

## **Background Papers**

### External

- 16.11.2020 Email, Environment Agency
- 19.11.2020 Letter, Historic England
- 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 26.01.2021 Letter, London Borough of Hackney
- 13.01.2021 Email, Historic Royal Palaces
- 15.01.2021 Letter, DP9 response to representations and technical note
- 20.01.2021 Email, Environment Agency
- 21.01.2021 email, City of Westminster
- 26.01.2021 Comment, Will Ryan
- 01.02.2021 Letter, Greater London Authority

**From:** [Gagen, Kurt](#)  
**To:** [DBE - PLN Support](#)  
**Subject:** FW: Planning Application Consultation: 20/00816/FULEIA  
**Date:** 19 November 2020 17:30:19  
**Attachments:** [image001.png](#)

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**From:** HNL Sustainable Places <[HNLSustainablePlaces@environment-agency.gov.uk](mailto:HNLSustainablePlaces@environment-agency.gov.uk)>  
**Sent:** 16 November 2020 17:39  
**To:** Gagen, Kurt <[Kurt.Gagen@cityoflondon.gov.uk](mailto:Kurt.Gagen@cityoflondon.gov.uk)>  
**Subject:** RE: Planning Application Consultation: 20/00816/FULEIA

Hi Kurt,

Apologies for my mistake. Thanks for getting back to us to check but we still have no comments.

Thanks

George

---

**From:** Gagen, Kurt [<mailto:Kurt.Gagen@cityoflondon.gov.uk>]  
**Sent:** 16 November 2020 17:08  
**To:** HNL Sustainable Places <[HNLSustainablePlaces@environment-agency.gov.uk](mailto:HNLSustainablePlaces@environment-agency.gov.uk)>  
**Subject:** RE: Planning Application Consultation: 20/00816/FULEIA

Dear George,

It is not a scoping opinion you have been consulted on. It is a planning application. Do you wish to make any comments?

Kind regards,  
Kurt

**Kurt Gagen**  
**Senior Planning Officer**  
**Department of the Built Environment**  
**City of London**

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**M: 07710 761826**  
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Dear Kurt Gagen

Thank you for consulting us on the EIA scoping opinion for the proposed redevelopment of 70 Gracechurch Street. Given the location and the lack of environmental constraints within our current remit, we have no comments to make on this application.

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

Best wishes,

George Lloyd

Sustainable Places Planning Advisor

Environment Agency - Hertfordshire & North London

2 Marsham Street, 3rd floor, London, SW1P 4DF

Email: [HNLsustainablePlaces@environment-agency.gov.uk](mailto:HNLsustainablePlaces@environment-agency.gov.uk)

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Mr Kurt Gagen  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3774  
Our ref: P01297730  
19 November 2020

Dear Mr Gagen

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

**70 GRACECHURCH STREET, LONDON, EC3V 0HR  
Application No. 20/00816/FULEIA**

Thank you for your letter of 13 October 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Historic England has no objection to the principle of replacing the existing building on the site, but we are concerned about the proposed tall building's wider impacts on the significance of London's historic environment, in particular the Tower of London WHS, St Paul's Cathedral and Leadenhall Market.

Our principal concern is about the harm that the replacement building would cause to the Tower of London by appearing in views from within the Inner Ward and increasing the amount of modern development competing with the historic buildings visible within the Tower's setting. We are also concerned 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 have a negative effect on the market's future sustainability.

Given the exceptional significance of the Tower, evident in its designation as a World Heritage Site, and the great weight that must be given to its conservation by the National Planning Framework and in strongly-worded policies in the London Plans, we recommend that permission should not be granted unless you are 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.

In weighing harm against public benefits in the manner required by paragraph 196 of the NPPF, you would also need to ensure that the potential for achieving heritage



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benefits through this scheme has been maximised and is capable of being fully realised, in particular through enhancements to the adjacent Grade II\* listed Leadenhall Market.

## Historic England Advice

### *Significance*

The development site is not within a conservation area, and the existing building on the site from the early 2000s is of no architectural or historic interest. It is a solid and impenetrable building which has its principal frontage onto Gracechurch Street and so turns its back to the adjacent Grade II\* listed Leadenhall Market.

However, because of its height and scale, the proposed tall building at No. 70 Gracechurch Street would have impacts on designated heritage assets well beyond the development site, in particular on the Tower of London (World Heritage Site; various listings and a scheduled monument).

The Tower is a monument of exceptional historic and architectural importance, and has dominated London since the 11<sup>th</sup> century. It is a fortress and palace, prison and execution site, barracks and tourist attraction which, at its centre, includes the finest and most intact example of a Norman keep in Europe (the White Tower).

The Tower has a historic relationship with the City of London, visually set apart from it. Maintaining this relationship is integral to safeguarding its landmark setting and sense of physical dominance, attributes of the Tower's Outstanding Universal Value.

From some views upstream at Waterloo Bridge, the proposals could have an impact on St. Paul's Cathedral, Wren's masterpiece and one of the most significant baroque buildings in England. The Cathedral appears prominently in the view from Waterloo Bridge, with its monumental dome the main focus of this part of the City as Wren intended. The City Cluster appears in the background to the right, but is currently distinct enough from the cathedral to enable some visual separation.

The site is adjacent 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 well preserved interior, but on the exterior it is surrounded by tall buildings of the modern City of London.

### *The Proposals and their Impact*

The proposals are for the demolition of the existing building and its replacement with a new office building comprised of three linked forms of 140m, 147m and 155m AOD



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above a podium that would provide a new permeable route to Leadenhall Market. The building would be framed in terracotta with variable glazed openings, and terrace levels are planted. A public viewing gallery would be provided at the top of the lowest of the three towers.

Due to the height of the proposed building, it would have an impact on the settings of designated heritage assets further afield. The impact is assessed in detail below in those views which are particularly sensitive to potential heritage impacts. This assessment has been informed by the London Advisory Committee following the presentation by applicants on 30 June 2020 and the subsequent meeting on 2 July.

The impact of the proposed development on the Tower of London would harm its significance and outstanding universal value. The degree of harm would be modest.

**View 10A Tower of London: Inner Wall/East of Wakefield Tower** is a view from within the Inner Ward of the Tower of London towards the historic group of buildings that make up the Queen's House. The City Cluster noticeably intrudes into the enclosed space. In particular, the tall building at No. 20 Fenchurch Street rises above the historic group, dominating it and creating an incongruous visual relationship between the two.

The proposed new building would appear as a sliver of development mostly concealed by, and lower than, the existing building at 20 Fenchurch Street. In this case, the harm to the significance of the Tower of London through an increase of modern development in its backdrop would be slight, but the status of the Tower as a World Heritage Site means that preserving its significance must be given the greatest possible weight.

**View 10C Tower of London: Inner Ward - North-west corner of the White Tower** is a view towards the Chapel of St. Peter ad Vincula and the Victorian barracks block. The tall building at No. 20 Fenchurch Street rises above the roofline of the chapel.

As in View 10A, the proposed new building will appear as a sliver of new development alongside the 20 Fenchurch Street. The proposal would slightly increase the amount of modern development appearing in the backdrop of the chapel. The overall form and extent of the cluster, and its visual relationship with the Tower, would not change substantially. The proposals would cause a modest degree of additional harm to its significance.

The proposals would also have an impact on the form and scale of the City Cluster, particularly in **View 42 LVMF 15B.2 Waterloo Bridge Downstream at the centre of the bridge**. St. Paul's is the Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development





in the City Cluster should be of an appropriate height and of high architectural design quality.

A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right.

The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an ‘outlier’ further to the right. The visual tension created by the cluster in this view of St Paul’s Cathedral and on the wider character of the City is likely to increase as the mass of the cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral. This will be an important consideration for the City for this and any future applications affecting the scale and mass of the cluster.

The site is not within a conservation area, but it is close to the Grade II\* listed Leadenhall Market. The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as a loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability.

#### *Relevant Law and Policy*

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving listed buildings or their settings.

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of ‘sustainable development’ where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 190 that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal.





Paragraph 193 states that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give ‘great weight’ to preserving the asset’s significance, and the more important the asset, the greater the weight should be. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional.

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. The phrase “less than substantial harm” describes all harm that is not “substantial”. This encompasses a wide range of possible harm. A finding of any harm is a consideration to which the decision-maker must give “considerable importance and weight” and “less than substantial harm” in NPPF terms does not imply “a less than substantial objection”

If the harm is deemed to be less than substantial, paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

Both the 2016 London Plan and draft New London Plan (2019) have a robust policy position to protect London’s World Heritage Sites. The draft New London Plan has been through its Examination in Public, with the policies referenced here supported by the Panel, meaning significant weight should be afforded to them.

Draft policy HC2 of the New London Plan reinforces the protection provided to them in the current London Plan, stating that “development proposals in WHSs and their settings ... should conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes.”

The City of London’s Policy CS12: Historic Environment, seeks the “safeguarding [of] the City’s listed buildings and their settings” and “Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value...of the Tower of London World Heritage Site.” Policy CS13: Protected Views, aims “to protect and enhance significant City and London views of important buildings, townscape and skylines...by...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV.”

From its introduction onwards the World Heritage Site Management Plan is clear that “the greatest challenge to the World Heritage Site... remains the impact on its setting of development and tall buildings.” It describes the Tower’s setting in detail in section 2.4. Key elements of the Tower’s setting that are sensitive for the management of its OUV are highlighted in paragraphs 7.3.17-18 and 7.3.27, namely the potential of new development to change the relative scale of the Tower in views, and the degree to which the Tower’s relationship with the cluster can be understood by the sky space around the White Tower.





### *Position*

The proposed new building at No. 70 Gracechurch Street would, along with consented but as yet unbuilt developments, fill the visual gap between the tall building at No. 20 Fenchurch Street and the main part of the City Cluster with built form and increase the Cluster's overall density. The prominence of the proposal at No. 70 Gracechurch Street and its consequent high potential to affect a high concentration of important heritage assets and the wider historic character of the City, demands a very high quality design response to its context.

We question whether the proposed design is of such quality. Its massing, the relationship between podium and upper levels, and the relationship between the proposed building and its surroundings, and particularly Leadenhall Market all give grounds for thinking otherwise.

The impacts identified above would, in the language of the NPPF, cause less than substantial harm to a designated heritage asset of the highest possible significance. The Tower's status as a World Heritage Site means that it is a heritage asset of the highest significance and that the greatest possible weight should be given to its conservation. It also means that you should ensure that the applicants have submitted a Heritage Impact Statement that is in line with ICOMOS guidance.

You will know that local authorities are required to seek to avoid or minimise harm (paragraph 190), and be confident that any remaining harm has been clearly and convincingly justified (paragraph 193, NPPF).

We advise you to treat very seriously both this individual harm, and the incremental cumulative impact of successive City Cluster proposals, on the significance of the Tower when weighing the harm against public benefits in the manner required by the NPPF.

Therefore, permission should not be granted unless you are 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 (paragraph 196, NPPF).

We 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. We acknowledge that better accessibility to the adjacent Grade II\* listed Leadenhall Market also has the potential to improve its setting.

There may also be the opportunity for its current use to be supported by



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complementary uses, which would be a public benefit, but we advise you to ensure that you are satisfied that the proposals would not inadvertently undermine the market's sustainability.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We are particularly concerned about the quality of the design as a part of the Cluster, which impacts on the heritage context, and the effect of this design specifically in the setting of the Tower, and the effect on the daylighting of Leadenhall Market.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 190, 193 and 196 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

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

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

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Michael Dunn**

Principal Inspector of Historic Buildings and Areas



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**Director of the Built Environment**

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**PLACE**

Tel 020 7364 5009

[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

18 December 2020

Dear Kurt Gagen,

**CITY OF LONDON REF:** 20/00816/FULEIA

**TOWER HAMLETS REF:** PA/20/02319

**ADDRESS:** 70 Gracechurch Street London EC3V 0HR

**PROPOSAL:** 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.

(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,566sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).

**INTRODUCTION**

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

The advice contained within this letter sets out the Council's assessment and conclusions which will inform the response to the request for observations.



**Tower Hamlets Council**  
Town Hall  
Mulberry Place  
5 Clove Crescent  
E14 2BG

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## PROPOSED DEVELOPMENT

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

## HERITAGE

### Location

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

The proposed development raises some concerns about the degree of visual separation between the eastern cluster and the Tower of London. The proposed development is a tall building in terms of the City of London's planning policy (in excess of 70m AOD).

### The Tower of London World Heritage Site

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

The International Council on Monuments and Sites (ICOMOS) advised in their consultation response to the refused application for a 305.3m AOD tall building (serving as a visitor attraction) at land adjacent to 20 Bury Street in the City of London (GLA/4868/02 and City of London ref: 18/01213/FULEIA) (dated March 2019), the following:

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



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The London Borough of Tower Hamlets concurs with the assertion that the Tower of London WHS has already reached its limit in terms of visual intrusion and expresses concern about the continuing and seemingly iterative process of diminishing the expanse of clear sky in backdrop views of the WHS

#### View 10A – Tower of London: Inner Wall, East of Wakefield Tower

Within this view, The City Cluster intrudes into the enclosed space. In this view, the tall building at No. 20 Fenchurch Street (The 'Walkie Talkie') rises above the historic group. The proposed development would appear partially on its right-hand side at a lower height than 20 Fenchurch Street. The harm to this view would be minimal.

#### View 10B – Tower of London: Inner Ward, West of The White Tower 2

Within this view, 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 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.

#### View 10C – Tower of London: Inner Ward, North-west corner of the White Tower

The proposed development would not be visible within this view.

#### View 10D – Tower of London: Inner Wall, West of Bowyer Tower

Within this view, The City Cluster is seen rising above the Grade II\* Listed One Trinity Square. The submitted Heritage, Townscape and Visual Impact Assessment by Trium states that the proposals '*effectively reduces the singularity of No.20 Fenchurch Street and contributes to the process of closing the gap between it and the principal Cluster*'.

The process of 'closing the gap' is not supported by ICOMOS who, as set out above, have previously stated, in the context of new tall buildings within the City of London, that '*The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact*'.

It should be noted The London Borough of Tower Hamlets objected to the now consented development at 50 Fenchurch Street (City of London ref: 19/01307/FULEIA). This development is for a 35-storey building outside of the City Cluster. 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. This would also run contrary to the plan-led approach to modelling the cluster and its impacts on the WHS set out in the City's Local Plan and emerging Local Plan. As such, the proposal would cause some harm in this view.

### Strategic views

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

The relevant LVMF views have been provided which would affect the Tower of London WHS. LVMF view 10A.1 would be affected very minorly, with only a sliver of the proposed development seen to the right-hand side of 20 Fenchurch Street. LVMF view 25A.1 would also be very minorly affected, with only a sliver of the proposed development seen to the left-hand side of 20 Fenchurch Street.

### CONCLUSIONS

The proposed development would begin to fill the visual gap between 20 Fenchurch Street and the recognised expanse of the City Cluster. 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 WHS.

Yours sincerely,

**Adam Garcia**

Principal Planning Officer (West Area Team)

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



Cc:

Subject:

Date:

70 Gracechurch Street - 20/00816/FULEIA  
19 December 2020 11:34:30

---

Dear Madam, Dear Sir,

I am writing in regards to the planning application 20/00816/FULEIA for a development at 70 Gracechurch Street.

I represent a residential building at 4 Bulls Head Passage, EC3V 1LU, and am representing the three respective owners in the block:

Flat A: Mann Vergan (on my behalf)

Flat B: Emma Baylis

Flat C: William Ryan

We are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.

I would like to make a representation that the residents are against this new development, as it will impact our quality of life.

Can you inform us what steps we need to take in order to further this complaint.

If you have any queries please do not hesitate contacting me.

Thanking you in advance.

Best wishes,

Mann Vergan  
Lawyer\*

[REDACTED]

[REDACTED] & Wales, BVI, New York and Massachusetts

# **Comments for Planning Application 20/00816/FULEIA**

## **Application Summary**

Application Number: 20/00816/FULEIA

Address: 70 Gracechurch Street London EC3V 0HR

Proposal: 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.|cr|REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). |cr|(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).|cr|The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Case Officer: Kurt Gagen

## **Customer Details**

Name: Mr Mann Vergan

Address: 4 Bulls Head Passage Flat A London

## **Comment Details**

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:Dear Madam, Dear Sir,

I am writing in regards to the planning application 20/00816/FULEIA for a development at 70 Gracechurch Street.

I represent a residential building at 4 Bulls Head Passage, EC3V 1LU, and am representing the three respective owners in the block:

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I would like to make a representation that the residents are against this new development, as it will impact our quality of life.

Can you inform us what steps we need to take in order to further this complaint.

If you have any queries please do not hesitate contacting me.

Thanking you in advance.

