tower of London, within the London Borough of Tower Hamlets. The Tower Conservation Area is tightly drawn around the Tower, its Liberties, the Royal Mint Site and eastwards to include the area around St Katherine's Dock.
269. The Conservation Area was first designated in March 1977 and the Character Appraisal published in March 2008 describes it as "one of the largest and most significant Conservation Areas in the Borough". It comprises of a complex pattern of overlapping developments over two thousand years. The Tower of London itself is by far the most significant site in the conservation area, due to its symbolic, historic and architectural value and is designated as a World Heritage Site of Outstanding Universal Value. The White Tower remains the focal point of the western part of the Conservation Area. The eastern part of the Conservation Area around St. Katharine's Dock has undergone

significant changes since the closure of the docks and the character of buildings and spaces are more varied.

270. The history of this Conservation Area dates back to the foundation of the Roman city in around 50AD. The alignment of the Roman Walls fixed the position of the Tower a thousand years later. William the Conqueror began construction of the Tower of London after his invasion in 1066 and used surviving parts of the south-eastern corner of the City Wall to form the southern and eastern defences to a new fortress at the corner of the city.
271. The Character Appraisal describes the Tower of London on page 8: The architectural and urban character of the Tower today was shaped by its original purpose as a fortress. The White Tower is the most significant and memorable element of the fortress, visible from behind the lower defensive stone walls. It is significant as one of the oldest pieces of architecture in the City and as an innovative example of Norman design. It also has immense symbolic value as an internationally recognized icon of London.
272. Although it is no longer the largest building on the London skyline, from most angles it retains a sense of detachment from the city. This is due to its location within the low defensive walls, the large open spaces surrounding the tower and most importantly the clear silhouette of the White Tower against the sky. Views of the Tower are protected in the London Plan and the detailed guidance on how the policies are to be managed is to be found in The London View Management Framework.
273. The White Tower's sense of detachment from the rest of the city, its aloofness and its inaccessibility are essential aspects of its visual character and evidence of its historic purpose. They make a critical contribution to its architectural and historic value, but they are also vulnerable to damage from development elsewhere in London, including tall buildings well outside the Conservation Area.
274. The Tower Conservation Area is surrounded by a mix of modern developments of varying size, form and period. The western backdrop setting of the Tower Conservation Area is characterised by the tall buildings of the Eastern Cluster and the dramatic contrast in scale, form and period of buildings.
275. The development would result in a minor change to the setting of the Tower Conservation Area as the development would be visible in westward views from within the conservation area over the outer curtain walls and moat area of the Tower of London (View 7 of the HTVIA). The GLA consider the proposal to cause additional cumulative harm to the setting and significance of the Conservation Area in this

view by encroaching on the open sky above the grade II listed former Port of London Authority building.

276. The proposal would be seen at some distance in the context of the other existing and consented tall buildings, including 55 Gracechurch Street, and nestled behind 20 Fenchurch Street. The proposal would not impinge on the silhouette of the tower of the former PLA listed building. In other views across the Conservation Area it would appear as a thin sliver and would have a negligible impact. The existing setting is characterised by the juxtaposition of historic buildings and the tall City cluster. The proposal is therefore considered to not result in cumulative harm to the setting and significance of the Tower Conservation Area. The setting and its significance and the significance of the Tower Conservation Area would not be harmed by the proposals.
277. The Conservation Area Management Guidance advises on page 22 that “Any new development in this area should respect the importance of the Tower and should follow the guidelines in the World Heritage Site Management Plan.” The WHS Local Setting Study is key in this respect and these views have been assessed in detail and no harm was found. The proposal would not detract from the quality of the views and the ability to appreciate the Tower Conservation Area and the WHS and landmark listed buildings in the view. As such, the setting and significance of the Tower Conservation Area would be unharmed by the proposal.

#### Other Conservation Areas

278. Overall, the proposal would result in some minor change to the wider backdrop setting of other Conservation Areas, but not in a manner which would undermine that significance, which would be preserved. The tall buildings of the City Cluster and the dramatic change in scale is part of the characteristic backdrop to many conservation areas, which would be preserved and unharmed.

#### Conclusion on Heritage

279. The proposal would preserve the special architectural and historic interest/significance and setting of strategic, landmark designated heritage assets, including St Paul’s Cathedral, Tower of London, Tower Bridge and Monument.
280. The proposal would not result in any harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the significance or setting of the listed buildings, Scheduled Monument and conservation area. The significance of the Tower of London and the

ability to appreciate its OUV would be unharmed by the slight change to its setting and the cumulative impact of the scheme.

281. It is considered that the high quality architecture of the new building, public realm enhancements, greening, tree planting, new pedestrian route and elevated public viewing gallery would result in a minor enhancement to the setting of listed Leadenhall Market and its contribution to the significance of the listed building.
282. The immediate setting to the listed Ship Tavern on Lime Street and 7-8 Philpot Lane would both be enhanced by the public realm enhancements. The proposals would not harm the setting or significance of other listed buildings in the vicinity identified in the HTVIA.
283. The character and appearance of the Leadenhall Conservation Area and Eastcheap Conservation Area would be preserved and enhanced by virtue of the tree planting and public realm enhancements to Lime Street and Philpot Lane. The setting of these conservation areas and the settings contribution to the significance of the Leadenhall, Eastcheap and Bank Conservation Areas would not be adversely affected by the proposals. The dramatic contrast in height and scale of building is a feature of the setting of these conservation areas on the boundary of the City Cluster and is considered acceptable and not harmful to significance.
284. It would not harm the setting of any designated and non-designated heritage assets and would not detract from LVMF, townscape, riverscape, skyline, protected views and views into and out of the surrounding conservation areas.
285. The proposal includes a number of public benefits which in turn would benefit the settings of designated heritage assets, including new pedestrian routes, public realm enhancements, greening and elevated public viewing gallery, affording new views of the City's heritage.
286. The proposed development in terms of its height, massing, materials, architectural design and greening would enhance the visual appearance of this part of the City. The setting of nearby listed buildings would not be harmed, and the development would provide a visually positive contribution to the character of this part of the City.

### **Archaeology**

287. The site is in an area of important archaeological potential at the centre of the Roman City and overlying remains of the first Roman Forum, the second Forum which replaced it, and the adjacent street network which are of high significance. There is also potential for pre-historic and

medieval remains to survive. An Historic Environment Assessment has been submitted with the application.

288. Archaeological excavation has been carried out on the site prior to construction of the existing and earlier buildings on the site. There are areas of important Roman remains of the early development of the Roman City and Fora surviving on the west, south and east perimeters, outside the basement area. The existing building was designed to minimise archaeological disturbance and protect remains around the perimeter of the site.
289. The proposed development includes four basement levels within the existing basement footprint, reuse of some of the existing piles, new pile capping beams, additional foundations on the west and south-east sides of the site and a small extension to the south east area of the basement. The additional foundations and extended basement would have an archaeological impact.
290. One new pile is proposed on the western perimeter of the site. It would partly be located over an existing low-level tunnel, which was constructed in the 1960's, to minimise archaeological disturbance. Remains of the first and second Fora and pre-Forum deposits would be affected where they survive outside the area of tunnel construction. Pile capping beams are proposed, and these would not have an archaeological impact.
291. In the south east corner, the basement would be extended, a new piled wall installed and slab for the lower ground mezzanine floor. This area has been partially excavated and would have an impact on remains of the Roman Fora and foundations of St Dionis Backchurch which may survive here. There are remains of the Roman Forum conserved in this area and these would not be affected by the new piling.
292. The scheme includes new landscaping and tree planting. Excavation for the tree pits may have an impact on post medieval and late medieval remains and structures surviving in this area.
293. The proposals are acceptable subject to conditions to cover details of a programme of archaeological work and foundation design.

### **Public Access and Inclusivity**

294. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy 7.2 of the London Plan and policy D5 of the draft Publication London Plan.

295. The principles of inclusive design have been incorporated into the proposals. The ground floor of the development is highly permeable, with a number of entrances and new routes through the site which would be open 24 hours a day. As part of the proposed Section 278 works the stepped entrance to Leadenhall Market from Ship Tavern Passage would be made an accessible route, and therefore enhancing this route and the entrance to Leadenhall Market. All accommodation and facilities are served by accessible lifts; two public lifts from ground floor serve the public viewing terrace. Accessible WCs are provided throughout the building, including on levels 29 and 30 of the public viewing gallery. A Changing Places facility has been provided on the lower ground floor mezzanine. Accessible cycle parking facilities are included. While the development is car free, there is one accessible blue badge space located in the under-croft area to the east of the site, accessed via Lima Street.
296. The development is considered to comply with the relevant policies of the Development Plan and draft plans outlined above.

### **Cultural Strategy**

297. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Vision has been submitted in accordance with draft City Plan 2036 Strategic Policy S6.
298. The Cultural Vision outlines its strategy for the development based on utilising different parts of the proposed development and highlights the following objectives:
- To provide multifunctional space in the undercroft at ground floor, suitable for a range of pop up uses such as exhibitions, performances, experiential retail events and markets;
  - To provide a new high quality and generously proportioned passageway through the site from Fenchurch Street to Ship Tavern Passage, improving access to Leadenhall Market and generally contributing to the network of exciting and engaging pedestrianised routes in the City. There are opportunities to consider the implementation of art installation within the passageway (e.g. poster displays) subject to agreement with the City of London and maintaining a clear footway width;
  - To provide a public viewing gallery at the top of the building, contributing to the network of free to access elevated public spaces across the City for the use of the City residents, workers and visitors; and
  - To provide opportunities for enrichment within the public viewing gallery, including supporting exhibitions and public events.

299. A Cultural Implementation Strategy would be secured in the S106 agreement to secure a year round Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users.
300. The policies referred to above are complied with.