Best wishes,

Mann Vergan  
Lawyer\*

[REDACTED]  
\*admitted in England & Wales, BVI, New York and Massachusetts



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3798/NTR/MEG

8<sup>th</sup> January 2021

Department of the Built Environment  
City of London  
PO Box 270  
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London EC2P 2EJ  
For the attention of Kurt Gagen

Dear Kurt

**Re: Representations in relation to Planning Application ref. 20/00816/FULEIA**  
**At: 70 Gracechurch Street, London EC3V 0HR**

I am writing on behalf of our clients, Property Class England 3 GmbH & Co. KG (owners of Allianz House, no. 60 Gracechurch Street) to make representations in relation to the above application. Our clients object to this application on grounds that insufficient information has been submitted to enable the application to be determined at this time.

**Growth/Renewal and Impact on Future Development Potential**

The redevelopment of no. 70 Gracechurch Street must be considered in context. Any redevelopment must have regard to form, function and structure of an area and the scale, mass and orientation of surrounding buildings (London Plan policy 7.4). The building currently proposed at no. 70 is of a vastly different scale and character to the local context - in particular in relation to our client's premises at no. 60 Gracechurch Street, which are directly opposite and linked in function, use and townscape character. It is acknowledged that no. 70 Gracechurch Street is within an allocation growth area, however emerging plan policy confirms the need to consider the impact on the wider area by extending the 'Cluster' allocation to the south so that it includes no. 60 Gracechurch Street (emerging plan policy S21). In addition, the emerging plan identifies both no. 70 and no. 60 Gracechurch Street as a Renewal Opportunity sites, where growth, including tall buildings is focused. The development of no. 70 cannot be considered in isolation, when it sits directly opposite a site which has also been specifically identified as a renewal site earmarked for the delivery of large scale development and appropriate for 'tall buildings'. Any redevelopment proposal must clearly demonstrate that there would be no

adverse impact on the future development potential of no. 60 Gracechurch Street, so that emerging policy ambitions may be fulfilled. The emerging plan recognises the importance of the site, further emphasising the importance of considering the two sites together, or as part of a masterplan.

#### The Principle of Development

Our clients do not object to the principle of the redevelopment of this site but seek further information to demonstrate that this development will not hinder the future development potential of no. 60 Gracechurch Street. Our client's property is an important corner plot directly opposite the application site, with clear linkages in terms of use (designated 'Principle Shopping Centre' frontage along both sides of Gracechurch and Fenchurch Street) and built form and the renewal and regeneration of both sites must be considered together.

#### Design

The potential for tall buildings in this City Cluster/Renewal Opportunity Area is acknowledged, however the scale of development, as currently proposed, does not accord with that of the surrounding area. Local Plan design policy CS10 confirms that the bulk, height, scale and massing and detailed design of buildings must be appropriate to character, amenity and setting and the proposal must therefore relate to the existing built form. If a tall building is to be considered it must have due regard to opportunities for redevelopment of a similar scale at no. 60. Good design principles would focus height and mass towards corner locations (such as this) and the applicants must demonstrate that future opportunities as envisaged in the emerging plan, are not hindered.

You will be aware that the adjoining neighbour (no. 55 Gracechurch Street) to the immediate south of no. 60 Gracechurch Street, is also subject to a live planning application for a tall building (planning application ref. 20/00671/FULEIA). The cumulative impact of the two development's, which are 29 and 33 storey's respectively, either side of a modest building, would clearly be significant. The applicants have not sufficiently considered this cumulative impact to confirm no adverse impact.

#### Amenity of existing occupiers

No. 60 Gracechurch Street is currently occupied with retail uses at ground floor and offices above. The existing tenants have an ongoing lease agreement and have no plans to vacate. London plan (policy 7.6) and local plan policy (CS14), as well as emerging London plan policy D9 and Local Plan policy S12 confirm that tall buildings will only be acceptable where there is no adverse impact on the amenity of their surroundings. The redevelopment of no. 70 Gracechurch Street has the potential to have an adverse impact on the amenities of existing occupiers on



grounds of potential loss of daylight/sunlight. The applicants have not explored these impacts fully, such that we can be satisfied that there would be no adverse impact.

Heritage

The application site is in close proximity to two conservation areas (Eastcheap and Leadenhall conservation areas) and a number of listed buildings, including the Grade 1\* listed Monument and the Tower of London World Heritage Site. London plan policy 7.8 and Local Plan policy CS7 seek to protect Heritage assets and are clear that proposals for tall buildings must conserve heritage assets and their settings. The impact of the development in this unique heritage context and its effect on daylighting to Leadenhall Market has been identified as a cause for concern by Historic England, who have requested that these matters should be fully addressed. We are concerned that any consideration in advance of satisfactory resolution of these issues would be premature.

In the light of the above, we respectfully request that this application is deferred, to allow the applicants to fully consider the implications of the redevelopment in the wider context, in particular, the impact on the future development potential of number 60 Gracechurch Street, the impact on the amenities of existing occupiers of the building and the unique heritage context within which it sits.

We would be grateful to receive confirmation of receipt of this correspondence and to be informed of progress with this application hereafter.

Yours sincerely

A large black rectangular box used to redact a handwritten signature.

**Meghan Allen**  
Associate  
**NTR Planning**  
A smaller black rectangular box used to redact a title or position name.

# **Comments for Planning Application 20/00816/FULEIA**

## **Application Summary**

Application Number: 20/00816/FULEIA

Address: 70 Gracechurch Street London EC3V 0HR

Proposal: 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.|cr|REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). |cr|(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).|cr|The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Case Officer: Kurt Gagen

## **Customer Details**

Name: Miss Emma Baylis

Address: 17 Vinegar Street London

## **Comment Details**

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:I am the owner of Flat B, 4 Bull's Head Passage, EC3V 1LU and alongside my fellow flat owners at Flats A and C we are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.

I would like to make a representation that the residents are against this new development, as it will impact our quality of life.



Hackney Council  
Planning Services  
2 Hillman Street  
London E8 1FB  
[www.hackney.gov.uk](http://www.hackney.gov.uk)  
Hackney Reference:2020/3341

Mr Bhakti Depala  
Po Box 270, Guildhall, London Ec2p 2ej

13-01-2021

EC2P 2EJ  
EC2P 2EJ

**Dear Sir/Madam**

**Town and Country Planning Act 1990 (as amended)**  
**Town and Country Planning (Development Management Procedure) (England) Order 2015**

**Application Number:** 2020/3341

**Site Address:** 70 Gracechurch Street London Ec3v 0hr , London, EC3V 0HR

**Development Description:** Notification from the City of London of application 20/00816/FULEIA for the 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.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to [planning@hackney.gov.uk](mailto:planning@hackney.gov.uk), or by phone to 020 8356 8062.

Yours sincerely

**Natalie Broughton**

**Head of Planning and Building Control  
Neighbourhoods and Housing**

□

**PLANNING DECISION NOTICE**

**Town and Country Planning (Development Management Procedure) (England) Order 2015**

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<b>Agent:</b> Bhakti Depala	<b>Applicant:</b> Bhakti Depala
Po Box 270, Guildhall, London Ec2p 2ej	Po Box 270, Guildhall, London Ec2p 2ej
Ec2p 2ej	Ec2p 2ej
EC2P 2EJ	EC2P 2EJ

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Part 1- Particulars of the Application	<b>Application No:</b>	2020/3341
	<b>Date of Application:</b>	02-11-2020
	<b>Date Validated:</b>	
	<b>Application Type:</b>	Adjoining Borough Observations

**Proposal:** Notification from the City of London of application 20/00816/FULEIA for the 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.

**Location:** 70 Gracechurch Street, London, EC3V 0HR

---

Part 2 – Particulars of Decision: **No Objection**

**Date of Decision:** 13-01-2021

Yours sincerely



**Natalie Broughton**

**Head of Planning and Building Control  
Neighbourhoods and Housing**

□





Hackney Council  
Planning Services  
2 Hillman Street  
London E8 1FB  
[www.hackney.gov.uk](http://www.hackney.gov.uk)  
Hackney Reference:2021/0176

Kurt Gagen

26-01-2021

Dear Sir/Madam

**Town and Country Planning Act 1990 (as amended)**  
**Town and Country Planning (Development Management Procedure) (England) Order 2015**

**Application Number:** 2021/0176

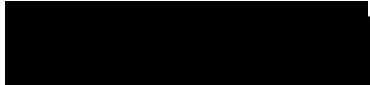
**Site Address:** 70 Gracechurch Street London EC3V 0HR

**Development Description:** Notification from the City of London of revised application ref: 20/00816/FULEIA for the 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.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to [planning@hackney.gov.uk](mailto:planning@hackney.gov.uk), or by phone to 020 8356 8062.

Yours sincerely



**Natalie Broughton**

**Head of Planning and Building Control  
Neighbourhoods and Housing**

□

## PLANNING DECISION NOTICE

7Town and Country Planning (Development Management Procedure) (England) Order 2015

**Agent:** Kurt Gagen

**Applicant:** C/O Agent

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Part 1- Particulars of the Application

**Application No:** 2021/0176

**Date of Application:** 13-01-2021

**Date Validated:**

**Application Type:** Adjoining Borough Observations

**Proposal:** Notification from the City of London of revised application ref: 20/00816/FULEIA for the 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.

**Location:** 70 Gracechurch Street London EC3V 0HR

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**Plan Numbers:**

Part 2 – Particulars of Decision: **No Objection**

**Date of Decision:** 26-01-2021

Yours sincerely



**Natalie Broughton**

**Head of Planning and Building Control  
Neighbourhoods and Housing**

□



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**From:** Adrian Phillips <[REDACTED]>  
**Sent:** 13 January 2021 09:24  
**To:** Gagen, Kurt [REDACTED]  
**Subject:** RE: 70 Gracechurch Street Consultation 20/00816/FULEIA

Dear Kurt

Thank you for contacting me. The impact of this development on the OUV of the Tower we have judged as not causing substantial harm, so are not objecting to the application in this instance.

Kind Regards

Adrian Phillips

**Director of Palaces & Collections**



---

**From:** Gagen, Kurt <[Kurt](#)>  
**Sent:** 12 January 2021 18:47  
**To:** Adrian Phillips <[REDACTED]>  
**Cc:** Joyce, Maureen [REDACTED]>  
**Subject:** 70 Gracechurch Street Consultation 20/00816/FULEIA

Dear Mr Phillips

I am the Case Officer dealing with the abovementioned site.

Historic Royal Palaces was consulted on the abovementioned application on 02.11.2020 and to date we have not received a response, which is unusual so I wanted to make contact with you.

Can you confirm if you are planning on making representations? The application is being

reported to 16<sup>th</sup> February Planning and Transportation Committee.

Kind regards,  
Kurt

**Kurt Gagen**  
**Senior Planning Officer**  
**Department of the Built Environment**  
**City of London**



[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)



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Historic Royal Palaces is a registered charity (No 1068852), correspondence details, Hampton Court Palace, Surrey KT8 9AU Historic Royal Palaces Enterprises Ltd, a company registered in England (No 3418583) registered office Hampton Court Palace, Surrey KT8 9AU.



70 Gracechurch Street

**Applicant's Response to Planning Application Representations**

Application ref: 20/00816/FULEIA

Advanced Idea Holdings Limited

**DP9 Limited**

DP9 Ltd  
100 Pall Mall

London

SW1Y 5NQ  
Tel: 020 7004 1700  
Fax: 020 7004 1790

## 1. INTRODUCTION

- 1.1 This Report is prepared by DP9 in response to representations submitted to the City of London's public consultation on current planning application ref: 20/00816/FULEIA.
- 1.2 The purpose of this Report is to identify and address all individual comments contained within the representations, with a view to demonstrating the acceptability of the planning application proposals and alleviating any concerns contained within representations. It is worth noting that this response is issued further to a set of additional planning application documentation including amended proposed drawings, some of which is subject to a re-consultation exercise. Additional and amended documentation is referred to where of relevance.
- 1.3 This Report has been prepared with input of the following professional consultants who form part of the applicant's consultant team:
  - **Kohn Pederson Fox;**
  - **Spacehub** (landscape architects);
  - **Trium Environmental** (EIA coordinators);

- **Citydesigner** (heritage and townscape consultants);
- **Momentum** (transport consultants);
- **RWDI and Wirth** (wind consultants);
- **GIA** (daylight, sunlight, overshadowing and solar glare consultants).

1.4 For each representation, the Report extracts all substantive comments (shown in italics) and queries and provides an answer to each.

## 2. OVERVIEW OF REPRESENTATIONS

- 2.1. All representations received to date are set out in Table 1. Parties that have submitted representations have been set into the following categories, which correspond to the sections of this Report:
- a) **Public bodies;**
  - b) **Other bodies; and**
  - c) **Neighbouring and nearby landowners.**

*Table 1 – overview of consultation responses*

Date	Submitted by	Type
05/11/2020	TfL Crossrail Safeguarding	Public body
10/11/2020	London City Airport	Other body
13/11/2020	NATS Safeguarding	Other body
16/11/2020	Environment Agency	Public body
18/11/2020	Westminster City Council	Public body
19/11/2020	Historic England	Public body

18/12/2020	London Borough of Tower Hamlets	Public body
07/01/2021	Mr Mann Vergan on behalf of 4 Bulls Head Passage	Neighbouring landowner
08/01/2021	Ms Emma Baylis on behalf of 4B Bulls Head Passage	Neighbouring landowner
08/01/2021	Allianz House, 60 Gracechurch Street	Neighbouring landowner

### 3. PUBLIC BODY REPRESENTATIONS

#### TfL Crossrail Safeguarding

Comment ref	Comment	Response
<b>TFLCS1</b>	<i>No Comment – land outside of TfL's Crossrail Safeguarding area.</i>	No response

#### Environment Agency

Comment ref	Comment	Response
<b>EA1</b>	<i>No Comments on the proposal following review.</i>	No response

#### Westminster City Council

Comment ref	Comment	Response
<b>WCC1</b>	<i>No Comments on the proposal following review.</i>	No response

Historic England

Comment ref	Comment	Response
HE1	<p><b>Summary:</b></p> <p><i>Historic England has no objection to the principle of replacing the existing building on the site, but we are concerned about the proposed tall building's wider impacts on the significance of London's historic environment, in particular the Tower of London WHS, St Paul's Cathedral and Leadenhall Market.</i></p> <p><i>Our principal concern is about the harm that the replacement building would cause to the Tower of London by appearing in views from within the Inner Ward and increasing the amount of modern development competing with the historic buildings visible within the Tower's setting. We are also concerned 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 have a negative effect on the market's future sustainability.</i></p>	Responses to specific matters raised here are set out in more detail in HE2 to HE11 below.

	<p><i>Given the exceptional significance of the Tower, evident in its designation as a World Heritage Site, and the great weight that must be given to its conservation by the National Planning Framework and in strongly-worded policies in the London Plans, we recommend that permission should not be granted unless you are 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.</i></p> <p><i>In weighing harm against public benefits in the manner required by paragraph 196 of the NPPF, you would also need to ensure that the potential for achieving heritage benefits through this scheme has been maximised and is capable of being fully realised, in particular through enhancements to the adjacent Grade II* listed Leadenhall Market.</i></p>	
HE2	<p><i>The impact of the proposed development on the Tower of London would harm its significance and outstanding universal value. The degree of harm would be modest.</i></p>	<p>The proposed scheme is within the defined policy area of the Eastern Cluster, which is accepted as a contrasting, but high quality group of buildings in the wider setting of the Tower of London WHS. The proposals would be a minor addition to the existing and emerging Cluster, its high architectural quality making it a worthy addition. In a number of views, it ameliorates</p>

		<p>the singular powerful form of 20 Fenchurch Street. Its addition to the Cluster is therefore not considered to cause any harm to the significance or OUV of the WHS.</p> <p>As part of pre-application consultations, Historic Royal Palaces stated that they had no objections to the proposed design.</p> <p>Further analysis is provided in: Chapter 8 (section A, pages 36 to 43) and Chapter 10 (Views 7 to 9 and 10A to 10D) of the HTVIA.</p>
HE3	<p><b><i>View 10A Tower of London: Inner Wall/East of Wakefield Tower</i></b> is a view from within the Inner Ward of the Tower of London towards the historic group of buildings that make up the Queen's House. The City Cluster noticeably intrudes into the enclosed space. In particular, the tall building at No. 20 Fenchurch Street rises above the historic group, dominating it and creating an incongruous visual relationship between the two.</p> <p>The proposed new building would appear as a sliver of development mostly concealed by, and lower than, the existing building at 20 Fenchurch Street. In this case, the harm to the significance of the Tower of London through an increase of modern</p>	<p>The minor visibility of the proposed scheme in this specific view, with only a “sliver” of the proposed building visible next to 20 Fenchurch Street makes it a comparatively small addition in the wider setting and backdrop of the WHS. This minor addition in the view, of a building of high architectural quality, is not considered to harm the significance of the WHS or the ability to appreciate it. The OUV of the WHS is unaffected.</p> <p>Further analysis is provided in: Chapter 8 (section A, pages 36 to 43) and Chapter 10 (Views 7 to 9 and 10A to 10D) of the HTVIA.</p>

	<i>development in its backdrop would be slight, but the status of the Tower as a World Heritage Site means that preserving its significance must be given the greatest possible weight.</i>	
HE4	<p><b><i>View 10C Tower of London: Inner Ward - North-west corner of the White Tower</i></b> is a view towards the Chapel of St. Peter ad Vincula and the Victorian barracks block. The tall building at No. 20 Fenchurch Street rises above the roofline of the chapel.</p> <p>As in View 10A, the proposed new building will appear as a sliver of new development alongside the 20 Fenchurch Street. The proposal would slightly increase the amount of modern development appearing in the backdrop of the chapel. The overall form and extent of the cluster, and its visual relationship with the Tower, would not change substantially. The proposals would cause a modest degree of additional harm to its significance.</p>	<p>In View 10C, the proposed scheme is not visible.</p> <p>In View 10B, which we believe is the view HE is actually referring to, only a very small part of the proposed scheme will be visible in the backdrop of the base of the bell tower of the Grade I listed Chapel of St Peter ad Vincula, leaving the lantern bell-cote unaffected. The very limited visibility of the proposed scheme, in the context of the existing setting of contemporary, high quality tall buildings, would not affect the prominence of the listed Chapel in this view. There is therefore no harm to the significance of the listed building or the OUV of the WHS as a whole.</p> <p>Further analysis is provided in: Chapter 8 (section A, pages 36 to 43) and Chapter 10 (Views 7 to 9 and 10A to 10D) of the HTVIA.</p>
HE5	<p>The proposals would also have an impact on the form and scale of the City Cluster, particularly in <b><i>View 42 LVMF 15B.2 Waterloo Bridge Downstream at the centre of the bridge</i></b>. St. Paul's is the</p>	<p>In LVMF 15B.2 (View 42 of the HTVIA), the proposals add a new, high quality building to the southern part of the Eastern Cluster. It complies with the requirements of the management guidance listed in HE's comment i.e., it</p>

	<p><i>Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development in the City Cluster should be of an appropriate height and of high architectural design quality.</i></p>	<p>does not dominate the Cathedral or compromise its relationship with the clear sky around. The building is of an appropriate height in relation to the other buildings of the Eastern Cluster and is considered to be of high architectural design quality.</p> <p>Further analysis is provided in: Chapter 6, Chapter 8 (section B, pages 46 to 47) and Chapter 10 (Views 42 and 43) of the HTVIA.</p>
HE6	<p><i>A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right.</i></p> <p><i>The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an ‘outlier’ further to the right. The visual tension created by the cluster in this view of St Paul’s Cathedral and on the wider character of the City is likely to increase as the mass of the</i></p>	<p>The proposed scheme does not reduce the distinction between the Cathedral and the Eastern Cluster. In fact, it improves the visual relationship between them.</p> <p>In these views, where the interplay between St Paul’s Cathedral and the Eastern Cluster is traditionally enjoyed, the historic duality of the two has been disrupted by No.20 Fenchurch Street, effectively introducing a third element, which is exacerbated by its form with a figurative front and back so that it appears to ‘lean away’ from the Cluster, towards the south. This perception of ‘three elements’ is made more disruptive by No.20 Fenchurch Street appearing to be the same height as St Paul’s from this angle. This means that a symmetrical composition occurs, with its axis being the Cluster with its three central and largest buildings, both</p>

	<p><i>cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral. This will be an important consideration for the City for this and any future applications affecting the scale and mass of the cluster.</i></p>	<p>under construction and consented, flanked by two singular objects, St Paul's to the left and No.20 Fenchurch Street to the right, effectively paired as 'outliers' from the group. This is not an acceptable form for the skyline, as the dominance of St Paul's Cathedral as a standalone object of great importance is diminished by its regrettable visual pairing with No.20 Fenchurch Street. The proposed development rectifies this damaging condition by closing the gap between the Eastern Cluster and No.20 Fenchurch Street which enhances the Cathedral's relationship with the Cluster as a whole.</p> <p>Further analysis is provided in: Chapter 8 (section B, pages 46 to 47) and Chapter 10 (Views 42 and 43) of the HTVIA.</p>
HE7	<p><i>The site is not within a conservation area, but it is close to the Grade II* listed Leadenhall Market. The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as a</i></p>	<p>It is noted that HE acknowledges that the proposed scheme "would not fundamentally change the visual appearance of the setting" of the Grade II* listed Leadenhall Market.</p> <p>Leadenhall Market is highly enclosed (with both a roof/truss and brise soleil blocking sunlight where partially glazed) and therefore there is limited opportunity for overshadowing impact.</p>

	<i>loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability.</i>	
HE8	<i>The proposed new building at No. 70 Gracechurch Street would, along with consented but as yet unbuilt developments, fill the visual gap between the tall building at No. 20 Fenchurch Street and the main part of the City Cluster with built form and increase the Cluster's overall density. The prominence of the proposal at No. 70 Gracechurch Street and its consequent high potential to affect a high concentration of important heritage assets and the wider historic character of the City, demands a very high quality design response to its context.</i>	The design of the proposed scheme has been carefully developed in order to respond to its prominent location at the corner of Gracechurch Street and Fenchurch Street, in relation to surrounding heritage assets, and in relation to existing and consented Cluster buildings. In response to the fine grain of the adjacent conservation areas, and as part of the setting of highly graded listed buildings, the proposed design has a richly detailed podium level of varying heights which relates better to the street wall than the existing building. The tripartite sculptural form of the tower rising from the podium adds a high quality element to the setting of heritage assets and adds richness to medium and long distance views of the Cluster. A new publicly accessible north-south route at ground level, which incorporates compatible uses, connects to the historic Ship Tavern Passage and improves the pedestrian connectivity to the Grade II* listed Leadenhall Market from Fenchurch Street. There are proposed improvements to the public realm on Lime Street that include extending the existing shared surface down to Fenchurch Street, with new yorkstone paving extending into the 'Forum Halls',

		<p>widened pavements and the planting of street trees along Lime Street. All of these attributes of the proposed scheme, in particular its exemplary architectural quality, improved connectivity and public realm, make a positive contribution to the settings of nearby heritage assets, the local townscape character and the City's skyline.</p> <p>Further analysis is provided in: Chapter 6 of the HTVIA.</p>
HE9	<p><i>We question whether the proposed design is of such quality. Its massing, the relationship between podium and upper levels, and the relationship between the proposed building and its surroundings, and particularly Leadenhall Market all give grounds for thinking otherwise.</i></p>	<p>This comment doesn't make clear or give further details on why the aspects of the proposed scheme listed in this paragraph do not meet the high quality criteria referred to in HE8. The architects' DAS and Chapter 6 of the HTVIA set out in detail the rationale and evolution of the tripartite form of the proposed design, the relationship of the upper levels to the base, and how the base relates in height, expression and materiality to its context, including the nearby conservation areas. With regard to the Grade II* listed Leadenhall Market, HE consider that there is no harm to its setting (HE 7 above) and that the new connection from the south, improvements to the public realm and complementary uses at ground level have the potential to improve its setting (HE11 below).</p>
HE10	<p><i>The impacts identified above would, in the language of the NPPF, cause less than substantial</i></p>	<p>The HTVIA assessment on the Tower of London (chapter 8, section A) follows the stepped 'assessment</p>

	<p><i>harm to a designated heritage asset of the highest possible significance. The Tower's status as a World Heritage Site means that it is a heritage asset of the highest significance and that the greatest possible weight should be given to its conservation. It also means that you should ensure that the applicants have submitted a Heritage Impact Statement that is in line with ICOMOS guidance.</i></p>	<p>framework' set out in the Mayor of London's World Heritage Sites Guidance on Settings SPG 2012, which is in line with ICOMOS guidance. This is confirmed in paragraph 5.2 of the SPG, "<i>This framework is based on ICOMOS guidance on undertaking Heritage Impact Assessments for World Heritage Sites and has been adapted for use in the UK context.</i>"</p> <p>The detailed assessments in Chapter 8, section A of the HTVIA conclude that there is no harm to the significance or the OUV of the WHS.</p>
<b>HE11</b>	<p><i>We 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. We acknowledge that better accessibility to the adjacent Grade II* listed Leadenhall Market also has the potential to improve its setting.</i></p> <p><i>There may also be the opportunity for its current use to be supported by complementary uses, which would be a public benefit, but we advise you to ensure that you are satisfied that the proposals would not inadvertently undermine the market's sustainability.</i></p>	<p>The acknowledgement of public benefits in this comment is welcomed. The proposals are conceived to complement and improve footfall to Leadenhall Market, enhancing its sustainability.</p>

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<b>HE12</b>	<p><b>Recommendation</b></p> <p><i>Historic England has concerns regarding the application on heritage grounds. We are particularly concerned about the quality of the design as a part of the Cluster, which impacts on the heritage context, and the effect of this design specifically in the setting of the Tower, and the effect on the daylighting of of Leadenhall Market.</i></p>	The responses to HE2 to HE11 apply to this comment.
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#### London Borough of Tower Hamlets

Comment ref	Comment	Response
<b>LBTH1</b>	<i>The proposed development raises some concerns about the degree of visual separation between the eastern cluster and the Tower of London. The proposed development is a tall building in terms of the City of London's planning policy (in excess of 70m AOD).</i>	The responses to HE2, HE3 and HE4 apply to this comment.
<b>LBTH2</b>	<i>With respect to heritage assets, Policy 7.8 of the London Plan (2016) and Policy HC1 of the Intend to Publish London Plan require that developments affecting the setting of heritage assets, including</i>	The responses to HE2 to HE8 apply to this comment.

	<p><i>conservation areas, listed buildings, scheduled monuments and World Heritage Sites, should conserve their significance. Additionally, Policy 7.10 of the London Plan (2016) and Policy HC2 of the Intend to Publish London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate OUV, integrity, authenticity or significance.</i></p>	
LBTH3	<p><i>View 10A – Tower of London: Inner Wall, East of Wakefield Tower</i></p> <p><i>Within this view, The City Cluster intrudes into the enclosed space. In this view, the tall building at No. 20 Fenchurch Street (The ‘Walkie Talkie’) rises above the historic group. The proposed development would appear partially on its right-hand side at a lower height than 20 Fenchurch Street. The harm to this view would be minimal.</i></p>	The response to HE 3 applies to this comment.
LBTH4	<p><i>View 10B – Tower of London: Inner Ward, West of The White Tower 2</i></p> <p><i>Within this view, 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 proposed development visually fills the gap between 20</i></p>	The response to HE 4 applies to this comment.

	<p><i>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.</i></p>	
<b>LBTH5</b>	<p><i>View 10D – Tower of London: Inner Wall, West of Bowyer Tower</i></p> <p><i>Within this view, The City Cluster is seen rising above the Grade II* Listed One Trinity Square. The submitted Heritage, Townscape and Visual Impact Assessment by Trium states that the proposals ‘effectively reduces the singularity of No.20 Fenchurch Street and contributes to the process of closing the gap between it and the principal Cluster’.</i></p>	<p>In this view, No.20 Fenchurch Street disrupts the envisaged compositional quality of the existing and emerging Eastern Cluster (seen in the cumulative view on page 141 of the HTVIA), as a singular outlier building with a powerful expression. The addition of the proposed scheme to this view softens this dichotomy between the Cluster and 20 Fenchurch Street, contributing to its connection with the emerging Cluster and be part of a single composition of tall buildings.</p>
<b>LBTH6</b>	<p><i>It should be noted The London Borough of Tower Hamlets objected to the now consented development at 50 Fenchurch Street (City of London ref: 19/01307/FULEIA). This development is for a 35-storey building outside of the City Cluster. 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</i></p>	<p>The proposed scheme does lie within the Eastern Cluster policy area as in the adopted 2015 Local Plan and draft City Plan 2036.</p> <p>There is considered to be no harm to View 10D as explained in the response to LBTH5 above.</p>

	<p><i>wall of tall buildings, some of which appear within an uncomfortable proximity to the Tower of London WHS. This would also run contrary to the plan-led approach to modelling the cluster and its impacts on the WHS set out in the City's Local Plan and emerging Local Plan. As such, the proposal would cause some harm in this view.</i></p>	
LBTH7	<p><i>Relevant strategic views are set out in the London View Management Framework SPG (2012). The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. Policies 7.11, 7.12 of the London Plan (2016) and the LVMF SPG outline the views of strategic importance to London, and detail how these views should be managed. The relevant LVMF views have been provided which would affect the Tower of London WHS. LVMF view 10A.1 would be affected very minorly, with only a sliver of the proposed development seen to the right-hand side of 20 Fenchurch Street. LVMF view 25A.1 would also be very minorly affected, with only a sliver of the proposed development seen to the left-hand side of 20 Fenchurch Street.</i></p>	Noted, no response.

#### 4. OTHER BODY REPRESENTATIONS

##### London City Airport

Comment ref	Comment	Response
LCY1	<p><i>London City Airport suggests the following conditions are added to this application. London City Airport's response must change to an objection unless these conditions are applied to this planning permission:</i></p> <p><i>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.</i></p>	Noted, no objection to the proposed condition.

##### NATS Safeguarding

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Comment ref	Comment	Response
NATS1	<p><i>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.</i></p>	Noted, no response.

## 5. NEIGHBOURING AND NEARBY LANDOWNER REPRESENTATIONS

### 4 Bulls Head Passage

Comment ref	Comment	Response
<b>4BHP1</b>	<i>We are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.</i>	A Daylight and Sunlight Addendum has been submitted to the City of London for further consultation, which addresses the concerns in relation to 2-4 Bulls Head Passage.

### 4B Bulls Head Passage

Comment ref	Comment	Response
<b>4BBHP1</b>	<i>I am the owner of Flat B, 4 Bull's Head Passage, EC3V 1LU and alongside my fellow flat owners at Flats A and C we are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.</i>	A Daylight and Sunlight Addendum has been submitted to the City of London for further consultation, which addresses the concerns in relation to 2-4 Bulls Head Passage.

	<i>I would like to make a representation that the residents are against this new development, as it will impact our quality of life.</i>	
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60 Gracechurch Street

Comment ref	Comment	Response
<b>60GS1</b>	<i>The building currently proposed at no. 70 is of a vastly different scale and character to the local context - in particular in relation to our client's premises at no. 60 Gracechurch Street, which are directly opposite and linked in function, use and townscape character.</i>	Noted. The proposed development responds to the current Eastern Cluster and emerging City Cluster in which it is placed. The area includes numerous tall buildings and the townscape and visual impact of the building has been considered widely.
<b>60GS2</b>	<i>Our clients do not object to the principle of the redevelopment of this site but seek further information to demonstrate that this development will not hinder the future development potential of no. 60 Gracechurch Street. Our client's property is an important corner plot directly opposite the application site, with clear linkages in terms of use (designated 'Principle Shopping Centre' frontage along both sides of Gracechurch and Fenchurch Street) and built form and the renewal and regeneration of both sites must be considered together.</i>	<p>The Applicant does not consider that the proposed redevelopment of No. 70 Gracechurch Street will inhibit the ability to redevelop No. 60 in any way. The improvement of the public realm and active uses at ground floor could complement any future proposals at No. 60. There is the potential for towers to positively relate in the emerging City Cluster.</p> <p>The proposals have been robustly justified in the context of the Development Plan including the policy referred to and have been subject to a full assessment of built heritage, townscape and visual impact.</p>

<b>60GS3</b>	<p><i>The potential for tall buildings in this City Cluster/Renewal Opportunity Area is acknowledged, however the scale of development, as currently proposed, does not accord with that of the surrounding area. Local Plan design policy CS10 confirms that the bulk, height, scale and massing and detailed design of buildings must be appropriate to character, amenity and setting and the proposal must therefore relate to the existing built form. If a tall building is to be considered it must have due regard to opportunities for redevelopment of a similar scale at no. 60. Good design principles would focus height and mass towards corner locations (such as this) and the applicants must demonstrate that future opportunities as envisaged in the emerging plan, are not hindered.</i></p>	
<b>60GS4</b>	<p><i>No. 60 Gracechurch Street is currently occupied with retail uses at ground floor and offices above. The existing tenants have an ongoing lease agreement and have no plans to vacate. London plan (policy 7.6) and local plan policy (CS14), as well as emerging London plan policy D9 and Local Plan policy S12 confirm that tall buildings will only be acceptable where there is no</i></p>	<p>The Development Plan does not require the assessment of daylight and sunlight impacts to office or retail buildings and the BRE guidance does not regard these uses as sensitive. Relevant properties for daylight and sunlight assessment were reviewed and confirmed as appropriate through the EIA scoping report.</p>

	<p><i>adverse impact on the amenity of their surroundings. The redevelopment of no. 70 Gracechurch Street has the potential to have an adverse impact on the amenities of existing occupiers on Page 3 grounds of potential loss of daylight/sunlight. The applicants have not explored these impacts fully, such that we can be satisfied that there would be no adverse impact.</i></p>	
	<p><i>The application site is in close proximity to two conservation areas (Eastcheap and Leadenhall conservation areas) and a number of listed buildings, including the Grade 1* listed Monument and the Tower of London World Heritage Site. London plan policy 7.8 and Local Plan policy CS7 seek to protect Heritage assets and are clear that proposals for tall buildings must conserve heritage assets and their settings. The impact of the development in this unique heritage context and its effect on daylighting to Leadenhall Market has been identified as a cause for concern by Historic England, who have requested that these matters should be fully addressed. We are concerned that any consideration in advance of satisfactory resolution of these issues would be premature.</i></p>	<p>These issues have been considered in detail across the submission including in the Heritage, Townscape and Visual Impact Assessment (ES Vol.2) and it is not considered that there is a need for further assessment. Leadenhall Market is highly enclosed (with both a roof/truss and brise soleil blocking sunlight where partially glazed) and therefore there is limited opportunity for overshadowing impact.</p>

**ENDS**

**DP9 Limited**

**15/01/2021**



# TECHNICAL NOTE

<b>Project</b>	70 Gracechurch Street
<b>Report Title</b>	Response to CoL Comments
<b>Date</b>	15/01/2021
<b>Prepared by</b>	Momentum Transport Consultancy
<b>Prepared for</b>	City of London (CoL)

## 1. Introduction

- 1.1 This Note has been prepared in response to comments received from the City of London (CoL) regarding the submitted planning application for 70 Gracechurch Street.
- 1.2 The requested clarifications and/or the additional information sought from CoL Highways is summarised in Appendix A. This appendix provides a succinct summary of transport related comments and the respective responses. In some circumstances, further information has been requested with additional detail, and these items have been summarised in the below section of the Technical Note.