## **Transport, Servicing & Parking and Impact on Public Highways**

### Cycling

301. The Draft Publication London Plan policy T5 requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
302. The Draft Publication London Plan requires 985 long stay cycle parking spaces. The applicant is proposing 1002 long stay cycle parking spaces; this exceeds the London Plan standards.
303. The long stay cycle parking, which is proposed to be located at Lower Ground Level, would be accessed via 2 cycle lifts accessed from Lime Street. There are also 2 goods lifts and a gullied stairwell to add capacity at peak times adjacent to the lifts proposed.
304. The London Plan requires 102 short stay cycle parking spaces. The applicant is proposing 28 short stay cycle parking spaces (which includes 3 cargo cycle spaces), which is below the London Plan standards.
305. The applicant is providing 17 additional long stay cycle parking spaces in lieu of short stay cycle parking spaces. Given the provision of 28 short stay cycle parking spaces (25% of the provision), and over provision of long stay cycle parking, the proposal is considered acceptable due to the constraints of the site. The shortfall in short stay cycle parking spaces would not give rise to any unacceptable impact on highway safety would not give rise to a severe residual cumulative impact on the road network.
306. 5% of the cycle parking spaces are accessible for adapted cycles and this will be secured by planning condition. the remainder of the long stay cycle parking will be made up of two-tier racks and folding cycle

lockers. The overall design and layout of the cycle parking will be secured by condition.

307. The proposals include 100 showers and 700 lockers to complement the cycle parking provision. The shower and locker provision is in line with the Publication London Plan and is acceptable.
308. A Cycling Promotion Plan will be secured by planning condition. This will include information and evidence of the built facilities, and all measures taken to increase the modal share of cycling to the development.

#### Vehicular Access

309. The development is car free (in that there is no private vehicle parking provision at the development), except for one blue badge parking space, which is in line with Local Plan 2015 Policy DM16.5 -1 and Draft City Plan 2036 policy VT3-1 and the Draft Publication London Plan.
310. TfL have requested a Parking Design and Management Plan (PDMP) should be secured by condition. This will include details on the proposed operation of the blue badge space.

#### Servicing and Deliveries

311. Policy DM16.5 of the Local Plan and draft City Plan 2036 Policy VT2 – 1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing of new developments to take place outside peak hours (7am – 10am, 12pm – 2pm and 4pm – 7pm on weekdays) and requires justification where deliveries within peak hours are considered necessary. Publication London Plan policy T7 G requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
312. The servicing of the building would take place off-street via 2 innovative vehicle lifts accessed from Lime Street, that will form part of the public realm during the day. The access on Lime Street will be slightly realigned. The design will be agreed with City of London as part of the Section 278 process.
313. The vehicle lifts are a relatively new concept to the City of London, but the lifts have been successfully used elsewhere in the world. When not in use, the lids of the vehicle lifts would form part of the public realm blending in with the rest of the area and people will be able to walk over the lifts and use the public space. When the lifts are in use, the lid of

the lifts would raise up, to allow a vehicle to drive into the lift, the lift would then lower the vehicle into the basement.

314. The applicant has given evidence relating to the risk of vehicle lift failure, which is rare with their preferred manufacturer. Nevertheless, to reduce the risk of lift failure, the applicant has agreed to sign up to a lift maintenance strategy, and service level agreement to ensure failures are fixed in a timely fashion and do not impact negatively on the public highway.
315. Vehicles would be able to enter and exit the servicing lifts in forward gear.
316. The servicing area is at Level Basement 1, where 4 loading bays and storage spaces would accommodate vehicles up to 10m in size. It is proposed to have electric vehicle charging facilities within the basement servicing area.
317. If a vehicle arrives and the ingress lift is already in use, there is space for the vehicle to wait off street, until the lift is ready to use.
318. It is proposed the number of deliveries to the development per day is capped to 60 and this will be secured in the Section 106 agreement. This is a significant improvement on the current situation, currently there are approximately 113 daily delivery and servicing trips and 17 delivery and servicing trips in the peak hour. The proposed maximum number of deliveries per hour for the new development is 8.
319. Waste collection will take place in the same way as all other servicing vehicles and will be included in the daily cap of 60 vehicles.
320. The applicant has agreed to no servicing between 0700 and 2300. In the day, the area where the servicing lifts are located can be used as a public realm space, and this is considered a benefit of the scheme. When the lifts are in use the opening from Lime Street will be closed off, this will be between 2300 and 0700 and is considered acceptable.
321. The development will be required to produce a delivery and servicing plan (DSP), and this will be secured in the S106 agreement.
322. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day.
323. The applicant is also proposing to use cycle couriers as part of their servicing strategy, and this will form part of their submitted DSP.

### Public Realm and HVM (hostile vehicle mitigation)

324. People will be able to walk north/south through the building from Fenchurch Street, providing relief to the footways surrounding the development and offering a new route.
325. The new pedestrian through route will be open to the public 24 hours per day and is step free, it will be permissive path land.
326. In respect of the service lifts area, there is a 1cm gap between the lift and the surrounding surface when the lifts are not in use; this gap is not considered a safety concern as it is a similar width to slot drains.
327. There may be market stalls or public furniture placed on the lids of the vehicle lifts when the lifts are not in use, to allow people to dwell.
328. The canopies around the building are at a height of 6m which is considered acceptable. The canopies will require Technical Approval and projection licences.
329. HVM may be required at the entrances to the public space on Lime Street, and at the ends of the pedestrian through route; the HVM will not be placed on public highway and a requirement to provide further details of this for approval have been secured by condition.

### Public Transport

330. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B.
331. The site is located close to Cannon Street, Fenchurch Street and London Bridge National Rail Stations. The site is located close to Bank/Monument and Cannon Street underground stations. The site is close to several bus routes on Gracechurch Street and Fenchurch Street.
332. The submitted Transport Assessment indicates that the overall increase in trips across all modes would have a negligible impact on the surrounding highway and public transport network capacities.

### Pedestrian Comfort

333. Transport for London's Pedestrian Comfort Guidance recommends a minimum comfort level of B+, and the aim in the City of London Transport Strategy is that all pavements will have a minimum Pedestrian Comfort Level of B+.
334. A thorough PCL assessment has been conducted for the development. As a result of the proposed development, which provides a new

pedestrian route through the development, the majority of locations will perform at a minimum PCL score level of B.

335. The table below shows the PCLs currently and as proposed.

Location	Base		Base 2027 (no diversion)		Base 2027 (with diversion*)	
	AM	PM	AM	PM	AM	PM
Fenchurch Street north	B-	B	B	B-	B	B
Philpot Lane east	B+	B+	B	B	B	B
Philpot Lane west	F	F	B	C+	B	C+
Gracechurch Street east	C+	C+	B	B	B+	B+
Lime Street east	F	F	B+	B+	B+	B+
Lime Street west**	B+	B	C+	C+	B-	C+
Rood Lane east	A+	A+	A+	A+	A+	A+

*\*Assumes a conservatively predicted 10% of people may divert through the new pedestrian route*

*\*\*Assumes no diversion of pedestrians flows through the site corner*

336. From the table above you can see that the proposed PM PCLs on Lime Street west drops from a B to a C+ and the AM PCLs on Lime Street west drops from B+ to B-. The reconfiguration of the Lime Street footways will narrow the western footway slightly (to allow the eastern footway to widen to an accessible width). This means the PCLs on Lime Street (west) will worsen. This worsening on the west side of Lime Street is considered acceptable because it allows the eastern footway on Lime Street to increase from a PCL score of F to B+.

337. The applicant was asked to investigate amending the footway at the corner of Gracechurch Street and Fenchurch Street to improve the PCL in this location, which is affected by the existence of a cluster of post,

signal box and traffic lights. However, this was not deemed possible due to the radius needed for large vehicles to turn left from Gracechurch Street to Fenchurch Street. Nevertheless, the PCL table above shows the PCL scores are acceptable on Gracechurch Street.

338. Should footway widening be proposed on the north side of Fenchurch Street as part of the Section 278 agreement, the PCL scores will improve on Fenchurch Street.
339. The development proposes a new pedestrian route through, realignment of Lime Street and Philpot Lane to enhance the footways and setting the building lines back in a number of locations to widen the footways.
340. Overall the PCL scores are predicted to generally improve from the existing levels to be in line with our Transport Strategy.
341. The existing trips to the development in the AM and PM peaks are 351 and 340 respectively. The proposed trips to the development in the AM and PM peaks are 1107 and 1080 respectively. These figures are considered acceptable due to the improvements in PCLs, the provision of a new through route for people walking, and the Section 278 Agreement scope.

### Construction

342. TfL have objected to the location of a pit lane on Gracechurch Street. This would mean that all construction activities would have to take place on Fenchurch Street, and this could add up to 30% additional time to the programme. However, TfL have agreed that they will engage collaboratively and positively when a contractor is appointed. Therefore, it is recommended a Construction Logistics Plan is secured by condition, for approval by the City in consultation with TfL.

### Section 278 Agreements

343. A Section 278 agreement will be secured by the City of London and by Transport for London (TfL) or appropriate legal agreement.
344. TfL have requested a J15k contribution towards a Cycle Route Quality Criteria study specified for the cycling link from the site to Cycle Superhighway 3 (CS3), and J135k to deliver cycling improvements identified by the study, and/or wider cycling improvements in the City of London.
345. The City of London Section 278 agreement will comprise, but is not limited to, works to the footways on Fenchurch Street, footway improvements on Philpot Lane, footway improvements and the

feasibility study of the extension of the timed closure on Lime Street, the removal of the 2no. existing steps on the public highway on Ship Tavern Passage, to create a step free route.

346. The Section 278 agreement will also include the realignment of the crossover to access the servicing lifts. This realignment will mean the current public cycle parking stands will need to be relocated, they are proposed to be relocated onto the widened eastern footway on Lime Street – the locations will be agreed in the detailed design with the City of London.
347. The Section 278 works will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision, including the potential for footway widening and greening. This would be secured through the Section 106 agreement.

#### Stopping Up

348. There is no stopping up of highway required.

#### **Environmental Impact of Proposals on Surrounding Area**

349. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

#### **Wind Microclimate**

350. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
351. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being

5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

352. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
353. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
354. Assessments have been carried out for both the windiest season and the summer season.
355. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

#### Wind conditions at street level

356. In the existing baseline conditions the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional sitting or standing. Further to the east around 20 Fenchurch Street where the conditions are windier, there is one location on the southeast corner of 20 Fenchurch Street which is categorised as uncomfortable in the windiest season.
357. Early testing of the effects of the development on wind microclimate led to the incorporation of a number of features into the design of the building and landscaping. These include:
  - Architecturally: An opening and undercut at ground floor to the south-eastern corner of the proposed development and the installation of a porous screen at the southern end of the passageway.
  - Landscaping: rooftop landscaping including 3m high deciduous and evergreen trees, shrubs, planting of 3m high trees at podium level and shrubs.
  - Wider public realm enhancement works: two 5m high deciduous trees along the eastern side of Rood Lane and five 5m high

evergreen trees located to the east on Lime Street with shrub planting.

358. In considering the completed development, in most locations the wind conditions would remain either in the same categories as existing or become windier but would continue to fall within a category suitable for the intended use.
359. A study has been undertaken to show the percentage change and degree level of change from one category to another. Tall buildings will generally increase the windiness of conditions around them, the existing site is quite calm as would be expected for a low-rise building, however 20 Fenchurch Street creates considerable windiness around it in the existing scenario. As the existing site contains a low-rise building, some locations see a considerable increase in wind conditions, but maintain acceptable conditions for the intended pedestrian activities. However, the entrance of 20 Fenchurch Street sees improved conditions.
360. With the proposed mitigation measures in place, all locations at street level would experience wind conditions appropriate to the intended use and there would not be any safety exceedances resulting in unsafe conditions.
361. In testing the proposed development and cumulative schemes within 400m of the site, with proposed mitigation measures in place, there would be no material change in wind conditions from the scenario of the proposed development with existing buildings. In addition, the redevelopment of 55 Gracechurch Street, which the committee recently resolved to grant permission for (Application number 20/00641/FULEIA) has been included as an additional separate cumulative scheme for assessment; as above the results show there is no material change from the scenario of the proposed development with existing buildings.
362. As part of the wind mitigation proposals, the installation of a porous screen would be installed within the new route through the site. The screen is required in order to satisfy the conditions in and around the area, without this the wind levels would be unacceptable. A condition is proposed to secure the design of this screen and its integration with the legible London wayfinding signs.
363. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.

364. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.
365. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan Policy 7.6, draft Publication London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

### **Daylight, Sunlight, Overshadowing**

366. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces is included in the environmental statement, supplemented by an Addendum dated 13<sup>th</sup> January 2021. Chapter 11 of the environmental statement identifies the methodology employed. When referring to the degree of adverse impact in this report (negligible, minor, moderate etc..) in this report, officers have adopted the terminology used in the environmental statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2011) are used as guidance to inform the assessment in the environmental statement. Policies 7.6 and 7.7 of the London Plan, policy DM10.7 of the Local Plan and policy DE8 of the draft City Plan set out the policy approach. Policy D6(D) of the draft Publication London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space. The policy set out in Policy DM10.7 of the Local Plan is to resist development which would reduce noticeably the daylight and sunlight available to nearby residential dwellings and open spaces to unacceptable levels. The Local plan states that the City Corporation will apply the methods in the BRE guidelines consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. The approach indicated by planning policy, in particular London Plan policy 7.6B is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. In applying London Plan policy 7.6B the BRE Guidelines can be used when assessing whether harm is

likely to occur, and further judgement made as to whether any such harm is unacceptable. Both the London Plan and Local Plan policies require a judgement to be made as to whether any harm is unacceptable and whether any reduction results in unacceptable levels of daylight and/or sunlight. The draft City Plan policy DE8 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context. The residential buildings and open spaces to be considered include those at 2-4 Bulls Head Passage, 4 Brabant Court, 9B Eastcheap, Jamaica Buildings, ancillary residential at The Ship Public House and The Grapes Public House. Impact on eight public amenity spaces is also to be considered.

367. The impact on four nearby churches were also assessed in the environmental statement, 3 experiencing no impact and one, St Edmund the King Church, experiencing minor adverse impact (as a result of failing to meet the No sky line criterion in one of seven rooms).
368. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of

their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

### Daylight

369. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
370. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
371. Of the buildings with residential accommodation assessed, The Ship PH, The Grapes PH and Jamaica Buildings were assessed as experiencing a negligible effect within the BRE Guidelines. The impact on the remaining three buildings is outlined below.

### 2-4 Bulls Head Passage

372. A total of 16 windows serving 9 rooms were assessed for daylight. For VSC, 8 would meet BRE criteria and 8 would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more.
373. Of the 8 affected windows, 7 would experience alterations between 20-29.9% which is considered Minor Adverse and 1 would experience an alteration of 33.7% which is considered Moderate Adverse. All 8 windows have low baseline values, ranging from approximately 5-10% VSC and therefore the percentage alteration is disproportionate to what the occupant would experience. 3 of these windows serve bedrooms which are less sensitive to daylight alterations as outlined in the BRE Guidelines.
374. For NSL, 2 of the 9 rooms would experience alterations between 20-29.9% which is considered Minor Adverse. One room is a bedroom and both rooms have very low baseline values of approximately 10-15% NSL and therefore the losses are unlikely to be noticeable to the occupants.
375. Overall, owing to the low VSL and NSL baseline values of this property, it is considered that the daylight overall effect is Minor Adverse.

#### 4 Brabant Court

376. A total of 15 windows serving eight rooms were assessed for daylight. For VSC all 15 windows see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more.
377. Of the 15 affected windows, 4 would experience an alteration in VSC between 20-29.9% which is considered Minor Adverse effect.
378. The remaining 11 windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect.
379. All the affected windows have existing levels well below the 27% VSC recommended by in BRE Guidelines, ranging from 4.2-10.5% VSC, whereby any alteration could result in a disproportionate percentage change.
380. For NSL, seven of the eight rooms assessed would meet the criteria set out in BRE Guidelines. The one affected room would experience an alteration in NSL of 27.1% which is considered Minor Adverse effect. The room is on the ground floor, facing into a narrow alleyway with an existing NSL value of 27.5%, which is below the 80% recommended in BRE Guidelines and therefore a loss of sky visibility is unlikely to be noticeable to the occupant.
381. Overall, owing to the low existing VSC levels and high level of NSL compliance, the daylight effect to this property is considered Minor Adverse.

#### 9B Eastcheap

382. 9B Eastcheap, located to the south of the site has planning permission to be used as residential and or short term lets. (Planning permission dated 04.02.2000 application number: 4280Y). It appears that at the present time the building is in use as short-term lets although the use can revert to permanent residential without the need to apply for planning permission. Short-term lets can be less sensitive to daylight and pollution effects owing to the temporary and transient occupancy.
383. The submitted assessment concludes that overall the residential units at 9B Eastcheap would experience Minor Adverse effect.
384. A total of 23 windows serving 19 rooms were assessed for daylight within this building.
385. For VSC, 11 of the 23 windows assessed would meet BRE's criteria and are therefore considered to experience Negligible effect.

386. Of the 12 remaining windows, two would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect whilst 10 would experience an alteration between 20-29.9% which is considered a Minor Adverse effect.
387. 3 of the impacted windows serve bedrooms which BRE Guidelines note are less sensitive to daylight alteration as their primary purpose is for sleeping. 6 windows serve living-room diners which are more reliant on good daylight.
388. Of these 6 windows, 5 have existing low levels of VSC (between 2-9%) and therefore any reduction in absolute VSC values has a disproportionality high percentage reduction and is disproportionate to what the occupant is likely to experience. The remaining window has a higher baseline value of approximately 14% and would experience a minor adverse alteration.
389. For NSL, 12 of the 19 rooms assessed would meet BRE's criteria and are therefore considered to experience Negligible effect.
390. Of the 7 remaining rooms, one would experience an alteration in NSL between 40-49.9% which is considered a Major Adverse effect and one would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect.
391. All 7 of these rooms are bedrooms which BRE Guidelines note are less sensitive to alterations in daylight.
392. The assessment considers that given the existing low level of daylighting to rooms, together with affected rooms being bedrooms, the impact on the property as a whole would be Minor Adverse.

### Sunlight

393. The sunlight assessment shows three of the sensitive residential receptors would experience a change in Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (Winter PSH). The impact on the three properties is outlined below.

### 2-4 Bulls Head Passage

394. A total of 9 rooms were assessed for sunlight within this building, of which 5 would meet the BRE Criteria for APSH and Winter PSH.

395. 4 rooms would see reductions in APSH from 20-29.9% which is considered Minor Adverse. Each of the rooms would retain between 16-18% APSH, which is considered good within a city centre location.
396. No reductions in Winter PSH would occur. The overall effect to sunlight at this property is considered Negligible.

#### The Grapes PH

397. A total of 4 rooms were assessed for impact on sunlight within this building, of which 1 would meet the BRE Guidelines. The residential unit is ancillary accommodation to the PH.
398. For APSH, three of the four rooms assessed would meet the BRE Guidelines and are considered to experience a Negligible effect. The remaining room sees a loss of 24% which is considered a Minor Adverse effect. However, this room would retain 19% APSH and is not affected in relation to sunlight during winter.
399. For Winter PSH, two of the four rooms assessed would meet the BRE Guidelines. Of the two rooms affected in the winter, one would experience an alteration in Winter PSH between 20-29.9% which is considered a Minor Adverse effect whilst one would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. Both rooms affected during winter have existing values below the 5% recommended in BRE Guidelines and therefore the percentage alteration is disproportionate to what the occupant is likely to experience. Additionally, both of these rooms would retain APSH levels in excess of 30% which is very good within an urban location.
400. Overall, the majority of windows comply with BRE Guidelines for APSH, with the one affected window retaining very good levels of APSH. The two windows affected for Winter PSH have low existing values whereby a percentage change is disproportionate. Therefore, the sunlight effect to this property is considered Minor Adverse.