## 2. Further Information

- 2.1 The responses provided can be summarised into the following key discussion subjects:

- Highway Boundaries
- Pedestrian Comfort Level (PCL) Scores
- Lime Street Cycle Rack Dimensions
- Cycle Parking Calculations

- 2.2 All other items are responded to in note format and are attached in Appendix A.

### HIGHWAY BOUNDARIES

#### CoL Comment(s):

*"We believe that the majority of the stopping up is proposed on TfL highway, and that some of the proposed stopping up on Fenchurch Street is already private land, so would not need to be stopped up"*

*"Figure 3.14 presents the existing highway boundaries and Figure 3.15 presents the revised highways boundaries as a result of the Proposed Development. We believe that the majority of the stopping up is proposed on permissive path so may not need to be stopped up. Please confirm if you are proposing the stopping up due to your understanding that the permissive path has become public highway due to long use?"*

- 2.3 A detailed review of the highway boundaries submitted as part of the submitted TA has been undertaken. Further checks have confirmed that the ownership of the proposed footprint of the new development is within private land and owned by the site. Therefore, no stopping up of public highway would be required as part of the proposed development.

- 2.4 A revised drawing has been prepared to show the updated land ownership plan and is attached in Appendix B.

## PEDESTRIAN COMFORT LEVELS

### CoL Comment:

*"For ease, please can the applicant provide a table showing the PCL score at each location now and the PCL score proposed without diversion, and with diversion, eg"*

- 2.5 The suggested format presented in the below tabled has been requested for simplification. Whilst the recommended format and table has been populated, additional columns to account for AM and PM peak hours separately have been added as this was considered useful context. The PCL scores presented are considered the most representative of the links as a whole.

#### 2.1: PCL Scores

Location	Base 2027		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 no diversion of pedestrians flows through the site corner

- 2.6 It can be seen that the PCL scores of F would be removed with the proposed development. This would be achieved via rebalancing and rationalising of the space available on Lime Street. Consequently, under the 'with development' scenario all links would meet the minimum accessibility criteria (i.e. 2m minimum width) with the proposed development and so represents a significant improvement from existing conditions in this regard.
- 2.7 The majority of the locations will likely perform at a minimum PCL score level of B. Two links would achieve a PCL score of C+; however, one of these is improved from an existing score of F, and the other would benefit from the likely diversion of pedestrian flows through the site corner (e.g. those travelling to Lime Street from Fenchurch Street west and vice-versa as this represents a shorter distance).



### **CoL Comment:**

*"How wide would the footway have to be extended by, to improve the pinch point C- score on the corner of Gracechurch Street and Fenchurch Street? Would this minor footway widening be agreed to be in the scope of the S278 if TfL and the City agree?"*

- 2.8 The pinch point PCL score of C- at the southern end of Gracechurch Street is caused by the existence of the cluster of post, signal box and traffic light. The radius is also tight at this location because of the left turn from Gracechurch Street on to Fenchurch Street. Widening the footway at this location would impact on the ability of larger vehicles to turn left into Fenchurch Street (under the current junction operation) and this does provide limitations to widen the footway at this location, with the information we currently have at our disposal.
- 2.9 Nevertheless, we have reviewed the PCL assessment at this location in order to gain an understanding of the widening that would be required to improve on the PCL score of C- as presented within the submitted TA. Upon updating the PCL assessment required to undertake this work it was observed that the future N / S baseline flows assumed along Gracechurch Street had been onerously applied.
- 2.10 The baseline flows have subsequently been updated to be consistent with the other external footway links (i.e. growthed to 2027). The work requested by CoL looking into the widening that would be required to improve upon the C- score presented in the TA was subsequently undertaken. It was found that a score of C+ (in the AM and PM peak hours) would be achieved at this location with the corrected baseline flows accounted for.
- 2.11 An increased widening of 0.01m would be required along Fenchurch Street in order to achieve a PCL score of C+ at this location.
- 2.12 CoL Highways has queried if the applicant would be willing to undertake minor footway widening. As outlined above, the PCL assessment has provided positive and supportive PCL results. Moreover, any change in widths to the footways in question, would likely impact the operation of the junction and corner radius, all of which we understand is under investigation by CoL and TfL. The Applicant may be willing to consider contributing an appropriate and reasonable amount towards the potential upgrade of the Gracechurch Street / Fenchurch Street junction as part of a S278 agreement with CoL / TfL however, minor widening works may become redundant or superseded by the overall junction review. In summary, it is our view that the PCL analysis undertaken is robust and demonstrates that the surrounding footways can accommodate the development flows.

## **LIME STREET CYCLE RACKS**

### **CoL Comment:**

*"There should be a minimum 2m wide access route next to occupied cycle stands on the eastern pavement of Lime Street, as this would accommodate larger electric mobility scooters (BS8300-1:2018 8.1.2)."*

- 2.13 It is confirmed that a minimum of 2m wide access route would be provided next to an occupied cycle stand on the eastern pavement of Lime Street. Figure 2.1 below provides further clarity on the dimensions at this location.

Figure 2.1 Dimensions Available at Lime Street (East)



- 2.14 It can be seen that when a parked cycle is accounted for, there would be a space of 2.3m available to the east of the cycle rack. To note, the widths shown in the submitted PCL maps as part of the TA document take account of buffer space to each side of the parked cycle, as per TfL's PCL guidance.

## CYCLE PARKING CALCULATIONS

### CoL Comment:

*"There are some discrepancies between my working for the cycle parking calculations and the applicants. Please can the numbers be clarified to confirm what the London Plan requires?"*

*"How has the Public gallery cycle parking been worked out?"*

- 2.15 The cycle parking calculations have been reviewed. The number of long stay spaces required for Retail (Non-Food) has been increased from one to four and the total number of long stay spaces required has therefore increased by three. The discrepancy in short stay spaces required for Retail (Food) has occurred due to the application of A3-A5 food retail standards within the TA for robustness. This is considered a 'worst-case' application of the standards and no changes are therefore proposed to be made in this regard.
- 2.16 In summary, the requirement for long stay spaces has increased by three (985 total now required) and there is no change to the short stay space requirement (102).
- 2.17 The public gallery cycle parking has been calculated by reference to the 'Other' D1 category within ITP London Plan. The cycle parking requirement is based on the number of staff for long stay spaces and based on sqm for short stay requirements. The number of staff has been calculated by reference to the Employment Density Guide and the use class assumed has been D2 (Visitor and Cultural Attractions) and is consistent with the recently submitted 55 Gracechurch Street application. The subsequent calculations indicate that there will likely be 8 staff members required and therefore one long stay space is required as per the ITP London Plan standards. Sixteen short stay spaces are required.



2.18 The updated totals of cycle parking spaces required are provided below for clarity:

*Figure 2.2: Updated Cycle Parking Calculations*

Land Use	No of Spaces	
	Short Stay	Long Stay
Office B1	24	974
Public Gallery (Other)	16	1
Retail (Food)	46	6
Retail (Non-Food)	16	4 (+3)
<b>Total</b>	<b>102</b>	<b>985</b>

2.19 The above change in the required number of cycle parking spaces is minor and can readily be incorporated at the next stage.

2.20 Responses to the remaining items raised by CoL are provided in Appendix A.

2.21 We trust all matters have been satisfactorily addressed and welcome any further discussions in relation to the technical highways matters.

## **APPENDIX A**

Deliveries and Servicing		
#	CoL Comment	Response
D1	A condition or obligation should be included to ensure that servicing is only allowed between 2300-0700 each day	Noted. The Applicant would be willing to commit to the nominated servicing hours.
D2	Deliveries in the daytime (ie when the vehicle lifts are not in use: 0700-2300) should be done by cargo cycle or foot only	Noted and acknowledged within the submitted DSP.
D3	The DSP is required and should comment on the use of cargo cycles and the number of vehicles that are not on the road/accessing the development due to the use of cargo cycles to show the benefits of using cargo cycles	The use of cargo bikes during the day will contribute to the removal of all daytime vehicle deliveries as these sustainable deliveries enable an overnight vehicle delivery strategy to be implemented. As such, all delivery vehicles that might otherwise have been present on the wider highway network during the day will be removed. Any existing daytime delivery servicing vehicles will also be removed as a result of the proposals. The detailed DSP which we understand will be secured by way of condition, can investigate in further detail - the corresponding cargo bike loads that could feasibly be used by the development and the comparative vehicles that would otherwise use the road network.
D4	The use of an off-site consolidation centre will be mandatory	It is understood that the use of consolidation centres is pertinent to the servicing strategy and ensuring the proposed loading areas work appropriately. The use of an off-site consolidation centre is, however, also dependent upon external factors such as the continued delivery and expansion of these schemes via logistical companies. Whilst it can be assumed that this delivery will continue, it is requested that the wording be modified to allow some flexibility for the development to refine the internal operations should it be necessary. The Applicant would be willing to agree to a condition requiring the use of consolidation centres, on the basis of the supply being available and we would request that the proposed development be permitted 6-12 months from opening to address this requirement.
D5	We recommend a cap on the number of vehicles to the site per servicing period (2300-0700) of 58 vehicles, and a maximum of 3 of the deliveries do not have to travel from the consolidation centre (the remaining 55 must travel from the consolidation centre)	A cap on daily servicing vehicles is supported; however, it is proposed that a buffer of 10% is allowed to account for daily fluctuations of deliveries that may be required across the week and indeed contingency purposes. This approach is consistent with the feedback received from CoL for 55 Gracechurch Street. In this regard, we would request that the recommended daily cap be amended to 64 vehicles and a maximum of 3 deliveries not travelling from a consolidation centre.
D6	All lift maintenance should be done at the weekend unless it is emergency maintenance, and this should be secured through legal agreement	Noted. The Applicant would be willing to commit to this.
D7	The vehicle loading bays in the basement will provide electric vehicle charging, which is welcomed and this should be secured by condition	Noted. The Applicant would be willing to commit to this.
#	Additional Questions	
D8	Please can the applicant confirm they will agree to a condition or planning obligation limiting servicing by vehicle to 2300-0700 each day only?	Please comment D1.
D9	Please can the DSP include comment on the number and commitment to the use of cargo cycles?	Please comment D3.

D10	One of the documents states "The Proposed Development will use freight consolidation as required by policy and is therefore forecast to generate 78 delivery and servicing trips per day, and up to 8 trips within the peak hour." However, most of the information states 58 deliveries per day – please clarify	It is confirmed that the expected daily delivery frequency is 58 vehicles with consolidation.
D11	How will the public realm area (where retail is proposed) on the lids of the vehicle lifts be serviced? Will the applicant commit to servicing this market stalls on the vehicle lifts via cycle courier only?	It is our understanding that vendors associated with pop-up retail would generally arrive on site with the necessary facilities and goods. Notwithstanding, there will be the opportunity for the area to be served by cargo bikes / foot deliveries. The Applicant would be willing to consider this, noting that there could also be some synergies applied to the overnight servicing strategy given the small scale nature of the pop up retail facilities.
D12	Please can the applicant confirm they will sign up to a legal agreement to maintain the lifts, which includes all routine lift maintenance to take place at weekends?	Noted. The Applicant would be willing to discuss a legal agreement regarding maintenance.

### Public Realm and Pedestrian Comfort

#	CoL Comment	Response
P1	The new pedestrian route through the development is welcomed and considered a key benefit of the scheme. We will want to ensure that the 'approximately 5 metres of useable, sheltered footway' would be maintained and not blocked by furniture etc, and as such there will be an obligation associated with the public space	Noted. The Applicant would be willing to further discuss this obligation which would be delivered under the permissive path criteria.
P2	Lighting should be agreed by condition and should be in line with the City of London (CoL) Lighting Strategy. CoL street Lighting will be placed on the building	Noted. The Applicant would be willing to commit to engaging in further discussions with the CoL in this regard and the details of such would need to be agreed at the next design stage.
P3	There are expected to be 1107 NET trips in the AM peak hour (0800-0900) and there are expected to be 1080 NET trips in the PM peak hour (1700-1800)	
P4	The increase in people to the development at peak hour is considered acceptable due to the mitigation being provided in the form of:	
P5	- a new n/s pedestrian route through the building	
P6	- potential within the CoL S278 to widen the footway on either side of Fenchurch Street (dependent on the future vision for the street)	
P7	- potential within the TfL S278 to widen the footway on Gracechurch Street (subject to TfL agreement)	
P8	- redesign of the Lime Street Junction with Fenchurch Street within the S278 scope	
P9	- footway improvements on Philpot Lane within the S278 scope	
P10	- footway improvements and the consideration of an extension of the timed closure on Lime Street within the S278 scope	Noted. As per Pre Application discussions, there are opportunities to consider improved footway widths along the site's western frontage (Gracechurch Street) and the site's southern frontage (Fenchurch Street). It should be acknowledged that the submitted TA has provided the PCL scores for the future operations, and the delivery of the n/s route through the Site forms the primary mitigation for diverting trips through the site, in addition to the junction redesign of Lime Street / Fenchurch Street / Philpot Lane and the opening up of the south eastern corner of the site. The aforementioned mitigation measures do form the primary mitigation being provided with potential to consider the Fenchurch Street and Gracechurch Street footway works, however those components of work are directly linked and associated with TfL and CoL identified schemes. Further discussions will be required and negotiated separately. Notwithstanding, the PCL analysis undertaken supports the proposed development impact <u>without</u> the requirement to deliver footway widening on Fenchurch Street and Gracechurch Street.
P11	Overall, the geographical area of the CoL S278 should include Lime Street (up to and including the existing bollards), Fenchurch Street, Philpot Lane and Rood Lane. The TfL S287 should be negotiated separately	Noted .
P12	Relocation of the taxi rank and TRO changes on Philpot Lane would be in the scope of the S278 – however it would be subject to a public consultation process and we cannot pre-judge the outcome of this	Noted.
P13	The detailed design of the S278 will take place later in the process and will be informed by City of London Policy, our vision for the area and, TfL's Healthy Streets.	Noted.
P14	The PCLs have been calculated with an expected 10% of people taking the new pedestrian route through the building. This figure is considered reasonable.	Noted.
P15	When you take into account the proposed new route through the development the PCL scores achieved would be generally much improved from the expected PCL scores in 2027.	Noted and agreed.
P16	The provision of the new pedestrian route, the improved permeability of the south eastern corner of development, and the realignment of Lime Street and Philpot Lane have helped to improve the PCLs.	Noted.