#### The Swan PH

401. A total of 5 rooms were assessed within this building, of which 4 would meet the BRE Guidelines for both Annual and Winter PSH. The residential unit is ancillary accommodation to the PH.
402. For Annual PSH, all five rooms assessed would meet the BRE Guidelines and it is therefore considered to experience Negligible effect.
403. The room which is adversely affected is served by one window has a very low existing APSH level of 5%, well below the 25% recommended

in BRE Guidelines and therefore, despite the high percentage alteration, given the low existing APSH level, the loss is disproportionate to what would be perceptible to the occupant.

404. For Winter PSH, all rooms assessed would meet the BRE Guidelines and are considered to experience a Negligible effect.
405. Overall, given the very low existing APSH where a loss would be experienced, the effect to this property is considered Negligible.

#### Cumulative Impact

406. For daylight in the cumulative scenario, the following 10 properties were assessed: 4 Brabant Court, 9B Eastcheap, The Ship PH, The Grapes PH, Jamaica Buildings, St Michael Cornhill Church, St Edmund The King Church, St Clements Church, St Margaret Pattens Church and the Swan Tavern. Only 9B Eastcheap is considered to experience a Moderate Adverse cumulative effect. It should be noted that only bedrooms to the rear of the property are affected, which are considered less important in relation to alterations in daylight.
407. For sunlight, of the 8 properties assessed, The Grapes PH and Jamaica Buildings are considered to experience Moderate Adverse cumulative effects.
408. Overall the impact on sunlight and daylight to surrounding residential at 2-4 Bulls Head Passage, 4 Brabant Court and 9B Eastcheap would be Minor Adverse. It is not considered that the proposal would result in unacceptable harm to the amenity of surrounding land and buildings and will not reduce noticeably the daylight and sunlight available to nearby dwellings to unacceptable levels. The daylight and sunlight available will be sufficient and appropriate to context and provide acceptable living conditions. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with London Plan policy 7.6B, draft Publication London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

#### Overshadowing of amenity areas

409. BRE Guidelines recommend that for an external space to appear well lit, at least 50% of the area should receive at least 2 hours of sunlight on March 21<sup>st</sup>. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20% reduction) then the loss of sunlight is likely to be noticeable.

### Public Open spaces:

410. The potential overshadowing impacts of the proposed development has been assessed on 8 surrounding public amenity areas:
- St Michaels Cornhill Gardens;
  - St Peter-upon-Cornhill Church Garden;
  - Leadenhall Market;
  - St Helen's Bishopsgate Churchyard;
  - Bevis St Marks Synagogue Courtyard;
  - Sir John Cass's Foundation Primary School Playground;
  - Aldgate Square; and
  - Jubilee Gardens.
411. In assessing transient overshadowing, on 21<sup>st</sup> March, shadow is cast from the proposed development from 08:00GMT, which moves in a clockwise direction throughout the day. Between 13:00GMT and 16:00GMT the roof of Leadenhall Market is partially overshadowed by shadow cast from the proposed development. The remaining amenity areas are unaffected by shadow cast from the proposed development.
412. In assessing sun hours on the ground, all the amenity areas assessed would see no alteration from the percentage of total area which sees at least two hours of direct sunlight on March 21<sup>st</sup>, when comparing the baseline scenario with the proposed development scenario. Therefore, in accordance with the BRE Guidelines, each amenity is considered to experience no effect as a result of shadow cast from the proposed development.
413. When considering overshadowing arising as a result of cumulative impact the effect on 21<sup>st</sup> March is negligible. Except for shadow cast on the roof of Leadenhall Market, the amenity areas are unaffected on 21<sup>st</sup> June. None of the amenity areas will be affected on 21<sup>st</sup> December.
414. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area and therefore the impact would not cause unacceptable harm to the open amenity areas and complies with policies 7.6 and 7.7 of the London Plan, policy D6 of the draft Publication London Plan, DM10.7 of the Local Plan and DE8 of the emerging City Plan.

### Solar Glare

415. 66 locations have been identified in the ES as sensitive to solar glare within 1 km of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions, pedestrian crossings and railway lines at these locations.

416. The assessment concludes that the development would have no effect or a negligible effect on 44 of the locations. Of the remaining 22 locations there is a negligible effect on 5 locations. At the remaining 17 locations, based on a combination of criteria including angle of the solar reflection in relation to the road users' line of sight, the ability to deploy a visor in all cases other than the lowest angle reflections, the duration of the solar glare and the existence of alternative traffic signals at junctions enabling the road user to use different options, the effects of solar glare are assessed as being 'minor adverse'. The assessment in the environmental assessment concludes that no additional measures are required to mitigate the impact of solar glare. Officers consider that further consideration should be given to the issue of mitigation should planning permission be granted.
417. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with the London Plan, policy D9 of the draft Publication London Plan, Local Plan policy DM10.1 and draft City Plan 2036 policy DE8 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

#### Light Pollution

418. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
419. Potential light pollution impacts arising from the proposed development have been assessed in relation to 10 buildings which have been identified as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance.
420. The assessment shows that pre-curfew (before 11pm), the levels of light pollution would be limited and well within the 25-lux threshold set out within the ILP Guidance for all ten surrounding buildings assessed.
421. The post-curfew (after 11pm) assessment shows that the levels of light trespass would be below the 5-lux threshold set out within ILP Guidance at each of the sensitive surrounding receptors assessed. Light intrusion ranging from 0-0.35 lux, can be observed at The Swan PH, 39 Leadenhall Market, 4 Brabant Court and 9B Eastcheap, however these are considered Negligible. A condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and

external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

- 422. The remaining surrounding buildings would see no impact in relation to light intrusion and are considered to experience a Negligible effect.
- 423. The development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 and has been designed as to avoid light spill.

#### Air quality

- 424. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy 7.14 of the London Plan and policy SI of the draft Publication London Plan.
- 425. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.
- 426. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.
- 427. For the completed development the building would utilise a heat pump solution for zero emissions heating. The development would be car-free and the assessment states that the transport emissions associated with the servicing vehicles would have negligible impact. The assessment concludes that the development would have no significant impacts on air quality.
- 428. The development meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.

429. The City's Air Quality Officer has no objections and recommends that a condition is applied requiring the submission and approval of an Air Quality Report to detail how the finished development will minimise emissions and exposure to air polluting during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and the submitted Air Quality Assessment.
430. Subject to compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy 7.14 of the London Plan and policy SLI of draft Publication London Plan which all seek to improve air quality.

### Noise and Vibration

431. Local Plan 2015 policy DM15.7, London Plan policy 7.15 and draft Publication London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
432. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.
433. In most City redevelopment schemes the main noise and vibration issues occur during demolition and early construction phases. The Assessment identifies a Major Adverse (significant) impact on one sensitive receptor close to the site, The Ship PH. All other receptors are predicted to result in a Minor Adverse or Negligible effect (not significant).
434. Noise and vibration mitigation, including control over working hours and types of equipment to be used would be included in a Construction Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.
435. During the operational phase of the development, the Assessment concludes that there would be a negligible impact on noise levels from road traffic compared with the existing.

436. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.
437. The submitted noise assessment indicated that the requirements of these conditions can be satisfactorily met and consequently the proposals would comply with London Plan policy 7.15, draft London Plan policy D13, Local Plan policy Dm15.7 and draft City Plan 2036 policy HL3.

### Health Impact Assessment

438. The applicants have submitted a Health Impact Assessment which has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health, identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
  - Provision of high-quality, publicly accessible open space in the public viewing gallery encouraging physical activity and creating healthy working environments;
  - Provision of high-quality public realm at the ground floor improving the physical environment and contributing to social cohesion;
  - New north to south pedestrian route incorporating the site into its wider area, facilitating pedestrian access and alleviating demand on existing pedestrian routes;
  - A car-free development minimising vehicles travelling to the site;
  - Building design considering the context of the site and maximising benefits including employing system to reduce energy usage; and
  - Consideration to sustainability and inclusive design.
439. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:
- Implementation of a Construction Environmental Management Plan to minimise any environmental effects including dust (via Dust Management), noise and vibration;
  - Implementation of a Construction Logistics Plan to minimise the environmental and road traffic related impacts of the demolition and construction works;
  - Implementation of a Delivery and Servicing Management Plan setting out access, delivery times (overnight only) and booking system; and

- Implementation of a Framework Travel Plan to minimise vehicle trips – as the site has good access to public transport and active travel modes, the target focus is to maximise uptake of active travel options (walking and cycling).
440. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy 3.2 and draft London Plan policy GG3 and draft City Plan 2036 policy S1.

## **Sustainability & Energy**

### Energy and CO2 emissions

441. The Energy Statement accompanying the planning application demonstrates that the building has been designed to achieve a 47.2% improvement in carbon emissions compared with a Building Regulations compliant building. This would be achieved through a number of energy demand reduction measures. The applicant has since identified further improvements to improve the overall target to 58.5% targeted through adding PV on spandrels, a condition is proposed to require an updated Energy Statement to be submitted for assessment.
442. These include the use of passive design features such as achieving an enhanced thermal envelope performance and envelope airtightness by using a “closed cavity frame” façade system with high performance specifications relating to reducing solar gain and thermal bridging. Natural, operable ventilation slots have been incorporated to reduce the need for mechanical cooling. The passive design measures overall would achieve 30.2% carbon emissions savings.
443. The applicants consider that the proposed building cannot be connected to a district heating system, neither to an existing network due to its location, nor to a private heating network on site, due to the size of the development. However, heating and hot water can be provided by water source heat pumps that would contribute carbon emissions savings of 17%.
444. This energy strategy demonstrates compliance with the London Plan carbon targets. (London Plan Policy 5.2 and draft Publication London Plan S12). A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan

targets for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the draft Publication London Plan.

### BREEAM

445. A BREEAM pre-assessment (New Construction 2018) has been carried out for the proposed development. This demonstrates that the development can achieve a score of 89.41% which is within the "Outstanding" category.
446. The development's scores are high in the categories Energy, Materials and Pollution, three of the City's four priority categories, and would perform particularly well in the Transport and Waste sections.
447. Additionally, there are a number of credits that should be targeted to maintain the highest level of rating, relating to Management, Health & Wellbeing, Energy and Pollution. These include assessing options to ensure the energy efficiency is optimised as part of the passive design analysis and, to further address the pollution criteria considering the use of a compliant refrigerant leak detection system.
448. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A condition has been included requiring the submission of a post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating).

### Whole Life Carbon

449. The draft Publication London Plan requires applications referable to the Mayor to include a Whole Life-Cycle Carbon assessment against each lifecycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is

therefore an important tool to achieve the Mayor's net zero-carbon city target.

450. The submitted assessment has been carried out using a nationally recognised methodology. Following a refinement of the proposed building's materials and service life performance, the modelled embodied carbon emissions would remain below the GLA's benchmark emissions target. However, they would not meet the GLA's aspirational target of the more ambitious targets of the RIBA 2030 Climate Challenge for Net Zero Buildings and of the Leti (London Energy Transformation Initiative) roadmap to zero carbon buildings by 2030.
451. The following, most significant opportunity areas for reducing operational energy consumption have been identified going forward into the detailed design phase:
- Use of low carbon steel cement replacements for the concrete (e.g. Ground Granulated Blast-furnace Slag (GGBS) and fly-ash) which would reduce the total embodied carbon emissions for the development
  - Re-use of raised access flooring
  - Considering alternatives to terracotta façade elements
  - Using low carbon refrigerant gas and reduced leakage rate
  - Using low carbon materials for the internal elements and fit-out.
452. A strategy to achieve further reductions of Whole Life Cycle carbon emissions of the proposed development towards meeting more ambitious targets will be required by condition.

#### Circular Economy and Waste

453. Emerging New London Plan Policy S17 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Draft City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.
454. The Sustainability Statement describes how the building design can incorporate circularity principles and actions according to the 9 circularity principles in the GLA Circular Economy Guidance. These include designing to eliminate waste, including designing for longevity, flexibility of space, designing out construction, demolition, excavation and municipal waste arising, conserving resources, increasing efficiency and sustainable sourcing.
455. The Applicant reviewed opportunities to refurbish and extend the existing building to contribute to this growth, but the opportunities were limited by its existing structure. The close grid and existing

configuration preclude the opening up of the base of the building and the massing is bulbous, and a new podium can be more finely tuned to the scale and cornice lines of adjacent buildings. The configuration of floorplates is not suitable for flexible office space and creating additional floorspace above the existing building would further restrict the layout at ground floor level due to the need to introduce additional structure to support the new floors above. Additionally, a refurbishment scheme would not have provided key public benefits such as the passageway from Fenchurch Street to Ship Tavern Passage.

456. The applicants commit to undertaking a pre-demolition audit to determine the feasibility of refurbishment or reuse, and to identify the opportunities to re-use and recycle existing materials. They also commit to generating a Resource Management Plan to reduce the amount of construction waste.
457. The project commits to the targets of 95% diversion of demolition waste and 98% diversion of non-demolition waste from landfill.
458. A comprehensive package of further opportunities to incorporate circularity principles and actions has been submitted that includes:
  - Retaining the majority of the basement
  - Using recycled steel, concrete and other aggregates, including site-won material
  - Sourcing materials responsibly, minimising transport distances
  - Using highly efficient and durable mechanical, electrical and plumbing systems with easy access
  - Maximising natural ventilation and daylight ingress
  - Using high water efficiency systems
  - Using water collected through a sustainable drainage system for irrigation in the public realm
  - Incorporating building elements that are demountable and reusable
  - Designing flexible internal spaces.
459. A pre-commencement condition has been included requiring the submission of a detailed Circular Economy Statement, that provides details of how the building would adhere to the following circular economy principles: build in layers, design out waste, design for longevity, design for flexibility and adaptability, design for disassembly and using systems, elements or materials that can be re-used and recycled. The detailed Statement will be expected to meet the relevant targets set out in the GLA Circular Economy Guidance.

#### Flood Risk, Drainage and Climate Resilience

460. Local Plan 2015 policy CS18 seeks to “reduce the risk of flooding from surface water throughout the City, by ensuring the development

proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network”. The use of Sustainable Urban Drainage Systems (SUDs) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan.

461. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk). The proposed development will utilise SuDS techniques to attenuate rainfall and minimise run-off from the site. The following techniques are proposed: Rainwater harvesting, green/brown roof systems, blue roof systems, permeable paving, attenuation tank and flow controls.
462. The proposed Flood Risk and SuDS strategy would accord with policies CS18 of the Local Plan 2015, CR3 of the draft City Plan 2036, policies 5.12 and 5.13 of the London Plan and policies SI12 and 13 of the draft Publication London Plan.
463. The Lead Local Flood Authority and Thames Water have raised no objections to the proposals and have recommended conditions to be attached.
464. The Sustainability Statement sets out measures proposed to provide the development’s resilience to climate change. These have to address:
  - Avoiding overheating and solar gain in the building
  - Maximising the quality and quantity of urban greening to provide cooling and shading
  - Avoiding flooding and managing surface water run-off.
465. The proposed closed cavity facade system with high performance glazing, high thermal mass and external solar shading will prevent the proposed building from suffering from overheating.
466. The proposed development includes a range of green infrastructure measures such as green walls, podium and roof gardens and street trees that would contribute to cooling the building, resulting in an Urban Greening Factor of 0.35 that exceeds the GLA and the City of London’s requirements.
467. To effectively manage the water run off without the opportunity for integrating soakaways, the existing combined connection to the public sewer in Fenchurch is being used in combination with above ground and below ground attenuation tanks. Other Sustainable Drainage Systems, such as green or blue roofs and permeable paving are being considered to reduce pollution and the volume required within the attenuation structures.

468. Floor-by-floor plantrooms are able to introduce 25 percent greater BCO outside air, which allows for partial free cooling via an overhead VAV system. VAV systems are designed to use 10-degree Celsius supply of air to enable maximum free cooling. Cooling towers would generate 14degree Celsius water overnight and this water would be stored in concrete tanks in the basement, the evaporatively cooled water used 10 percent of the energy of an equivalent mechanical refrigeration system. Small chillers are provided for back-up and global warming in the event of extreme temperatures. This system provides 98 percent carbon emissions improvement over Part L notional building cooling system.

### **Security**

469. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police.
470. The site will be protected by a combination of façade resilience at the ground floor level of the building and HVM resistant bollards located at the building entrances. These would be on private land within the site.
471. Security checks and screening facilities for visitors prior to accessing the viewing galleries and public amenity areas will take place at ground level within a space prior to entry to the lifts.
472. Further details of the overall security strategy will be required by condition and a Visitor Management Plan will be required by S106 which will detail more specifically the measures to protect the viewing gallery.
473. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

### **Fire Statement**

474. A Fire statement has been submitted outlining the fire safety strategy for the building which has been developed in consultation with the City District Surveyor's office and the London Fire Brigade. The statement adequately covers the relevant fire aspects of the design and is adequate for the planning stage.

### **Planning Obligations**

475. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the

development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

476. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
477. From 1 April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. The change removes the Mayor's planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
478. CIL contributions and City of London Planning obligations are set out below:

#### MCIL2 Calculation

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution</b>	<b>Forwarded to the Mayor</b>	<b>Retained for administration and monitoring</b>
<b>MCIL2</b>	£8,183,262	£7,855,932	£327,330

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£3,365,250	£3,196,987	£168,263
<u>City Planning Obligations</u>			
Affordable Housing	£897,400	£888,426	£8,974
Local, Training, Skills and Job Brokerage	£134,610	£133,264	£1,346
Carbon Reduction	£0	£0	£0

Shortfall (as designed)			
Section 278 (Evaluation and Design)	£100,000	£100,000	£0
Security Measures (Eastern City Cluster)	£448,700	£448,700	£0
S106 Monitoring Charge	£4,750	£0	£4,750
Total liability in accordance with the City of London's policies	<b>£4,950,710</b>	<b>£4,767,377</b>	<b>£183,333</b>

### City Planning Obligations

479. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the test in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*Including Consolidation*)
- Service Vehicle Lift Maintenance Strategy
- Cycling Promotion Plan
- Legible London Contribution
- Cycling Improvements Contribution (J150,000) (*J15k Cycle Route Quality Criteria Study and J135k Improvement Works*)
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (CoL)
- Section 278 Agreement (*Transport for London – Gracechurch Street*)
- Public Route (*Specification & Access*)
- Public Viewing Gallery & Winter Garden – Levels 29/30 (*Access & Management Plan. To be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later*)
- Public Realm / Market Space (*Specification & Management Plan*)
- Cultural Implementation Strategy

- Television Interference Survey
- Wind Audit
- Solar Glare Audit

480. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary and enter into the S106 and S278 agreements.

481. The scope of S278 agreement may include, but is not limited to, highway/footway improvements to Fenchurch Street, Philpot Lane, Rood Lane, Ship Tavern Passage and Lime Street junction and tree planting.

#### Monitoring and Administrative Costs

482. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

483. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

#### Site Specific Mitigation

484. The City will apply CIL towards infrastructure to support the development of the City.

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

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

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

486. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would remove or minimise disadvantages suffered by persons who suffer from a disability and in

particular mobility impairment by providing enhanced and accessible public realm. It is also the view of officers that the provision of accessible floorspace and publicly accessible viewing gallery and winter garden would advance equality of opportunity.

### **Human Rights Act 1998**

487. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights (“ECHR”).
488. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City’s primary business and professional services function, outweighs the Minor Adverse impact and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.
489. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

### **Conclusions**

490. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Publication London Plan and the draft Local Plan and considering all other material considerations.
491. The Proposed Development comprises the demolition of an unremarkable and outmoded retail and office development and the replacement proposed delivers a high quality, office-led development in the emerging City Cluster, which will meet growing business needs,

supporting and strengthening opportunities for continued collaboration and clustering of businesses.