P17	The Gracechurch Street PCLs have improved due to the setting back of the façade and also due to the removal of pinch points. Two pinch points remain on the corner of Fenchurch Street and Gracechurch Street, which are as a result of the signal box and secondly as a result of the radius of the corner of the kerb. Mitigation to remove this pinch point and improve the PCL score could come in the form of widening the footway on the corner of Gracechurch Street and Fenchurch Street. This would be in agreement with TfL, the City and the applicant, but the applicant has shown willingness to improve the footways on Fenchurch Street	Please see comment P26 below.
P18	There are two trees proposed on Rood Lane, primarily for wind mitigation purposes. This form of wind mitigation is not the preferred option as it reduces the useable width of the footway. However, in this instance, the PCL score on Rood Lane remains at A+, and the clear footway width remains accessible, therefore this is considered acceptable in highway terms	Noted.
P19	It was disappointing to see the Transport Assessment stated the "Applicant is not committing to carry out works as part of the Proposed Development beyond the 'Do Minimum' scheme". We consider the S278 works discussed in our continued pre-application process as necessary to offset the downsides associated with the development, including the wind conditions as a result of the development, and this wording needs to be discussed with the CoL	<p>The improvements delivered as part of the 'Proposed Development' are seen as the minimum that can be delivered at this moment in time given the uncertainty surrounding the future of Fenchurch Street and wider improvements that may be identified and delivered. It is stated within the TA at Paragraph 5.5.47 and 5.5.48 that, <i>"It was confirmed with TfL that this flexible approach was the most appropriate way forward given the uncertainty involved as a consequence of the improvement scheme's prematurity and the future function of Fenchurch Street. Once the future function of Fenchurch Street can be identified, discussions surrounding the optimal crossing provision at this location can re-continued.</i></p> <p><i>To reiterate, the Applicant would be open to discussing and investigating in liaison with TfL and Col whether contributing towards the delivery of an alternative future scheme (to the 'Do Minimum' scheme presented within this TA) would be appropriate."</i></p> <p>The Applicant remains committed to engaging in these discussions regarding the Lime Street/Fenchurch Street/Philpot Lane junction as part of a S278 agreement when the time is appropriate to CoL / TfL.</p>
#	<b>Additional Questions</b>	
P20	The CoL will expect the applicant to sign up to obligations in the S106 agreement to ensure the public routes through the development are accessible at all times (as agreed) and built and insured to an appropriate level – please confirm agreement	Noted. The Applicant would be willing to further discuss this obligation which would be delivered under the permissive path criteria.
P21	Where will the seating/public furniture be stored when not in use on the vehicle lifts?	The DAS notes that loose furniture shown in visualisations is indicative only. In the proposed pop-up market, the stalls/carts are intended to be provided by the vendors, and therefore stored offsite. However, in the design development stage, agreements between the building management and vendors could facilitate the use of some of the storage facilities located in the basement and be accessed via the goods lifts (outside of peak hours). Please see comment D1 for further information in this regard.
P22	There is a statement which says: "The proposed pedestrian walkway that would be provided as part of the development would provide an additional pedestrian route through the Site and would be accessible to those that wish to access the Proposed Development." This statement could be misinterpreted to mean people can only use the route through, IF they are accessing the site. Please confirm this is a genuine publicly accessible route for anyone to use – this is our understanding	Noted. It is confirmed that this would genuinely be a publicly accessible route for anyone to use as permissive path.
P23	Are all the existing public cycle parking stands relocated from the west to the east of Lime Street?	Yes, they are relocated in full. Nine cycle racks (and 18 spaces) are maintained.

P24	When the vehicle lifts are in use how wide will the public access route past the lifts be and how will it be managed?	To note, with the implementation of overnight servicing, the vehicle lifts would only be in operation when there are no pedestrians present in the space. In this regard, it would be likely that the area would be secured (by fencing or otherwise) to restrict interaction between vehicles and pedestrians and the closure would occur along the column line of the building and this space (akin to the HVM bollards)  In the rare event of vehicle lift malfunction, the narrowest points around the southern-most lift (worst case) would be 4.2m (x2) - to the columns to the south and to the east of the southern-most lift. The space available between the southern-most vehicle lift and cycle racks to the south would be 7.6m (including for a parked bicycle). Anti-clockwise routing would provide a pedestrian route width of no less than 3.3m to the west of the vehicle lift.
P25	For ease, please can the applicant provide a table showing the PCL score at each location now and the PCL score proposed without diversion, and with diversion, eg:	Information provided in supporting Cover Note.
P26	How wide would the footway have to be extended by, to improve the pinch point C-score on the corner of Gracechurch Street and Fenchurch Street? Would this minor footway widening be agreed to be in the scope of the S278 if TfL and the City agree?	Information provided in supporting Cover Note.

## Stopping Up

#	CoL Comment	Response
S1	We believe that the majority of the stopping up is proposed on TfL highway, and that some of the proposed stopping up on Fenchurch Street is already private land, so would not need to be stopped up	Information provided in supporting Note.
#	Additional Questions	
S2	Figure 3.14 presents the existing highway boundaries and Figure 3.15 presents the revised highways boundaries as a result of the Proposed Development. We believe that the majority of the stopping up is proposed on permissive path so may not need to be stopped up. Please confirm if you are proposing the stopping up due to your understanding that the permissive path has become public highway due to long use?	Information provided in supporting Note.
S3	What is the area in sqm that is proposed to be stopped up?	Information provided in supporting Note.
S4	Please confirm that all HVM will be within the façade of the building and on private land	The HVM bollard line is entirely within the ownership boundary / building envelope but is not entirely integrated into the façade.

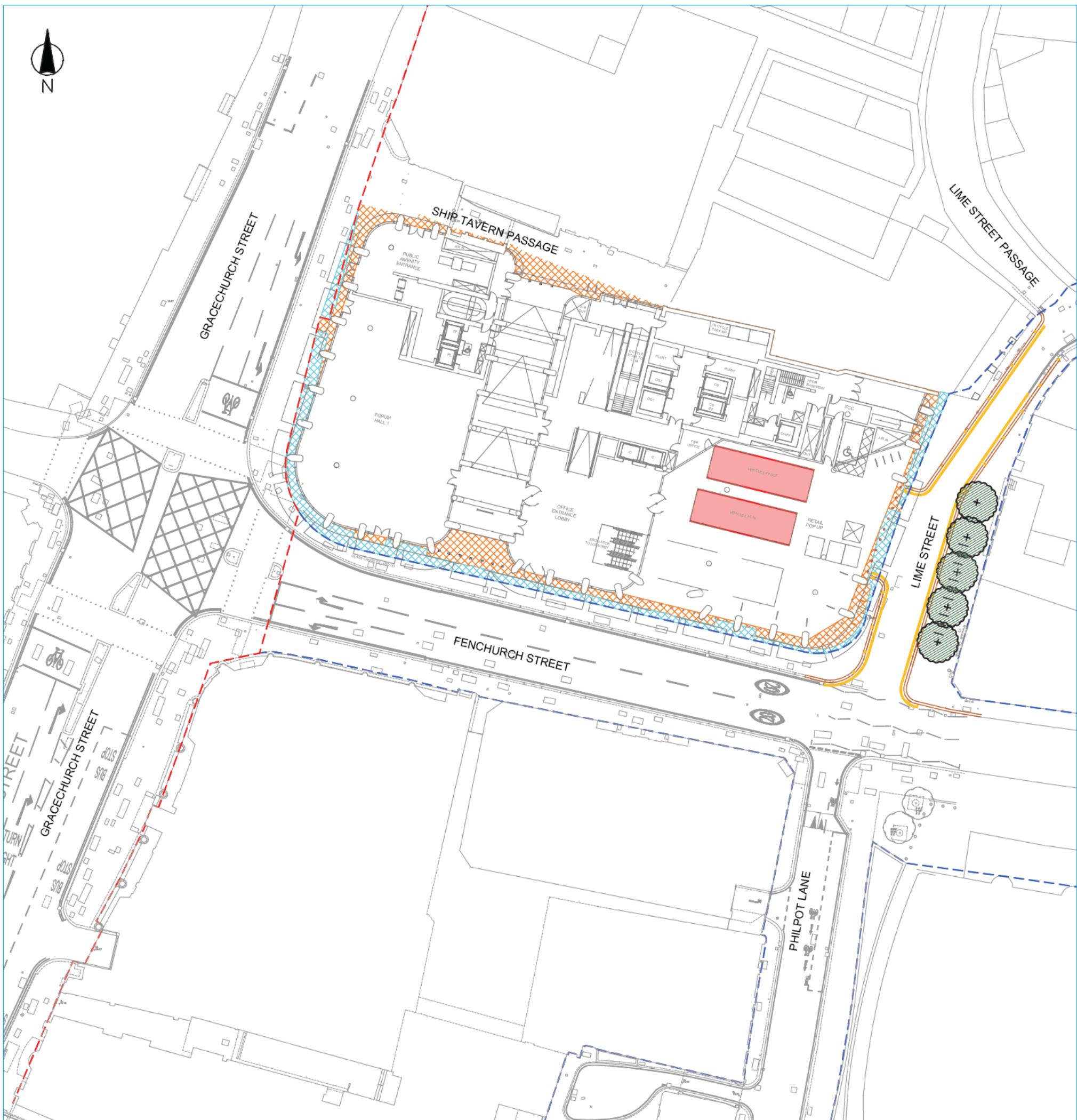
## Cycling

#	CoL Comment	Response
C1	The proposed modal shares in the travel plan include 12.5% of people travelling by cycle, which is welcomed	Noted.
C2	Three cargo bike spaces provided at ground floor level. These spaces would provide a servicing function with additional flexibility, increasing its ability to react to bespoke site requirements in the future.	Noted.
C3	The long stay cycle parking can be accessed via 2 cycle lifts, 2 goods lifts, or gullied staircase and these three methods are welcomed and will give options to people at busy times	Noted.
#	Additional Questions	
C4	There are some discrepancies between my working for the cycle parking calculations and the applicants. Please can the numbers be clarified to confirm what the London Plan requires?	Information provided in supporting Note.
C5	How has the Public gallery cycle parking been worked out?	Information provided in supporting Note.
C6	There are 100 showers and 668 lockers proposed. Showers are being provided at a ratio of 1 shower per 10 cycle parking spaces which is acceptable. However, the number of lockers being proposed is low – we recommend at least 1 locker is provided per long stay cycle parking space so people have somewhere to store their personal belongings. These lockers may also be used by people who want to walk or travel actively to the development. Please can the applicant increase the locker provision?	An optimisation of the layout of Basement 1 floor has been undertaken and the site can deliver an additional 32 lockers, bringing the total provision to 700 and above the minimum London Plan policy requirement. A provision of one locker per one long stay cycle parking space is unachievable with the space available and would impact other facilities in the area, such as cycle parking.

C7	22 short stay cycle spaces are proposed at ground floor and these would be provided as Sheffield Stands. This is a decrease from the 30 (+ cargo cycles) proposed at the pre-app discussions and this is disappointing and not accepted – why has the decrease occurred?	The latest plans shown to CoL on 13th August 2020 stated 22 short stay spaces (+ three cargo bike spaces) would be provided and so it is unclear where this confusion may have originated from. However, three additional short stay spaces have been provided specifically for larger cycles and are incorporated within the building. These would be in addition to the cargo bike spaces and so the total provision of short stay cycle parking would be 25 spaces (of which 3 are larger cycle spaces) in addition to the 3 cargo bike spaces, thereby totalling 28 short stay spaces.
#	<b>Cycle facilities - Access</b>	<b>Response</b>
C8	23. Sheffield cycle stands are beneficial for people who use a two-wheeled bike as a mobility aid and do not have strength or dexterity to use wall mounted or two-tiered cycle racks, however the London Cycling Design Standards 8.2.1 recommends that “at least 5 per cent of all spaces should be capable of accommodating a larger cycle”. It is noted that 5% of the long stay cycle parking will consist of Sheffield cycle stands however if these stands were to be used by larger cycles, such as tricycles, handcycles and recumbent cycles which can be up to 1.2m wide and 2.8m long, the capacity of these stands would be substantially less than the proposed 50 cycles. Three larger cycle spaces are proposed on the ground floor however it is noted that these would be reserved for cargo bikes to assist with smaller deliveries to the site (Transport Assessment 3.17.53).	Reference should be made to comment C7 above in relation to larger cycles for short stay cycle parking which addresses the concerns raised. In relation to long stay layouts for sheffield stands, it would be possible to review the proposed layout to deliver a similar proportion of larger spaces to that provided for the short stay provisions. This detailed design work could be considered at the next design stage.
C9	24. The effective clear width of the doors in the Lower Ground Floor are too narrow for cycles. 1000mm minimum door openings are required and any door to a cycle parking area should be automated with push button or pressure pad operated (London Cycling Design Standards 8.2.1).	Momentum has reviewed this comment alongside the project architects KPF and the effective clear width of all doors on the lower ground floor can be updated at the next design stage to accord with the LCDS requirement of 1m.

<b>Other</b>		
#	<b>CoL Comment</b>	<b>Response</b>
O1	Doors must not open outwards in line with the Highways Act 1980	There are five egress doors that are required to open outwards. However, all five doors are set in from the building line as defined by and flanked by structural columns and open out on to private land.
O2	Legible London contributions will be required	Noted. The Applicant would be willing to further discuss this requirement.
O3	CLP – any street closures must maintain cycle and pedestrian access and construction deliveries should be consci	Noted. The proposed construction methodology has been submitted with the planning application and will need to further develop this work as part of the detailed CLP.
#	<b>Additional Questions</b>	
O4	The canopies will require a projection licence – please can the applicant confirm the height is 7.6m above the highway below?	The ground floor canopies are currently proposed at 6m clear height above the pavements, in line with discussions with officers during pre-application consultation and CoL policy. This provision exceeds the requirement of 5.7m.
O5	I can see there is space for security at the ground floor access for the public garden, what form of security checks are expected to take place? E.g security scanners, cameras, physical etc.	Application drawing PA-100 (ground floor) indicates two body scanners and one bag scanner within the Public Gallery entrance hall. Security provisions will be developed in future design stages and will be reflected in the management plan.

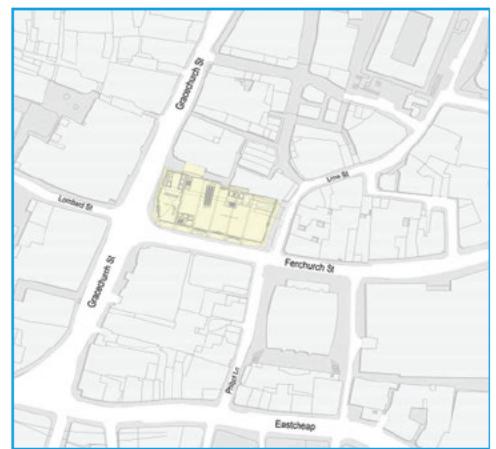
## **APPENDIX B**



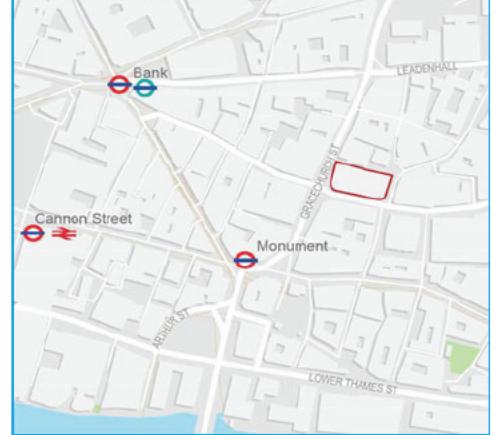
#### NOTES

1. Do not scale from this drawing, work to figured dimensions only.
2. This drawing is based on OS mapping provided by City of London Interactive Map and KPF plan referenced Iteration G.2, SK-426, dated 03/08/2020.
3. This highway layout is preliminary design only and has not been subject to Road Safety Audit.

- Proposed kerb
- Existing CoL highway boundary
- Existing TfL highway boundary
- Revised existing CoL permissive paths - 148m<sup>2</sup>
- Proposed permissive path - 182m<sup>2</sup>
- New total of permissive path - 330m<sup>2</sup> (gain of 182m<sup>2</sup> from revised existing)



OVERVIEW PLAN



LOCATION PLAN

Rev	Date	By	Remarks	Chkd	Appd
D	13/01/21	PD	Minor Update	TE	DHG
C	30/09/20	OO	Minor Update	TE	DHG
B	27/08/20	OO	Updated GF Layout	TE	JM
A	21/04/20	TE	First Issue	JM	DHG

**momentum**  
transport consultancy

Client

Advanced Idea Holdings Limited

Job Title  
**70 GRACECHURCH STREET**

Drawing Title  
**GENERAL ARRANGEMENT  
PROPOSED HIGHWAY BOUNDARIES**

Drawing Status

**FOR  
APPROVAL**

Scale at A3  
**1:500**  
Drawing No  
**M000349-2-E-DR-026**

**FIGURE 3.15**

**COPYRIGHT**

OVERVIEW PLAN: OpenStreetMap

LOCATION PLAN: Ordnance Survey

Rev  
**D**



## Project & Document Details

Project Name	70 Gracechurch Street
Project Number	M000349
Document Title	Technical Note

## Document History

Issue	Status	Reason for Issue	Issued to
1.0	Final	For Planning	CoL

## Issue Control

Issue	Date	Author	Contributors	Authorisation	
				Name	Signature
1.0	15/01/2021	WS	JM	JM	[Redacted]

Kurt Gagen  
Corporation Of London  
Planning & Transportation Department  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2020/132483/02-L01  
**Your ref:** 20/00816/FULEIA  
**Date:** 20 January 2021

Dear Kurt

**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.**  
**REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects).** (The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).

#### **70 Gracechurch Street London EC3V 0HR**

Thank you for consulting us on the revisions for this full EIA application for the proposed redevelopment of 70 Gracechurch Street. Given the location and the lack of environmental constraints within our current remit, we have no comments to make on this application.

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

Yours sincerely,

**George Lloyd**  
**Planning Advisor**

Direct dial: +44 20302 54843

Direct e-mail: [HNLsustainablePlaces@environment-agency.gov.uk](mailto:HNLsustainablePlaces@environment-agency.gov.uk)

End



Your ref: 20/00816/FULEIA  
My ref: 21/00203/OBS

**Please reply to:** Nikki Mitchell  
Tel No: 07866037846  
Email: southplanningteam@westminster.gov.uk

Kurt Gagen  
City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

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

21 January 2021

Dear Sir/Madam

#### TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

**Application No.:** 21/00203/OBS

**Application Date:**

**Date Received:** 13.01.2021

**Date Amended:** 13.01.2021

**Plan Nos:** Letter from City of London dated 13 January 2021.

**Address:** Development Site At 70-75 Gracechurch Street And, 168 Fenchurch Street, City Of London, London

**Proposal:** 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. REVISIONS RECEIVED. THESE INCLUDE: ES Addendum (relating to daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects). (The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis); 1,125sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD).