492. The scheme makes optimal use of the site, providing an attractive City tower, the Brancusi-influenced design comprised of three forms set above a robust podium would provide a significant increase in office floorspace in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals service centre.
493. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by publicly accessible commercial, cultural and permeable spaces adding vibrancy to the City's streets and benefitting the City's diverse communities.
494. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.
495. The scheme delivers significant public realm enhancement, including a generously proportioned north-south passageway through the site, connecting Fenchurch Street to the network of passageways and lanes connecting to Leadenhall Market. Further public realm enhancements to the south east fronting Fenchurch Street and Lime Street, creating a large permeable publicly accessible space within the site and delivering highways and public realm improvements to Lime Street including the planting of five trees. Further highways enhancements are proposed to Philpot Lane and two street trees are proposed on Rood Lane which would improve the appearance and pedestrian environment of the local area.
496. The increase in floorspace and occupation places extra pressure on the comfort and safety of the City's streets. The development achieves PCLS of B- and above other than on Lime Street, where the eastern footway will narrow to allow the western footway to widen so is considered acceptable.
497. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel
498. Objections have been received from statutory consultees and third parties, relating to the design of the development, its impact on designated and non-designated heritage assets and the impact on the

environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

499. The proposal would deliver a tall building on a suitable site in the Eastern Cluster and in the emerging City Cluster and on an identified Renewal Opportunity Site in accordance with Local Plan Policy CS14 and CS7, City Plan Policies S12 and S21, London Plan Policy 7.7 and draft Publication London Plan D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and draft Publication London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. Following rigorous assessment, it is concluded that the proposal would preserve the OUV/Significance, authenticity and integrity of the Town or London World Heritage Site, according with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.
500. The proposal would preserve the special interest/significance and setting of the Tower of London, Tower Bridge, Leadenhall Market, The Monument, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street, 7-8 Philpot Lane, Custom House, Billingsgate Market, Cannon Street Station Towers, St Mary-le-bow, Former Port of London Authority Building, Adelaide House, 1 Cornhill, Vincula Chapel and St Thomas' Tower. It is considered that the significance of the Tower of London, Bank, Eastcheap and Leadenhall Market Conservation Areas would be unharmed.
501. The proposals would not cause harm to the significance and setting of the Monument or Tower Bridge, the application proposals accord with London Plan policy 7.8, Local Plan policies CS12, DM12.1, DM12.3 and DM12.4, draft Publication London Plan policy HC1 and with the emerging City Plan policy HE1.
502. The proposals comply with the policies relating to strategic views, and the policies which seek to protect the Tower of London WHS.
503. The proposals comply with strategic objective 1 in the Local Plan and with the policies relating to offices and to economic growth.
504. The proposals conflict with policies which seek to prevent the loss of retail floorspace in Principal Shopping Centres.

505. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as the policies relating to tall buildings, heritage, design, and public realm are also complied with, that notwithstanding the conflict with the retail policies, the proposals comply with the development plan when considered as a whole.
506. The environmental impact of the development on the neighbouring buildings and spaces has been assessed. Adverse impacts have been identified on noise and vibration in the surrounding area and to nearby buildings, primarily during the construction phase.
507. The impact on daylight to surrounding residential at 2-4 Bulls Head Passage, 4 Brabant Court and 9B Eastcheap would be Minor Adverse. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the properties in the context of the location of the site in a dense urban area which is in the emerging City Cluster and on an identified Renewal Opportunity Site. As such, the extent of harm is not considered to be such as to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. In any event, it is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the Minor Adverse impact.
508. Negative impacts during construction would be controlled as far as possible by implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
509. Objections have been received from a nearby occupier of a commercial building, regarding the impact caused by the development on amenity and conditions to daylight and sunlight. This report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a

characteristic that often results in limited daylight and sunlight levels to those premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. It is considered that the proposal does not conflict with Local Plan Policy CS10.

510. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.
  
511. It is the view of officers that the proposal complies with the development plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached.

## **Background Papers**

### Internal

09.11.2020 Memo, Air Quality Officer  
11.11.2020 Memo, Contract and Drainage Service  
12.11.2020 Memo, Local Transport Planning  
24.11.2020 Memo, Lead Local Flood Authority  
30.11.2020 Memo, Environmental Health Officer  
17.12.2020 Memo, Access Team  
18.12.2020 Memo, Planning Obligations  
20.01.2021 Email, District Surveyors  
29.01.2021 Email, Access Team

### External

03.06.2020 Letter, Thames Water  
03.11.2020 Email, Environment Agency  
05.11.2020 Email, TfL (Crossrail Safeguarding)  
10.11.2020 Letter, London City Airport  
13.11.2020 Email, NATS Safeguarding  
16.11.2020 Email, Environment Agency  
18.11.2020 Email, Westminster Council  
19.11.2020 Letter, Historic England  
23.11.2020 Letter, Thames Water  
09.12.2020 Comment, Mrs Meghan Allen  
15.12.2020 Email, Thames Water  
18.12.2020 Letter, London Borough of Tower Hamlets  
19.12.2020 Email, Mann Vergan on behalf of residents of Flat A, B and C of  
4 Bulls Head Passage  
07.01.2021 Comment, Mann Vergan  
08.01.2021 Letter, NTR Planning Ltd  
08.01.2021 Comment, Emma Baylis  
13.01.2021 Letter, London Borough of Hackney  
13.01.2021 Email, Historic Royal Palaces  
13.01.2021 Letter, TRIUM  
15.01.2021 Letter, DP9  
20.01.2021 Letter, Environment Agency  
21.01.2021 Letter, Trium  
26.01.2021 Comment, Will Ryan  
26.01.2021 Letter, London Borough of Hackney  
29.01.2021 Email, Alasdair Buckle, DP9  
01.02.2021 Letter, Greater London Authority  
01.02.2021 Email, Civil Aviation Authority  
02.02.2021 Email, Alasdair Buckle, DP9  
03.02.2021 Email, Deborah Ewenla, TfL

### Documents

BREEAM Pre-assessment, eb7, 11<sup>th</sup> January  
Contamination Assessment Report, RMA  
Covering Letter, DP9  
Design and Access Statement, KPF, January 2021

Environmental Statement Volume 1, Trium  
Environmental Statement Volume 2, Citidesigner  
Environmental Statement Volume 3, Trium  
Environmental Statement Non-Technical Summary, Trium  
Energy Statement, DSA  
Fire Statement, ARUP Fire  
Flood Risk Assessment and Drainage Strategy, RGB  
Health Impact Assessment, Quod  
Landscape & Public Realm Strategy, Spacehub  
Outline Demolition and Construction Environmental Management Plan, AIA  
Planning Statement Rev 1, DP9  
Preliminary Ecological Appraisal, TEC  
Schedule of Drawings, Kohn Pedersen Fox  
Smart Infrastructure & Utilities Statement, DSA  
Statement of Community Involvement, Field Consulting  
Sustainability Statement, TFT  
Healthy Streets Transport Assessment, Momentum  
Wind Microclimate – Supplementary Information, RWDI  
Daylight and Sunlight Addendum, GIA, 13<sup>th</sup> January 2021  
Additional information Project Forum, Spacehub, Momentum and RWDI, 11<sup>th</sup>  
November 2020  
Technical Note, Momentum Transport Consultancy, 15<sup>th</sup> and 21<sup>st</sup> January  
2021  
Design Queries – Retail, KPF, January 2021  
Design and Accessibility Queries, KPF, January 2021  
Design Queries: Way finding porous screen, KPF, January 2021  
Urban Greening Factor, Spacehub, 12<sup>th</sup> January 2021  
Embodied Carbon Technical Briefing Note, TFT, 18<sup>th</sup> December 2020  
Applicants Response to Planning Application Representations, DP9, 15<sup>th</sup>  
January 2021  
Clarifications Report in Response to GLA Stage 1 Report, Citydesigner, 2<sup>nd</sup>  
February 2021  
Technical Note response to TfL, Momentum Transport Consultancy, 1<sup>st</sup>  
February 2021

#### Drawing Numbers

PA-019 1:250@A1, Existing Basement Levels 03, 02, 01 and Lower Ground  
Plans  
PA-020 1:250@A1, Existing Ground Floor Plan  
PA-021 Rev 01 1:250@A1, Existing Level 01, 01 Mezz., 02 and 03 Plan  
PA-024 1:250@A1, Existing Levels 04, 05, 06 and 07 Plan  
PA-028 1:250@A1, Existing Level 08 and Roof Plan  
PA-030 1:250@A1, Existing North and South Elevation  
PA-031 1:250@A1, Existing East and West Elevation

## **Appendix A**

### **REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS**

#### **Reasoned Conclusions**

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that the Environmental Statement refers to uses defined under the categories of the Town and Country Planning (Use Classes) Order 1987. The description of development refers to the same types of uses but as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses. Therefore, it is stated that the City of London need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and public terrace uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide:

- 72,992 sq.m. gea of office floorspace (Class E);
- 1,823 sq.m. gea flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis.))
- 1,566 sq.m sui generis public viewing gallery and winter garden with ancillary space

REASON: To ensure the development is carried out in accordance with the approved plans

2. The areas within the development marked as retail on the floorplans hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

3. The areas shown on the approved drawings as offices, flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) and public viewing gallery and garden with ancillary space, and as set out in Condition 62 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

### **Monitoring Measures**

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Vehicle Lift Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures to the Public Garden terrace. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The

duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

## **Appendix B** **London Plan Policies**

The following policies from the London Plan (2016) are considered relevant:

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

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

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

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

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;  
Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;  
Promote London as a suitable location for European and other international agencies and businesses.

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

Policy 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.

Policy 4.5 Support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision.

Policy 4.6 Support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.

Policy 4.8 Support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need

and the broader objectives of the spatial structure of this Plan, especially town centres.

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

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

Policy 5.5 (Decentralised Energy Networks) Development proposals should prioritise connections to existing or planned decentralised energy networks where feasible.

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

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

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

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

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

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

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

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

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

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:  
ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles  
provide parking for disabled people in line with Table 6.2  
meet the minimum cycle parking standards set out in Table 6.3  
provide for the needs of businesses for delivery and servicing.

Policy 7.1 Development should be designed so that the layout, tenure, mix of uses interface with surrounding land will improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

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

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

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

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

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

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

h meet the principles of inclusive design

i optimise the potential of sites.

Policy 7.7 Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in this policy.

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

Policy 7.10 Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value.

Policy 7.12 New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.

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

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

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

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

#### **Relevant draft Publication London Plan Policies.**

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)

- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

**Relevant GLA Supplementary Planning Guidance (SPG):**

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);

- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

### **Relevant Draft City Plan 2036 Policies**

S1 Healthy and inclusive city  
 HL1 Inclusive buildings and spaces  
 HL2 Air quality  
 HL3 Noise and light pollution  
 HL4 Contaminated land and water quality  
 HL6 Public toilets  
 Policy HL9 Health Impact Assessments  
 S2 Safe and Secure City  
 SA1 Crowded Places  
 SA3 Designing in security  
 HS3 Residential environment  
 S4 Offices  
 OF1 Office development  
 S5 Retailing  
 RE2 Retail links  
 S6 Culture, Visitors and the Night -time Economy  
 CV2 Provision of Visitor Facilities  
 CV5 Public Art  
 S7 Smart Infrastructure and Utilities  
 S8 Design  
 DE1 Sustainability requirements  
 DE2 New development  
 DE3 Public realm  
 DE5 Terraces and viewing galleries  
 DE6 Shopfronts  
 DE8 Daylight and sunlight  
 DE9 Lighting  
 S9 Vehicular transport and servicing  
 VT1 The impacts of development on transport  
 VT2 Freight and servicing  
 Policy VT3 Vehicle Parking  
 S10 Active travel and healthy streets  
 AT1 Pedestrian movement  
 AT2 Active travel including cycling  
 AT3 Cycle parking  
 S11 Historic environment  
 HE1 Managing change to heritage assets  
 HE2 Ancient monuments and archaeology  
 HE3 Setting of the Tower of London World Heritage Site  
 S12 Tall Buildings  
 S13 Protected Views  
 S14 Open spaces and green infrastructure  
 OS1 Protection and Provision of Open Spaces

OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S15 Climate resilience and flood risk  
CR1 Overheating and Urban Heat Island effect  
CR3 Sustainable drainage systems (SuDS)  
S16 Circular economy and waste  
CE1 Zero Waste City  
S21 City Cluster  
S27 Planning contributions

### **Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

- Air Quality SPD (July 2017);
- Archaeology and Development Guidance SPD (July 2017);
- City Lighting Strategy (October 2018);
- City Transport Strategy (May 2019);
- City Waste Strategy 2013-2020 (January 2014);
- Protected Views SPD (January 2012);
- City of London's Wind Microclimate Guidelines (2019);
- Planning Obligations SPD (July 2014);
- Open Space Strategy (2016);
- Office Use SPD (2015);
- City Public Realm (2016);
- Cultural Strategy 2018 – 2022 (2018).
- Eastcheap Conservation Area Character Summary and Management Strategy SPD 2013
- Leadenhall Market Conservation Area Character Summary and Management Strategy SPD 2017
- Bank Conservation Area Character Summary and Management Strategy SPD2012

### **Relevant Local Plan Policies**

#### ***CS1 Provide additional offices***

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

#### ***CS2 Facilitate utilities infrastructure***

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

***CS3 Ensure security from crime/terrorism***

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

***CS4 Seek planning contributions***

To manage the impact of development, seeking appropriate developer contributions.

***CS10 Promote high quality environment***

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

***CS11 Encourage art, heritage and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

***CS13 Protect/enhance significant views***

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

***CS14 Tall buildings in suitable places***

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

***CS15 Creation of sustainable development***

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

### ***CS16 Improving transport and travel***

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

### ***CS17 Minimising and managing waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

### ***CS19 Improve open space and biodiversity***

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

### ***CS20 Improve retail facilities***

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

### ***CS21 Protect and provide housing***

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

### ***CS22 Maximise community facilities***

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

### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

### ***DM1.5 Mixed uses in commercial areas***

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

### ***DM2.1 Infrastructure provision***

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe

subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

### ***DM3.2 Security measures***

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***DM3.3 Crowded places***

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

### ***DM3.4 Traffic management***

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

### ***DM3.5 Night-time entertainment***

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

### ***DM10.1 New development***

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

#### ***DM10.2 Design of green roofs and walls***

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

#### ***DM10.3 Roof gardens and terraces***

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

#### ***DM10.4 Environmental enhancement***

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces.

Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

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

#### ***DM10.7 Daylight and sunlight***

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

#### ***DM10.8 Access and inclusive design***

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

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

- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### ***DM11.2 Public Art***

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

### ***DM12.1 Change affecting heritage assets***

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

### ***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

### ***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

### ***DM12.4 Archaeology***

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

### ***DM15.1 Sustainability requirements***

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;
  - b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

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

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

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

#### ***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

#### ***DM15.5 Climate change resilience***

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

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

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

### ***DM15.7 Noise and light pollution***

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

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

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

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

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

### ***DM16.1 Transport impacts of development***

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

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

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

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;  
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

### ***DM16.3 Cycle parking***

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

#### ***DM16.4 Encouraging active travel***

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

#### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

### ***DM17.1 Provision for waste***

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

### ***DM17.2 Designing out construction waste***

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood

Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

- a) be publicly accessible where feasible; this may be achieved through a legal agreement;
- b) provide a high quality environment;
- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

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

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

### ***DM20.1 Principal Shopping Centres***

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

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

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

### ***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:

- a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
- b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- b) in locations which are convenient to the communities they serve;
- c) in or near identified residential areas, providing their amenity is safeguarded;
- d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

#### Relevant Local Plan Policies

##### ***CS1 Provide additional offices***

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

##### ***CS2 Facilitate utilities infrastructure***

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

##### ***CS3 Ensure security from crime/terrorism***

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

##### ***CS4 Seek planning contributions***

To manage the impact of development, seeking appropriate developer contributions.

##### ***CS10 Promote high quality environment***

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

##### ***CS11 Encourage art, heritage and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

### ***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

### ***CS13 Protect/enhance significant views***

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

### ***CS14 Tall buildings in suitable places***

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

### ***CS15 Creation of sustainable development***

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

### ***CS16 Improving transport and travel***

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

### ***CS17 Minimising and managing waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

### ***CS19 Improve open space and biodiversity***

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

### ***CS20 Improve retail facilities***

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

### ***CS21 Protect and provide housing***

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

### ***CS22 Maximise community facilities***

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

### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

### ***DM1.5 Mixed uses in commercial areas***

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

### ***DM2.1 Infrastructure provision***

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

### ***DM3.2 Security measures***

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;

- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***DM3.3 Crowded places***

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

### ***DM3.4 Traffic management***

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

### ***DM3.5 Night-time entertainment***

- 1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
  - b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

### ***DM10.1 New development***

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

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

### ***DM10.2 Design of green roofs and walls***

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

### ***DM10.3 Roof gardens and terraces***

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

### ***DM10.4 Environmental enhancement***

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

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

- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

#### ***DM10.7 Daylight and sunlight***

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

#### ***DM10.8 Access and inclusive design***

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

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

#### ***DM12.1 Change affecting heritage assets***

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

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### ***DM12.2 Development in conservation areas***

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

### ***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

### ***DM12.4 Archaeology***

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

### ***DM15.1 Sustainability requirements***

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

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;
  - b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

#### ***DM15.2 Energy and CO2 emissions***

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

#### ***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes

should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

#### ***DM15.4 Offsetting carbon emissions***

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

#### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

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

#### ***DM15.7 Noise and light pollution***

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

### ***DM16.1 Transport impacts of development***

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
  - a) road dangers;
  - b) pedestrian environment and movement;
  - c) cycling infrastructure provision;
  - d) public transport;
  - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
  - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
  - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

### ***DM16.3 Cycle parking***

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

### ***DM16.4 Encouraging active travel***

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

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

#### ***DM17.1 Provision for waste***

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

#### ***DM17.2 Designing out construction waste***

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

#### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

- b) the benefits of the development outweigh the flood risk to future occupants;
- c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- a) all sites within the City Flood Risk Area as shown on the Policies Map; and
- b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;
  - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - d) have regard to biodiversity and the creation of green corridors;
  - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

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

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

### ***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
  - a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
  - b) the contribution the unit makes to the function and character of the PSC;
  - c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking

establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

### ***DM21.3 Residential environment***

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

### ***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:
  - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- b) in locations which are convenient to the communities they serve;
- c) in or near identified residential areas, providing their amenity is safeguarded;
- d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

## SCHEDULE

APPLICATION: 20/00816/FULEIA

**70 Gracechurch Street London EC3V 0HR**

**Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Prior to any stripping-out or demolition of the existing building, a material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.  
REASON : To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: Draft London Plan ; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.
- 3 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that confirms that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance, and that provides the final details on how the building would adhere to circular economy principles: build in layers, design out waste, design for longevity, design for flexibility and adaptability, design for disassembly and using systems, elements or

materials that can be re-used and recycled. The development shall be carried out in accordance with the approved details.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan; D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

- 4 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, confirming that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and providing calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan: D3, SI 2, SI 7 - Local Plan: CS17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to

satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 6 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.  
REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 7 Prior to the commencement of development, an updated Energy Assessment demonstrating the improvements in carbon emissions from the building is required to be submitted to and approved by the Local Planning Authority.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 8 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 during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.  
REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace
- 9 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 10 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction

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

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 12 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related

Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

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

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 14 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 15 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 16 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 17 The development shall incorporate such measures as are necessary within the site to resist structural damage and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.  
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 18 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m<sup>3</sup>;

(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; and

(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

19 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, its aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required, and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