The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Yours faithfully

Deirdra Armsby

## **Director of Place Shaping and Town Planning**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatics in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**Note:**

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- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**From:** Gagen, Kurt  
**To:** DBE - PLN Support  
**Subject:** FW: Representation Acknowledgement (20/00816/FULEIA)  
**Date:** 26 January 2021 16:01:30

---

**From:** Will Ryan <[REDACTED]>  
**Sent:** 26 January 2021 15:09  
**To:** Gagen, Kurt <[Kurt.Gagen@cityoflondon.gov.uk](mailto:Kurt.Gagen@cityoflondon.gov.uk)>  
**Cc:** PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>; Emma Baylis <Mann Vergan  
**Subject:** Re: Representation Acknowledgement (20/00816/FULEIA)

Hi Kurt / Rianne,

Thanks for your response.

We are all keen to receive correspondence on this matter.

I have tried to submit my own objection just now, but the website fails when I press submit:

Here is the text of my objection:

**I am the owner of Flat C, 4 Bull's Head Passage, EC3V 1LU and alongside my fellow flat owners at Flats A and B we are concerned that the new development will impact light into our apartments, and significantly reduce light later in the day, as the sun passes behind the new proposed building. Our block sits extremely close to the new high-rise.**

**I would like to make a representation that the residents are against this new development, as it will impact our quality of life.**

**Regards,  
William Ryan**

**PS. I was advised by Rianne to make my own comment on this development (rather than just the comments made by Mann Vergan on my behalf), so that I am individually informed via email (preferable) or post of any developments here.**

Please can you submit that as a comment if this is useful, or alternatively, please add my email/postal address as a party that should be notified of any progress here.

Thanks,  
Will Ryan

1 February 2020

**70 Gracechurch Street**

in the City of London Corporation

planning application no. 20/00816/FULEIA

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Office-led mixed use redevelopment of the site comprising demolition of existing buildings and construction of a new building up to 33 storeys (155m AOD) providing office use, flexible retail, a public viewing gallery, and associated public realm improvements works and other works associated with the development including access and highways works.

**The applicant**

The applicant is **Advanced Ideas Holdings**, and the architect is **Kohn Pedersen Fox Associates (KPF)**

**Strategic issues**

**Principle of development:** The principle of the proposed office-led mixed use redevelopment within the CAZ and CAZ retail cluster is strongly supported in principle. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office and retail offer (Paragraphs 19-29).

**Urban design:** The development layout is strongly supported and the height and massing is acceptable in strategic planning terms, subject to strategic views and heritage considerations. Overall, the scheme is of a high design and architectural quality (Paragraphs 30-51).

**Heritage:** The development would result in harm to several heritage assets many of them of high significance including The Tower of London World Heritage Site and the Grade I listed St Peter ad Vincula Chapel and Beauchamp Tower as assets in their own right. Further assessment of potential impact is required in relation to Tower Bridge, Billingsgate Market, the Custom House Canon Street Station and 1 Cornhill. Following receipt of the additional material sought, GLA officers will be in a position to assess the impact to heritage assets (Paragraphs 52-78).

**Climate Change:** Further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network. The anticipated shortfall in CO2 reductions should be met through an offset contribution (Paragraphs 79-86).

**Transport:** Cycle and car parking is acceptable, subject to further clarification on cycling access/egress routes; improvements to cycling infrastructure should be assessed and a financial contribution towards a cycle hire docking station is required. Further assessment on public transport impact is required. Public realm works to Fenchurch Street and Philpot Lane are strongly supported. Servicing strategy is supported in principle. Conditions in relation to DSP, CLP and Travel Plans must be secured. (Paragraphs 87-102)

**Recommendation**

That the City of London Corporation be advised that, whilst the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan, for the reasons set out in paragraph 106 of this report.

## **Context**

1 On 12 November 2020 the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- 1C.1(b) "*Development which comprises or includes the erection of a building of more than 150 metres high and is in the City of London.*"

3 Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website ([link here](#))<sup>1</sup>.

## **Site description**

6 The site forms the north east corner of the junction at Gracechurch Street, Lombard Street and Fenchurch Street and is bound by Gracechurch Street to the west, Fenchurch Street to the south, Lime Street to the east and Ship Tavern Passage to the north. Leadenhall Market is situated further to the north. The site currently comprises a modern, eight storey mixed use building, constructed in 2001, occupied by a Marks and Spencer department store at ground and first floor levels and offices above. The site is located in the Central Activities Zone and is within the Eastern Cluster as defined by the City of London Local Plan. The site's frontages are also located within the Leadenhall Market Primary Shopping Centre.

7 Gracechurch Street (A1213) forms part of the transport for London Road Network (TLRN). The nearest section of the Strategic Road Network (SRN) is Eastcheap, approximately 150 metres south. The site has a very high public transport access level (PTAL) of 6b, which is considered excellent. It is within walking distance of Liverpool Street, Fenchurch Street, Aldgate, Bank, Monument and Cannon Street, serving London Underground, London Overground, National Rail, TfL Rail and Docklands Light Railway services. Liverpool Street will also be served by the

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<sup>1</sup> <https://gla.force.com/pr/s/>

Elizabeth Line. Cycle Superhighway 3 runs along Lower Thames Street as two-way segregated track, approximately 300 metres from the site.

### Surrounding context

8 The immediate surrounding context of the site includes a number of designated heritage assets. To the north, the Grade II\* listed buildings forming the Leadenhall Market, and the Grade II listed Ship Tavern, No 7-9 and 81-82 Gracechurch Street. To the west, opposite the site is the Grade II listed Credit Lyonnaise building. To the south are the listed buildings on Philpot Lane, including the Grade II\* listed No 7-8 and Grade II listed No 2-3. The site is not within a conservation area; however, the boundary of the Leadenhall Market Conservation Area adjoins the site to the north and east. Immediately to the west of the site is the boundary of the Bank Conservation Areas and the Eastcheap Conservation is located to the south of the site.

9 The wider heritage context includes a wide range of heritage structures within the City of London. A number of listed buildings, including the Grade I listed Lloyd's Building, are located the north along Leadenhall Street and Lime Street. An array of listed structures are located to the west of the site along Cornhill, Lombard Street and Clements Lane, including the Grade I listed Royal Exchange and the Churches of St Michael, St Peter, St Mary of Woolnorth, St Edmond and St Clement. To the south of the site are a number of listed buildings along Philpot Land and Eastcheap including the Grade I listed Churches of St Mary at Hill, St Dunsten in the East and St Margaret Patterns. Further listed buildings are located in the wider context on the south side of the River Thames, within the Borough High Street and Tooley Street Conservation Areas, including the Grade I listed Southwark Cathedral. Significant landmarks including The Grade I listed St Paul's Cathedral, Monument and Tower Bridge are located to the west, south and east, respectively. The wider context includes the St Helen's Place Conservation Area to the north; the Lloyd's Avenue, Fenchurch Street Station and Trinity Square Conservation Areas to the east; and the Laurence Pountey Conservation Area to the south west. The Tower of London World Heritage Site (which includes various listed buildings – including the Grade I Tower itself) is to east and falls within the Tower Conservation Area. In addition a number of listed structures and buildings are located within the local setting of the World Heritage Site, including the Grade I listed Church of All Hallows by the River, Trinity House and portion of the Old London Wall and the Grade II\* listed Former Port of London Authority Building.

10 A substantial amount of tall office and mixed use development has been undertaken in the immediate vicinity of the site and in the wider Eastern Cluster. This includes office-led developments at 20 Fenchurch Street (160 metres), 22 Bishopsgate (278 metres), The Leadenhall Building on Leadenhall Street (225 metres), 52 Lime Street (206 metres) and 100 Bishopsgate (172 metres).

### Emerging context

11 In terms of the emerging context further office-led tall building development is proposed in the eastern cluster with schemes at 1 Leadenhall Street (183 metres), 40 Leadenhall Street (154 metres) and 6-8 Bishopsgate (217 metres) are currently under construction and consents are in place for 1 Undershaft (300m), 100 Leadenhall Street (263 metres) and 50 Fenchurch Street (150 metres). There are also a number

of live planning applications for tall buildings in the area. This includes a 30-storey (146 metres) office-led mix use development at 55 Gracechurch Street immediately opposite the site to the south (LPA ref: 20/00671/FULEIA); the office-led proposals at the Site Bounded By Fenchurch Street, Mark Lane, Dunster Court And Mincing Lane ranging in height up to 35- storeys (149 metres) (LPA ref: 19/01307/FULEIA); and the 48-storey (197 metres) office-led development proposals at Bury House (LPA ref: 20/00848/FULEIA; GLA ref: 2020/6850/S1). The draft City Plan (2036) identifies the site within the emerging City Cluster Key Area of Change which identifies the area as a tall buildings location, on appropriate sites, and which seeks to accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport and public realm enhancements.

## Details of the proposal

12 The application seeks planning permission for the redevelopment of the site to include demolition of the existing office buildings and the construction of a 33 storey development with a maximum height of 155 metres (AOD) providing office use, flexible retail, a public viewing gallery, and associated public realm improvements works to adjoining streets and Philpot Lane and other works associated with the development including access and highways works. The layout of the development at ground floor level is shown below in Figure 1.



## Case history

13 An initial pre-application meeting was held with the GLA on 19 November 2019. GLA Officers advised that the principle of the office-led mixed use redevelopment of the site is strongly supported and that the design principles of the proposals were strongly supported. GLA officers welcomed further discussion on the massing and architecture of the building, response to the historic environment and LVMF views, the impacts of the development on wind microclimates, the proposed viewing platforms, urban greening and transport.

## **Strategic planning issues and relevant policies and guidance**

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan (2015) and the London Plan 2016 (Consolidated with alterations since 2011).

15 The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to Publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On 13th March and 10th December 2020, the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.

16 On 21st December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be taken into account as a material consideration on the basis described in the NPPF.

17 The following are also relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance;
- London Plan – Publication version (December 2020)
- City of London Draft City Plan (2036)
- Tower of London World Heritage Site Management Plan

18 The relevant strategic issues and corresponding policies are as follows:

- |                           |  |
|---------------------------|--|
| • Land use principle      | <i>London Plan; Central Activities Zone SPG; Night Time Economy SPG</i>                    |
| • Central Activities Zone | <i>London Plan; Central Activities Zone SPG</i>  |
| • Retail/Office           | <i>London Plan; Town Centres SPG; Central Activities Zone SPG</i>                          |
| • Urban design            | <i>London Plan; Character and Context SPG</i>  |
| • Strategic Views         | <i>London Plan; London View Management Framework SPG</i>                                   |
| • Historic Environment    | <i>London Plan; World Heritage Sites SPG</i>   |
| • Inclusive access        | <i>London Plan; Accessible London SPG;</i>   |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;</i> |
| • Transport               | <i>London Plan; the Mayor's Transport Strategy.</i>  |
| • Tourism/Leisure         | <i>London Plan; Town Centres SPG; Central Activities Zone SPG</i>                          |

## **Principle of development**

### CAZ strategic function and proposed office use

19 The site lies within the Central Activities Zone as identified in the London Plan. It is also identified in the City's Local Plan as a part of a Primary Shopping Centre.

London Plan Policy 2.11 and the Publication London Plan Policy SD4 establish the strategic functions of the CAZ and support offices and retail in shopping destinations. London Plan Policy 4.2 and the Publication London Plan Policy E1 in particular, give strategic support to improvements to the quality, flexibility and adaptability of office space of different sizes as part of new office provision, refurbishment and mixed use development in the CAZ.

20 A comparison between the existing and proposed floorspace by land use is set out below:

<b>Use</b>	<b>Existing</b>	<b>Proposed</b>	<b>Net change</b>
Office (Class B1a)	15,045	69,716	+ 54,671
Retail (Class A1)	11,696	0	- 11,696
Flexible retail (Class E and sui generis)	0	1,715	+1,715
Public access spaces and gallery	0	1,495	+ 1,495
<b>Total</b>	<b>26,741</b>	<b>72,926</b>	<b>+ 46,185</b>

Table 1: Existing and proposed land uses

21 The existing building, whilst providing relatively modern office accommodation, was constructed primarily to provide the retail department store on the lower floors. The proposals would result in a significant uplift in the overall quantum of office floorspace as well as greater quality, flexibility and adaptability of the workspaces provided, ensuring the provision can adapt to the changing requirements of future occupiers and a range of types and sizes of office. Noting that the Publication London Plan anticipates demand for office floorspace is expected to be greatest within the CAZ and Isle of Dogs, comprising 59% of overall projected demand, the proposed development would deliver a substantial quantitative and qualitative improvement to the office stock within the CAZ and this is strongly supported in land use terms, in accordance with London Plan Policies 2.10, 2.11 and 4.2 and Policies SD4, SD5 and E1 of the Publication London Plan.

#### Affordable workspace

22 Policy E2 of the Publication London Plan provides that larger office proposals should consider the scope for provision of some flexible workspace suitable for micro, small and medium sized enterprises. In addition, Policy E3 of the Publication London Plan encourages the use of planning obligations to secure affordable workspace in specific circumstances and locations. Emerging City Local Plan policy S4 encourages the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City. The workspace provision has been designed with floorplates adaptable to suit a range of businesses, including SME, creative and tech companies. Given this capacity, the applicant is encouraged to consider a quantum of affordable workspaces to accommodate new and growing businesses within the City.

#### Flexible retail provision and loss of retail floorspace

23 Policy SD4 of the Publication London Plan supports proposals which enhance the vitality, viability, adaptation and diversification of existing retail clusters within the CAZ. Policy E9 seeks to ensure the management of retail clusters has sufficient regard to the priorities of the London Plan, specifically in terms of maintaining and enhancing town centre vitality, viability, diversity, sustainability and place-making. The site is located within the Leadenhall Principal Shopping Centre, one of 5 CAZ retail clusters identified within the local City Local Plan. Local Plan policy resists the loss of retail frontage and floorspace within the PSCs, prioritising the presence of retail at ground floor level, but where supports the presence of non-A1 class uses within the cluster where these do not adversely impact on its functioning and amenity.

24 As set out in Table 1 above, the proposals would result in the loss of the existing Class A1 retail from the site. The proposals introduce 1,715 sqm of flexible retail uses falling under Class E and Sui generis (anticipated to comprise a mix of flexible retail, market-type pop up retail, hot food takeaway and drinking establishments) at ground floor level; however, this would equate to an approximate loss of 9,981 sqm of retail floorspace from the site.

25 No objection is raised to the loss of retail from the site. Whilst Local Plan policy supports the retention of large retail units in prominent locations, the loss of the existing retail store would not adversely impact on the vitality or viability of the retail cluster which, as set out in the emerging Local City Plan, is centred on Leadenhall Market as the primary retail destination.

26 The introduction of a mix of flexible retail, market-type pop up retail, hot food takeaway and drinking establishments is supported in view of the site's location within a CAZ retail cluster, the aspiration for active frontages at ground floor, the introduction of a diverse retail offer which would enhance place-making and the vitality of the cluster and the introduction of the arcade component activating a new public route through to Leadenhall Market and complementing the market through enhanced access and supporting retail function. The proposals are considered to accord with London Plan Policies 2.15, 4.7 and 4.9 and Policies SD6 to SD8 and E9 of the Publication London Plan. A retail strategy should be secured by condition to ensure appropriate management of the diverse range of uses proposed. Public access through the arcade at ground floor level should be secured by obligation.

### Housing and Affordable housing

27 London Plan Policy 4.3 promotes mixed use development, including housing, to support increases in office floorspace and states that where an increase in office floorspace is proposed and where this increase is above a justified local threshold, which is 500 sq.m. (GIA) in the City of London, as a general principle, applicants should be required to provide housing and other uses on-site or nearby to create mixed use neighbourhoods. Within the CAZ and the City of London, the London Plan approach allows for a degree of flexibility with respect to the provision of mixed uses and provision of housing and exempts the City from providing mixed uses on-site, if it compromises broader objectives such as sustaining important clusters of business activity. Under such circumstances, contributions to off-site housing provision should be sought as a planning obligation in accordance with the City Corporation's Planning Obligations SPG Tariff Calculation. The applicant proposes to provide a contribution towards affordable housing in this regard which is strongly supported. Full details of

the affordable housing contribution should be provided and suitably secured within the S106 agreement.