20 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

21 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in

order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 22 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
  - (b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration;
  - (c) details of canopies;
  - (d) typical masonry details, including jointing and any necessary expansion/movement joints;
  - (e) details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;
  - (f) details of semi-internal elevations fronting the ground floor public routes;
  - (g) full details of the Public viewing gallery and winter garden, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
  - (h) details of soffits, hand rails and balustrades, including those soffits in the semi-external areas of the podium between ground and garden level
  - (i) details all party wall treatments;
  - (j) details of junctions with adjoining premises;
  - (k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
  - (l) details of all drainage and irrigation;
  - (m) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level;
  - (n) details of the legible London wayfinding sign and porous wind mitigation screen within the new north/south route; and
  - (o) details of the improvement works at the junction of Lime Street and Fenchurch Street.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 23 Before the works thereby affected are begun, sample panels of agreed sections of the masonry facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 24 All unbuilt surfaces, including the podium, terraces, balconies, roof terrace, tenant garden, undercroft, new public route and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of:
- a) Irrigation;
  - b) Provision for harvesting rainwater run-off from road to supplement irrigation;
  - c) Spot heights for ground levels around planting pit;
  - d) Soil;
  - e) Planting pit size and construction;
  - f) Tree guards; and
  - g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.

to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 25 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 26 Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall

be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 27 Details of the construction, including detailed drawings, growing media, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 28 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.  
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 29 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036

- 30 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E and sui generis) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place and retained for the life of the building.  
REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
- 31 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.  
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 32 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.  
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
- 33 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.  
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

- 34 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.  
REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.
- 35 Once the building construction is completed and prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the post-completion report in line with the criteria set out in the GLA's Circular Economy Statement Guidance that shall be approved in writing by the Local Planning Authority, and that confirms the targets and actual outcomes achieved, clearly indicates where and why any variation has occurred and provides a summary of important lessons learned.  
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
- 36 Before any retail units are occupied the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) A signage strategy for the retail units within the development shall be submitted;  
(b) The signage relating to the public viewing gallery and winter garden shall also be included within the overall strategy.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.
- 37 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.  
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.  
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 38 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.  
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
- 39 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.  
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 40 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.  
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 41 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or a minimum rating of 'Excellent' as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 42 A post construction Whole Life Cycle Carbon assessment to demonstrate actual whole life cycle carbon emissions savings in accordance with the Mayor of London's guidance on Whole Life Cycle

Carbon Assessments shall be submitted to the Local Planning Authority and the Greater London Authority 3 months after practical completion.

REASON: To demonstrate that Whole Life Cycle carbon emissions have been minimised and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: Draft London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1.

- 43 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 1,002 long stay pedal cycle spaces, and a minimum of 28 short stay pedal cycle spaces, including for a minimum of 3 cargo bikes. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

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

- 44 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.

- 45 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.

REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and Intend to Publish London Plan policy: T5

- 46 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 100 showers and 700 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

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

- 47 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.  
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
- 48 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.  
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 49 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.  
  
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
- 50 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.  
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 51 No servicing of the premises shall be carried out between the hours of 07:00 and 23:00 on Monday to Sunday. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.  
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.
- 52 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.  
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 53 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety

- 54 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.  
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 55 The one car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.  
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, Draft Local Plan: VT3, London Plan: 6.13D and 6A.2 and Intend to Publish London Plan: T6.5.
- 56 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 57 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.  
REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 58 The roof terraces on level 31 and 33 hereby permitted shall not be used or accessed between the hours of 00.00 hrs (Midnight) on one day and 08.00 hrs on the following day, other than in the case of emergency.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 59 No amplified or other music shall be played on the roof terraces.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 60 No live or recorded music that can be heard outside the premises shall be played.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 61 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 62 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.  
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 63 The areas within the development marked as retail on the floorplans at ground and basement level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.
- 64 Unless otherwise approved in writing by the Local Planning Authority, no more than 50% of the areas marked as retail on the floorplans hereby approved shall be occupied as Food and Beverage uses.  
REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and of the emerging policies of the City Local Plan: S5, RE2.
- 65 The areas shown on the approved drawings above ground floor as offices, flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) and public viewing gallery and winter garden with ancillary space, and as set out in Condition 63 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).  
REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those

assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

- 66 The development shall provide:
- 72,992 sq.m. gea of office floorspace (Class E);
  - 1,823 sq.m. gea flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis.)); and
  - 1,566 sq.m gea sui generis public viewing gallery and winter garden with ancillary space.
- REASON: To ensure the development is carried out in accordance with the approved plans.

- 67 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:
- PA-006 1:1250@A1, Site Location Plan
  - PA-007 1:1250@A1, Land Ownership Plan
  - PA-008 1:500@A1, Ground Floor Block Plan
  - PA-039 1:250@A1 Basement Level 03, 02, 01 and Lower Ground Demolition Plans
  - PA-040 1:250@A1 Ground Floor Demolition Plan
  - PA-041 REV 01 1:250@A1, Level 01, 01 Mezz., 02 and 03 Demolition Plan
  - PA-044 1:250@A1, Levels 04, 05, 06 and 07 Demolition Plan, PA-048 1:250@A1, Level 08 and Roof Demolition Plan
  - PA-050 1:250@A1, North and South Demolition Elevations
  - PA-051 1:250@A1, East and West Demolition Elevations
  - PA-096 1:250@A1, Proposed Basement 2, B1, LG and LGM Plans
  - PA-100 REV 01 1:250@A1, Proposed Ground Floor Plan
  - PA-101 REV 01 1:250@A1, Proposed Level 01, 02, 03 and 04 Plan
  - PA-105 REV 01 1:250@A1, Proposed Level 05, 06, 07 and 08 Plan
  - PA-109 1:250@A1, Proposed Level 09-10, 11, 12 and 13-14 Plan
  - PA-115 1:250@A1, Proposed Level 15-24, 25, 26 & 27 Plan
  - PA-128 1:250@A1, Proposed Level 28, 29, 30 and 31 Plan
  - PA-132 1:250@A1, Proposed Level 32, 33 and High Level Plant
  - PA-135 1:250@A1, Proposed Roof Plan
  - PA-200 1:250@A1, Proposed North and South Context Elevations
  - PA-201 1:250@A1, Proposed East and West Context Elevations
  - PA-220 1:250@A1, Proposed North Elevation
  - PA-221 1:250@A1, Proposed South Elevation
  - PA-222 1:250@A1, Proposed East Elevation
  - PA-223 1:250@A1, Proposed West Elevation
  - PA-250 1:250@A1, Proposed Section AA
  - PA-251 1:250@A1, Proposed Section BB
  - PA-252 1:250@A1, Proposed Section CC
  - PA-253 1:250@A1, Proposed Section DD
  - PA-254 1:250@A1, Proposed Section EE
  - PA-255 1:250@A1, Proposed Section FF
  - PA-310 1:1250@A1, Proposed Podium Levels East

PA-311 1:50@A1, Proposed Podium Levels Façade South  
 PA-312 1:50@A1, Proposed Podium Levels East Wall  
 PA-313 1:50@A1, Proposed Podium Levels Arcade  
 PA-320 1:50@A1, Proposed High Levels Façade West East  
 PA-321 1:50@A1, Proposed High Levels Façade North South  
 PA-322 1:50@A1, Proposed High Levels Façade Plant  
 8305-PL-GA-103 1:125@A1, General Arrangement Landscaped and  
 Public Realm - Roof Plan  
 8305-SE-GA-201 1:50@A1, Section - Lime Street  
 8305-DE-SD-501 1:25@A1, Typical Soft Details - Southern Façade  
 8305-DE-SD-502 1:25@A1, Typical Soft Details - Northern Façade  
 8305-PL-GA-101 1:250@A1, General Arrangement Landscape and  
 Public Realm - Ground Floor  
 8305-PL-GA-102 1:125@A1, General Arrangement Landscape and  
 Public Realm - Levels 04, 05 and 06  
 8305-SE-GA-202 1:50@A1, Section - Rood Lane and PA-002  
 1:250@A1, Section Cut and  
 Elevation Marker Key Plan.

## INFORMATIVES

- 1 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.
  - to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;
  - aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;
  - or where the procurement of goods and services is contracted out
  - ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at

[http://www.cityoflondon.gov.uk/Corporation/LGNL\\_Services/Environment\\_and\\_planning/Planning](http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning)

Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email [city.procurement@cityoflondon.gov.uk](mailto:city.procurement@cityoflondon.gov.uk)

- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

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

Office #185 sq.m  
Retail #165 sq.m  
Hotel #140 sq.m  
All other uses #80 per sq.m

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

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

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

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: [www.planningportal.gov.uk/cil](http://www.planningportal.gov.uk/cil)).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 3 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking

solutions to problems arising in dealing with planning applications in the following ways:

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

a full pre application advice service has been offered;

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

- 4 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 5 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 6 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.
- 7 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 8 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 9 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
  - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.

(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Connections to the local sewerage and surface water system.

(g) Carriageway crossovers.

(h) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

10 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of

Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

(j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(k) The control of noise from plant and equipment;

(l) Methods of odour control.

11 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise,

dust etc. The code can be accessed through the City of London internet site, [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk), via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)

Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

#### Air Quality

(e)

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

#### Boilers and CHP plant

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO<sub>x</sub> emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO<sub>x</sub> technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

#### Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

#### Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

#### Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer

vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

#### Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

- 12 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 13 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 14 The investigation and risk assessment referred to in condition \*\*\*\* must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and

approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

- (i) a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
  - human health,
  - property (existing or proposed) including buildings, open spaces, service lines and pipes,
  - adjoining land,
  - groundwaters and surface waters,
  - ecological systems,
  - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

- 15 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:  
London Fire Brigade, Fire Prevention Branch  
5-6 City Forum  
City Road  
London EC1N 2NY

(b) Public houses, wine bars, etc.  
City of London Corporation  
Trading Standards and Veterinary Service  
PO Box 270  
Guildhall  
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)  
London Fire Brigade, Petroleum Department  
5-6 City Forum  
City Road  
London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships  
Transport for London  
Windsor House  
42-50 Victoria Street  
London, SW1H 0TL

(e) Works affecting a GLA road:  
Borough Integration and Partnerships  
Transport for London  
Windsor House  
42-50 Victoria Street  
London, SW1H 0TL

- 16 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.
- 17 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 18 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.
- Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.
- 19 All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating and The City of London Corporation as Planning Authority requests early discussion with the Applicant should it appear that the rating is likely to fall below outstanding.