### Publicly accessible spaces

28 Prominent tall buildings, such as that proposed here, should incorporate free to enter publicly accessible areas within their design in accordance with London Plan Policy 7.7 and Policy D8 of the Publication London Plan. Such spaces should generally be located at the top of the building to provide wider views across London. In this instance, the applicant is proposing two publicly accessible roof gardens and viewing galleries (1,125 sq.m.) on Levels 29 and 30 of the building. This would be served by dedicated lift accessed from the ground floor of the tower. The terraces would provide a glazed internal double height space and would afford elevated views north, west and south facing views over the immediate surrounding area. Subject to free of charge public access being secured by Section 106 agreement, the provision would contribute to the network of free-to-enter viewing galleries in the City of London and are considered to meet the policy requirements set out above.

### Principle of development - conclusion

29 In summary, the principle of the proposed office-led mixed use redevelopment within the CAZ, comprising a significant quantitative increase and qualitative enhancement to the existing office and commercial floorspace, and including a diverse retail offer and new public routes, as well as an elevated public viewing gallery, is strongly supported.

## **Urban design**

30 Good design is central to all objectives of the London Plan and the Mayor's Publication London Plan. Policies contained within chapter seven of the London Plan, and chapter the of the Publication London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

### Site Layout

31 The scheme has evolved positively through pre-application advice and the design team have worked to address the key issues raised, including a clear approach to defining key pedestrian routes and demonstrating how the development will connect with the surrounding existing and future routes in line with the aspirations of the City Cluster Vision. The ground floor layout successfully integrates with Leadenhall Market and wider pedestrian desire lines in terms of sizing and alignment of proposed routes and spaces. The inclusion of a publicly accessible route through the development strengthens the site's integration with pedestrian routes to the north and enhance permeability through the site which is strongly supported.

32 The proposed open space beneath eastern portion of the building for flexible retail/public uses/loading bay lift access supports the location of basement level servicing and plant and allows the majority of public facing edges to be activated. This approach is supported in urban design terms. Further consideration of the

implications of this approach in terms of servicing and delivery are set out in the Transport section below.

33 The overall design, layout and landscaping of the proposed public spaces within the site would be of a high quality; the visualisations and landscape strategy submitted by the applicant alongside the application demonstrate that the scheme would provide a series of attractive and legible public spaces which would respond positively to the character and context of the surrounding area, whilst also providing enhanced permeability. The provision of active frontages has been maximised, with flexible retail units, capable of range of providing functions ranging from retail spaces and market-type pitches, to performances and sporting events which will add visual interest and contribute to the creation of a vibrant public realm. Further clarity is required on the level of public access through the internal passageway and how the public spaces will function at night. The applicant is encouraged to follow the principles and the best practice guidance set out in the Public London Charter.

#### Tall buildings, height, massing and architectural quality.

34 London Plan policy 7.7 and Policy D9 of the Publication London Plan set out the criteria against which tall and large buildings should be assessed and establish support for the development of tall buildings where they create attractive landmarks enhancing London's character, and help to provide a catalyst for regeneration, where they are acceptable in terms of design and impact on their surroundings. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in development plans and criteria against which impact should be assessed, including the requirement to take account of, and avoid harm to, the significance of London's heritage assets and their settings and the Outstanding Universal Value (OUV) of World Heritage Sites.

35 As noted above, the site is located within the Eastern Cluster as defined by the City Local Plan. Adopted and emerging policy encourages new tall buildings on suitable sites within the Eastern Cluster, having regard to the impact on the City skyline, the character and amenity of their surroundings, the significance of heritage assets, airport safeguarding and the provision of high quality public realm at street level. The proposed tall building would form part of an established and evolving cluster of tall buildings which form part of London's iconic skyline. In view of this context and the above mentioned strategic and local policy designations, the principle of the development of a tall building within this part of the CAZ is acceptable in principle. Notwithstanding the in-principle suitability of the site to accommodate a tall building, the development must also have particular regard to the protection of the OUV of the Tower of London World Heritage Site.

36 The architectural quality of the building would be of a high standard and the massing and design has evolved following a detailed pre-application process of engagement and design review involving the City of London Corporation, the GLA, and Historic England. The materiality of the tower has been well-considered in relation to its immediate and wider context. The articulation of the base, podium and tower elements is successful and results in a well-proportioned building that responds positively to the immediate and wider townscape. The tripartite sculptural form of the tower element is successful and mediates between the faceted form of the Eastern Cluster and the more organic form of 20 Fenchurch Street in longer range views. The

integration of greened terraces adds dynamism to the architecture, details of the irrigation system and plant species (having regard to species suitable for the harsher environments towards the upper levels of the tower) should be secured to ensure long term maintenance of planting is safeguarded. Subject to clarity on the proposed greening, GLA officers are of the view that the design and architectural quality of the building is of high quality.

### Microclimate impacts

37 The supporting ES comprises an assessment of the impact of the building on wind and pedestrian comfort levels, in line with City of London's Wind Guidelines (comprising wind tunnel testing and CFD). The assessment identifies that the proposed development is not expected to result in significant adverse wind microclimate effects impacts to neighbouring buildings or open areas within and surrounding the development, across the year subject to recommended mitigation measures.

38 Further to this, detailed modelling has been undertaken to assess the potential for daylight, sunlight, overshadowing and solar glare impact on the surrounding area more generally. The findings of this modelling should be assessed by the City of London Corporation, and should planning permission be granted, conditions should be secured to ensure microclimate impacts, including wind and solar glare, are appropriately mitigated.

### Fire Safety

39 A fire statement prepared by suitably qualified personnel at Arup has been submitted with the application in accordance with Policy D12 of the Intend to Publish London Plan. The measures contained within the statement and the additional measures to be considered at the detailed design stage should be robustly secured as part of any planning permission.

### Inclusive design

40 London Plan Policy 7.2 and Policy D3 of the Publication London Plan require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

41 Level access would be provided to all of the proposed office, retail and visitor floorspaces and facilities with lift access provided to all floors. Measures are proposed to mediate level changes across the site, suitably addressed by providing gentle slopes at acceptable gradients to ensure wheelchair access and to enable those with mobility issues to move through the site in a safe and convenient manner. As such, the application complies with the London Plan and Publication London Plan in respect of inclusive design.

## **Strategic Views**

42 London Plan policies 7.11 and 7.12 and policies HC3 and HC4 of the Publication London Plan identify the strategic views within London and set out the

assessment framework for development that will impact upon strategic views, protected vistas and their landmark elements. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks. The policies also seek to protect views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value. Guidance on the management of designated views is set out in the London View Management Framework SPG.

### Protected Vistas

43 The supporting Heritage, Townscape and Visual Impact Assessment (HTVIA) demonstrates that the proposed building would be visible in two Protected Vistas orientated towards St Paul's Cathedral from Parliament Hill (LVMF 2A.1) and Kenwood (LVMF 3A.1).

44 Whilst falling within the St Paul's Cathedral from Parliament Hill (LVMF 2A.1) and Kenwood (LVMF 3A.1) protected vistas, the proposal is located to the east of the St Paul's within the established cluster of tall buildings which is identified in the LVMF SPG as complementary to the silhouette of the City. The HTVIA demonstrates that the development would be largely obscured from both views by towers at the Barbican Estate and as such would have a negligible impact on the silhouette of the cluster. Having considered this alongside officer's independent assessment of the impact, GLA officers consider the proposals would not harm the characteristics and composition of the view or the ability to appreciate St Paul's Cathedral from Parliament Hill.

### London Panoramas

45 The development would be visible within the following London Panoramas

LVMF 1A.1 – Alexandra Palace: The Viewing Terrace  
LVMF 4A.1 – Primrose Hill: The Summit  
LVMF 5A.2 – Greenwich Park: The General Wolfe Statue  
LVMF 6A.1 – Blackheath Point: The Point

46 Having reviewed the impact of the scheme, and the assessment made in the supporting HTVIA, GLA officers consider the proposed tall building would have a neutral to positive impact on the prevailing pattern of tall buildings and existing clusters in these panoramas, particularly in 4A.1 – Primrose Hill, where the development serves to consolidate the Cluster's profile and composition. As such, GLA officers consider the proposed tall building fits within the prevailing pattern of buildings and spaces, and would not detract from the panorama as a whole nor harm the setting of St Paul's Cathedral, in accordance with London Plan Policy 7.12 and Policy HC4 of the Publication London Plan.

### River Prospects

47 The development would impact on the following LVMF River Prospects:

LVMF 10A.1 – Tower Bridge: The North Bastion  
LVMF 11B.1&2 – London Bridge: Downstream  
LVMF 15B.1&2 – Waterloo Bridge: Downstream  
LVMF 16B.1 – The South Bank: Gabriel's Wharf

48 The HTVIA demonstrates that the development would be highly prominent in LVMF 15B and 16B with the building sited to the left of 20 Fenchurch Street. In these views, the tripartite stepped form successfully mediates between the heart of the cluster and the outlying 20 Fenchurch Street, improving the legibility of the cluster as a more consolidated group. St Pauls Cathedral stands separate from the cluster in this view and GLA officers consider the improvement to the cluster's legibility enhances the setting of the Cathedral in this view. The HTVIA shows that the development is highly visible in River Prospect views from London Bridge (LVMF 11B.1 & 2). Whilst highly visible, it would appear as a component part of the established cluster of tall buildings. If approved, the forthcoming development at 55 Gracechurch Street would be largely obscure the proposal from this view. In LVMF views 10A.1 and 25A 1&2, the HTVIA demonstrates that the development would be almost entirely obscured by existing development at 20 Fenchurch Street and thus the proposal has negligible impact on the ability to appreciate the key landmarks, or the silhouette of the Tower of London World Heritage Site, from this view.

49 Overall, GLA officers consider that the proposal would enhance the overall juxtaposition of buildings and landmarks from the river prospect views, in accordance with London Plan Policy 7.12 and Policy HC4 of the Publication London Plan.

#### Townscape View - LVMF 25A.1-3 – The Queen's Walk at City Hall

50 The site is visible from within the townscape view from the Queen's Walk to the Tower of London World Heritage Site. A Protected Vista is included from Assessment Point 25A.1 and a Protected Silhouette is applied to the White Tower between Assessment Points 25A.2 and 25A.3. The development is located to the left of the World Heritage Site and is almost entirely obscured by 20 Fenchurch Street. The Protected Silhouette of the White Tower is therefore not affected by the proposed development.

#### Strategic Views Conclusion

51 The proposed development protects significant views of important buildings, townscape, riverscape and skylines and does not compromise the ability of viewers to recognise and appreciate identified landmarks. As such, the proposed development is in compliance with London Plan Policies 7.11 and 7.12, Publication London Plan Policy HC3 and HC4 and the requirements of the LVMF SPG.

## **Heritage**

52 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should 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'.

53 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Any harm to a heritage asset should be given substantial importance and weight in any planning balance. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

54 London Plan Policy 7.8, states that development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Policy HC1 of the Publication London Plan further specifies that the cumulative impacts from incremental change from development on heritage assets and their setting should be actively managed and that development proposals should avoid harm.

55 Paragraph 184 of the NPPF recognizes that World Heritage Sites are internationally recognised to be of Outstanding Universal Value and, as such, are afforded the highest significance of all designated heritage assets. London Plan Policy 7.10 states that development should not cause adverse impacts on World Heritage Sites or to their settings (including any buffer zones). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. Policy HC2 of the Publication London Plan further states that development, in WHS and their settings, including buffer zones, should conserve, promote and enhance their Outstanding Universal Value, or the authenticity and integrity of their attributes and provide that when considering planning applications, appropriate weight should be given to the provisions of World Heritage Site Management Plans.

#### Tower of London World Heritage Site and listed buildings therein and the Tower of London Conservation Area

56 The HTVIA demonstrates that the proposed tall building would impact the Tower of London World Heritage Site. As noted in the strategic views section above, the development would be visible in LVMF views from Tower Bridge and the Queen's Walk assessment points. In both instances, given the positioning of the site away from the WHS and the position of the development relative to 20 Fenchurch Street, the Protected Silhouette of the White Tower and the wider setting of the WHS is not affected by the proposed development in these strategic views. The proposed development would be visible from within the Inner Ward above the roofline of the Grade I listed Beauchamp Tower. In this view the building would appear as a small projecting component, lower and behind the significantly more prominent 20 Fenchurch Street. Consented proposals at 1 Leadenhall and 50 Fenchurch Street would also appear prominently above the roof line of in this view.

57 The building would appear in the backdrop to the base of the bell tower of the Grade I listed St Peter ad Vincula in a view north-west from the Inner Ward. In this view the building would fill the clear sky in the narrow space between the bell tower column and 20 Fenchurch Street. As with the above view, this visibility is in addition to the dominant massing of 20 Fenchurch Street. The supporting HTVIA demonstrates that any perception of the development would be seen in the context of existing and emerging cumulative development, specifically 20 Fenchurch Street and the tall buildings within the eastern cluster including The Leadenhall Building, 22 Bishopsgate, 52 Lime Street and 30 St Mary's Axe, which are visually prominent above the roof lines of the listed buildings from these views. Notwithstanding this, the proposed tall building would cause additional 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. The development would also appear above the concentric defences, including the Grade I listed St Thomas's Tower where it rises above the historic structure. In this view 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.

58 Elements of the proposed development are not sufficiently sympathetic to the significance of heritage assets within the WHS, specifically the Grade I listed St Peter ad Vincula and St Thomas's Tower and as such fail to conserve their significance. As a result, the development would compromise the ability to appreciate the authenticity and integrity of these attributes within the WHS contrary to the aims of London Plan Policy 7.8 and 7.10 and Policies HC1 and HC2 of the Publication London Plan. Given harm has been identified to key 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. As with the assessment of the impact on the individual buildings above, GLA officers judge the level of harm to be less than substantial.

59 In addition to the above, the development would also impact on the Tower of London Conservation area which falls within the local setting of the WHS as set out in the Tower of London HRP Management Plan. View 7 of the HTVIA demonstrates 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 and encroaching on the open sky above the Grade II\* listed former Port of London Authority Building. In this view, GLA officers consider the development would cause additional cumulative harm to the setting and significance of the Conservation Area and the Grade II\* listed building. This harm is considered to be less than substantial.

### Designated Heritage Assets

#### *St Paul's Cathedral*

60 The Grade I listed St Pauls Cathedral's significance is derived from its architectural interest, as Sir Christopher Wren's 18<sup>th</sup> Century Masterpiece, and one of

the most significant baroque buildings in England, and its historical interest, as one of London's the most recognisable buildings dating back to its reconstruction following the Fire of London in 1666. The setting of the Cathedral as a centre piece in London is varied, identified as a Strategically Important Landmark, important long distance views of the Cathedral are protected and managed through the London Plan and the LVMF SPG. The modern tall buildings of the eastern cluster to the east of the Cathedral form part of the wider setting. The local setting is comprised of the Churchyard, Festival Garden and Carter Lane gardens and the varied mix of relatively low rise modern and historic buildings that form part of the St Paul's Cathedral Conservation Area. As set out above in the assessment of strategic views, where visible in LVMF protected views and panoramas, the development is largely obscured by existing tall buildings or forms a complimentary part of the established eastern cluster. In these long distance views, the proposal would not impact on the wider setting or significance of the Cathedral. The most prominent strategic views of the Cathedral are from London Bridge and Waterloo Bridge River Prospects, with the Waterloo Bridge views being the most significant. In this view, the eastern cluster appears to the right, but is distinct enough from the Cathedral to maintain visual separation. The development is positioned to the right of the cluster mediating between the outlying 20 Fenchurch Street and the rest of the cluster. Owing to its position to the right, away from the Cathedral and its moderating effect on the cluster's silhouette, the prominence of the Cathedral as a standalone centrepiece, from this view, is not diminished. The HTVIA further demonstrates that the development would not be visible in any views along Fleet Street in a sequence of kinetic views as one moves east along Fleet Street. In light of the above, GLA officers consider the development would have no impact on the setting or significance of the Cathedral.

#### *Other designated Heritage Assets*

61 The HTVIA demonstrates the visual impact of the development on The Monument from the LVMF view from Queens Walk and in northward views from London Bridge and Fish Street Hill. In the LVMF view the development would be partially visible as part of the cluster to the east of, and separate from, the projecting column and would have no impact on the significance of the landmark. In other views, whilst representing a change to the northern setting of the landmark, this would be in the context of the existing eastern cluster of which the development would form an attractive and appropriately scaled addition. As such, GLA officers consider the development would have no impact on the significance of the Grade I listed and scheduled ancient monument.

62 In views looking west toward Tower Bridge, the development would be partially visible as a smaller building projecting from, but largely obscured by, the taller and more prominent 20 Fenchurch Street. In these views the development would have a negligible impact on the contribution made by the setting to the ability to appreciate the significance of the bridge. However, GLA officers consider further analysis of the development's contribution to the setting and how this impacts on the ability to appreciate the significance of the bridge should be undertaken, specifically in views from River itself and in views looking west from Shad Thames further east. As such, GLA officers consider that insufficient information has been provided to fully assess the impact on the significance of Tower Bridge.

63 The development would alter the contribution made by the setting to the ability to appreciate the significance the Grade II\* listed Leadenhall Market through the introduction of a significantly taller building on the proposal site, these alterations would not impact on the significance of the asset which is derived from its historic fabric and the architectural interest of its entrances, internal routes and the quality of the covered market spaces, these characteristics also strongly inform the significance of 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, however, 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 public realm works to Lime Street and improved pedestrian connectivity between Fenchurch Street and Leadenhall Market are modest enhancements. GLA officers consider that the level of harm to the conservation area would be less than substantial.

64 The contribution made by the setting to the ability to appreciate the significance of the Grade II listed Ship Tavern and 81-81 Gracechurch Street would be altered by the development. The setting of the pub is characterised by the narrow and enclosed street layout. At street level the relationship between the listed pub and the podium level of the development would be similar to the existing condition given the stepping down of the podium towards the conservation area. GLA officers consider the development would not impact on the significance of the listed former pub building.

65 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.

66 The Grade I listed Church of St Peter and listed properties at 7 Gracechurch Street and listed buildings along Leadenhall Street and Lime Street are at a distance or appreciated from a position whereby their significance would not be altered by the development.

67 With the exception of 1 Cornhill, owing to the height of surrounding development, the orientation of listed buildings and their distance from the proposal, the development would have a negligible impact on the contribution made by the setting to the ability to appreciate the significance of the listed buildings and churches along Cornhill and at Bank junction. 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.

68 Where visible in long range views from within the wider Bank Conservation Area, the development would form part of the established wider setting which includes the towers of the eastern cluster. However, 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. Having considered views 31 of the HTVIA, the proposal would introduce a significant new

element in easterly views along Lombard Street, this would be viewed in the context of the existing 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 Grade I listed churches of St Edmund and St Mary Woolnorth.

69 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, through the introduction of new development of significantly greater scale opposite, 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 development in the immediate setting and tall buildings of the eastern cluster in the background. GLA officers consider the harm to the significance of this building to be less than substantial. Owing to the height of existing buildings relative to the narrow width of Lombard Street and King William Street and the orientation from which the listed buildings are appreciated, the significance of the cluster of listed buildings along Lombard Street and King William Street (with the exception of the Church of St Mary Woolnorth considered above) would not be altered by the development.

70 LVMF views 18 and 19 and view 20 of the HTVIA illustrate the visual impact on the Grade II listed properties south of Lower Thames Street. Within these views the eastern cluster provides a backdrop to 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. The proposed building would appear closer to the identified listed buildings, affecting the silhouette of Adelaide House. GLA officers consider that the level of harm would be less than substantial.

71 The proposals would alter the setting of the collection of Grade II and II\* listed buildings along Philpot Lane (2-3 and 7-8 including 4 Brabant Court), Eastcheap (23-25, 33-35 and 43) and the Grade I listed Church of St Margaret Pattens and the setting of the Eastcheap Conservation Area through the introduction of new development of significantly greater scale, and public realm improvement works to Philpot Lane and at the top of Rood Lane, the scale of the new development would, in most cases be appreciated in northward views over the roofs of buildings on Eastcheap and along Philpot Lane. This would be viewed in the context of the existing office development in the immediate and wider setting, 20 Fenchurch Street in particular has a dominating presence in the immediate setting. The HTVIA assesses that while these aspects, along with the proposed public realm improvements on the northern part of Philpot Lane, would be an enhancement in their setting, it would have no effect on their significance. GLA officer concur with this assessment.

72 The development would be visible in views from near and as part of the setting of the Grade I listed Southwark Cathedral and the Grade II\* listed Olaf House on the south side of the River Thames. Owing to their distance from the proposal, the development's positioning as part of the eastern cluster and the high quality of the proposed architecture, GLA consider the development would not impact on the significance of these buildings.

#### Heritage assets not considered

73 Whilst the majority of heritage assets potentially affected have been identified, the assessment does not identify the Grade I listed Custom House and Billingsgate Market and the Grade II listed Cannon Street Station towers as assets requiring assessment in their own right. These are prominent assets that hold significant heritage value owing and would be directly impacted by the development in northward views from the south side of the River Thames. Given the appearance of the building in the backdrop of these assets it is likely the development would cause some harm.

74 However, in the absence of a sufficiently detailed description of the significance of these assets, or the contribution made by their setting, GLA officers are unable to make a full assessment of the heritage impact of the proposal. The applicant should therefore provide an assessment of the potential impact of the development on these assets.

#### Heritage impact conclusion

75 GLA officers have concluded that the proposal would result in less than substantial harm to the Tower of London, 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 and Leadenhall Market; the Grade II listed 81-82 Gracechurch Street, 39-40 Lombard Street, Adelaide House; 1 Cornhill and Cannon Street Station; The Tower of London World Heritage Site and the Grade I listed St Peter ad Vincula Chapel and St Thomas's Tower as assets in their own right.

76 In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight should be given to the asset's conservation, in a manner appropriate to their significance. Given the status of the Tower of London as a World Heritage Site, which is considered to be a heritage asset of international importance, the decision maker must give particular importance and weight to any identified harm to this asset.

77 The public benefits arising from the development include enhanced pedestrian permeability through the site, between Fenchurch Street, Ships Tavern Passage and Leadenhall Market; public realm enhancement to the south east fronting Fenchurch Street and Lime Street and Philpot Lane; a public viewing gallery at Levels 29 and 30, totalling around 1,125sqm of floorspace and the delivery of over 68,000 sq.m. of commercial floorspace as part of a high quality office-led mixed use scheme within the CAZ, which would strengthen office provision within this city cluster location and would contain, 1,700 sq.m. of flexible retail floorspace contributing to the retail offer within the Leadenhall Market Principal Shopping Centre. In total, the scheme is estimated to deliver approximately 4,300 jobs across the site.

78 As noted above, the development would cause harm to several heritage assets, many of which are of high significance. Furthermore, GLA officers have identified the requirement for further assessment of potential impact in relation to

Tower Bridge, Billingsgate Market, the Custom House Canon Street Station and 1 Cornhill. Following receipt of the additional material sought, GLA officers will be in a position to make an informed assessment of the overall heritage impact. In addition, further clarity is required in relation to the affordable housing contribution, as well as details of how the public benefits will be secured/delivered more generally as part of the planning permission. As such, all the above information is required before GLA officers would be able to make the judgement on the heritage balance.

## **Climate Change**

### Circular Economy

79 The Mayor's Publication London Plan Policy GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.

80 As such, and in line with Publication London Plan Policy SI7, a Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement.

### Energy

81 The applicant has submitted an energy assessment in accordance with London Plan Policy 5.2 and Policy SI2 of the Publication London Plan. The domestic element of the development is estimated to achieve a reduction of 30% in regulated CO2 emissions compared to a 2013 Building Regulations compliant development.

82 The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. Further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. Detailed comments in relation to the required additional information have been provided separately to the Council.

### Flood Risk

83 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and Publication London Plan policy SI.12.

84 The surface water drainage strategy for the proposed development complies with London Plan policy 5.13 and Publication London Plan policy SI.13 on the provision the detailed design. Further information on how SuDS elements will be included in the development, the maintenance plan and an agreement in principle with TWUL regarding the change in discharge rates should be provided.

85 There is insufficient evidence on what Water Efficiency measures will be put in place and what level of reduction will be targeted. The proposals as such do not comply with London Plan policy 5.15 and Publication London Plan Policy SI.5

### Green Infrastructure

86 The proposed development takes a very positive approach to integrating urban greening across the façade of the building, and at podium and roof levels. This is reflected in the UGF of the proposed development, which the applicant has calculated to be 0.51. This greatly exceeds the policy requirement of 0.3 for predominantly commercial development set by Policy G5 of the Publication London Plan and is strongly supported.

### **Transport**

#### Trip Generation and public transport impact

87 Further improvements are required to the trip generation analysis. The trip generation data tables should include Trains Per Hour (TPH) at the specific stations assessed rather than using a more generous TPH rate from other points along the LU line they serve. The applicant should also assess all LU stations within walking distance of the development, not just Monument. Whilst a Station Capacity Assessment has been provided for Monument, a full Line Load Impact Assessment should be undertaken using TfL eRail Plan data.

88 The proposed trip rates for new travel expected to be generated by the new development are likely to be acceptable in principle but the TA should be updated prior to determination to specify where the rates in Table 5.1 originate from and why they are being used.

#### Cycle Parking

89 1,002 long stay cycle parking spaces are proposed at the lower ground level in line with London Plan Policy T5 standards. 85% would be Two-Tier cycle racks, 10% folding bicycle lockers, and 5% Sheffield stands and 3 would be tricycle parking spaces. All of the long-stay cycle parking aisle widths must be at least 2.5m beyond the lowered frame to comply with the London Cycling Design Standards). In addition, access to a number of cycle racks proposed at the lower ground floor should be amended to provide wider access. At least 5% of cycle parking will be suitable for larger and adapted cycles which is in line with supporting London Plan policy T5.B.

90 The proposals provide showers and lockers within the Lower Ground Mezzanine and Lower Ground levels, which is welcomed. Two dedicated cycle parking lifts and a gullied cycle stair are proposed, accessible at ground floor level adjacent to a dedicated cycle entrance proposed in Ship Tavern Passage. Cycle lift capacity should be increased to at least 2 cycles per lift, in order to reduce potential waiting times and improve the flow of cycle parking users. LCDS specifies a maximum of two set of doors between cycle stores and the development surroundings. Further clarification is required on how cycling access/egress routes along Lime Street can be shared with service vehicles in line with Vision Zero objectives in Publication London Plan policy T7.

91 22 short stay cycle spaces are proposed whereas 102 spaces would be required. The location of short stay cycle spaces is nonetheless supported as it would relate well to expected pedestrian desire lines. The applicant proposes 20% more long stay cycle parking to maintain pedestrian comfort around the site. Due to space constraints and unique characteristics of this development site, offsetting short stay with long stay cycle parking is considered reasonable in this case. The detailed design and delivery of all cycle parking should be secured by condition.

### Cycling infrastructure and Cycle hire

92 Development proposals should support the delivery of new and improved cycling infrastructure to help remove barriers to cycling. TfL's Cycle Route Quality Criteria Check tool should be used to assess the route between the site and CS3 prior to determination, to show whether segregation or street changes such as removal of on-street car parking are needed to support optimal cycle routes to the site in line with Publication London Plan policy T5.A1.

93 The nearest Cycle Hire docking station at Eastcheap, is the 30<sup>th</sup> busiest out of over 800 in London. This development would increase demand for Cycle Hire and increasing Cycle Hire capacity would directly benefit employees and visitors of the new development, supporting compliance with London Plan policy T5. A contribution of £220,000 to fund a new Cycle Hire docking station in the vicinity is therefore required.

### Healthy Streets and Vision Zero

94 The development proposes public realm improvements including a new pedestrian route from Ship Tavern Passage to Fenchurch Street facilitating shorter pedestrian trips in line Publication London Plan Policy T2. Public realm improvements also extend to the improvement of footways, lighting, the installation of new trees on Lime Street and a proposed super crossing across Fenchurch street.

95 The proposed realignment of the junction between Philpot Lane and Lime Street and the widening proposed of the eastern pavement of Lime Street and the western pavement width of Philpot Lane would improve Pedestrian Comfort Levels (PCL) around the site. This will be enabled by the relocation of a taxi bay to the south and a removal of yellow lines along Fenchurch Street. This is strongly supported in line with Publication London Plan policy D8 and should be secured by section 278 or 106 agreement as appropriate. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design. The Transport Assessment (TA) has identified two collision clusters where deaths and serious injuries have occurred in the recent highway safety record. These are at the junction of Gracechurch Street, Lombard Street and Fenchurch Street, and the junction of Fenchurch Street and Philpot Lane. The applicant should consider measures to mitigate any safety risk and deliver measures accordingly.

### Pedestrian Comfort Levels (PCL)

96 The proposals are supported by a PCL assessment which is welcomed. The growth factor assumed for future baseline pedestrian movement is acceptable in principle, as is the 10% diversion assumption for the new through-route. However, clarity should be provided on the exact methodology used to calculate future PCLs. Further discussion is welcomed about this matter and potential mitigation including footway widening on Gracechurch Street.

97 It should be noted that the footway widening currently implemented at this location as part of the Streetspace for London programme is temporary. The highway works and planning obligations proposed to support this development should therefore be updated prior to determination to ensure that they will be robust and deliverable, with sufficient flexibility for if the Streetspace for London works either become permanent or are removed.

98 If the widened footways are made permanent, it may be appropriate for this development to fund the physical works and approvals required to deliver that, given that it would directly benefit employees and visitors of the new development, and ensure policy compliance against the strategic transport policy of the Publication London Plan.

### Car Parking

99 The proposal is car-free except for one accessible parking space proposed at the ground level, accessed from Lime Street. The disabled car parking space proposed would have an electric vehicle charging point which is supported in line with Publication London Plan policy T6.3.

100 A Parking Design and Management Plan (PDMP) should be secured by condition, and discharged prior to commencement of construction. This should include details for the design and management of all parking including LCDS-compliant cycle parking.

### Deliveries and Servicing

101 Deliveries, servicing and refuse collection are proposed within a basement area with four loading bays, storage spaces and a turntable large enough for 10m rigid vehicles, accessed from flatbed vehicle lifts via Lime Street. The design, number of vehicles, access and hours of operation are considered reasonable and should be secured by condition, though the applicant should clarify how access to the disabled parking space would be retained. A full Deliveries and Servicing Plan (DSP) should be secured by condition and discharged in consultation with TfL due to the close proximity of the TLRN. The multi-use of the basement area loading bay is robust in principle as deliveries and servicing is restricted. As part of the retail strategy condition, referred to earlier in this report, the applicant should confirm how the management of the pop-up retail floorspace will be maintained over the lifetime of the development in light of the dual use of this space.

### Construction

102 An outline Construction Logistics Plan (CLP) has been submitted which includes proposals for two loading lanes, one located on Fenchurch Street and the

other on Gracechurch Street. No construction access should take place directly from the TLRN at Gracechurch Street. Any proposals for construction vehicles to use the Gracechurch Street, Lombard Street and Fenchurch Street junction should be supported by an RSA to determine the safety of vehicle movements in line with the Mayor's Vision Zero agenda. A full CLP should be secured by condition. All construction proposals in the full CLP should also support the Mayor's Vision Zero Action Plan.

## **Local planning authority's position**

103 City of London Corporation officers are minded to recommend the application for approval.

## **Legal considerations**

104 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

## **Financial considerations**

105 There are no financial considerations at this stage.

## **Conclusion**

106 London Plan and Publication London Plan policies on offices, the CAZ, town centres, urban design, tall buildings, inclusive design, strategic views, heritage assets, world heritage sites, climate change, sustainable urban drainage, urban greening and transport are relevant to this application. Whilst the proposal is strongly supported in principle, the application does not yet fully comply with the London Plan and the Publication London Plan as set out below:

- **Principle of development:** The principle of the proposed office-led mixed use redevelopment within the CAZ and CAZ retail cluster is strongly supported in principle. The proposal would provide a significant quantitative increase and qualitative enhancement to the existing office and retail offer. Further clarification is required in relation to the provision of affordable workspace, management of the diverse retail offer, the affordable housing contribution and public access. The provision of additional public space and publicly accessible viewing gallery is supported.

- **Urban design:** The development layout is strongly supported and the height and massing is acceptable in strategic planning terms, noting associated strategic views and heritage considerations. Overall, the scheme is of a high design and architectural quality.
- **Heritage:** The development would result a degree of harm to the Tower of London, 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 Markey; the Grade II\* listed Former Port of London Authority Building and Leadenhall Market; the Grade II listed 81-82 Gracechurch Street, 39-40 Lombard Street, Adelaide House; 1 Cornhill and Cannon Street Station; The Tower of London World Heritage Site and the Grade I listed St Peter ad Vincula Chapel and St Thomas's Tower as assets in their own right. Furthermore, GLA officers have identified the requirement for further assessment of potential impact in relation to Tower Bridge, Billingsgate Market, the Custom House Canon Street Station and 1 Cornhill. Following receipt of the additional material sought, GLA officers will be in a position to assess the impact to heritage assets.
- **Climate Change:** Further information in relation to maximising onsite renewable energy and demonstrating potential for connection to a future heat network. The anticipated shortfall in CO<sub>2</sub> reductions should be met through an offset contribution.
- **Flood Risk and Green Infrastructure:** The approach to flood risk management complies with London Plan and Publication London Plan policy. The surface water drainage strategy for the proposed development is in compliance with London Plan policy subject to additional information. There is insufficient evidence on what Water Efficiency measures will be put in place and what level of reduction will be targeted. The proposals as such do not comply with London Plan policy. The proposed integration of urban greening across the development supported and in line with London Plan policy.
- **Transport:** The proposed cycle and car parking is acceptable and complies with Publication London Plan policy, subject to further clarification on cycling access/egress routes; an assessment of the requirement for improvements to cycling infrastructure should be undertaken and a financial contribution towards a cycle hire docking station is required. Further work is required on trip generation analysis in relation to public transport impact. Public realm works to Fenchurch Street and Philpot Lane are strongly supported. The servicing strategy and the multi-use of the ground floor yard and basement area loading bay is supported in principle. Conditions in relation to DSP, CLP and Travel Plans for respective elements of the proposal must be secured.

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